



P Wilson & Company
Chartered Surveyors

**Planning Act 2008 - Section 88 and 89
and the Infrastructure Planning (Examination Procedure)
Rules 2010 - Rules 469 & 13**

**Application by Morgan Offshore Wind Limited and Morecambe
Offshore Wind Ltd for an Order granting Development Consent for
the Morgan and Morecambe Offshore Wind Farm
Transmission Assets**

Response on behalf of

**Mrs Christine Fare
Mr John Fare
& Fare Farms Limited**

of



**To
The Secretary of State
For the Department of Energy Security & Net Zero**

Request for Further Information & Updates

**Interested Party Numbers – Mrs Christine Fare (██████████)
Mr John Fare (██████████) and Fare Farms Limited (██████████)**

**By
(██████████) P Wilson & Company**

1 BACKGROUND

- 1.1 My name is [REDACTED] and I am instructed on behalf of my clients here to act on their behalf in respect of the Morecambe and Morgan Wind Farm Developments (The Applicants) and the current DCO Inquiry into the same. I was first instructed by my clients in late December 2023.
- 1.2 I attach at Appendix 1 my Preliminary Hearing Submission with enclosures.
- 1.3 I attach my Further Hearing Submission for Deadline 6 at Appendix 2 with enclosures.
- 1.4 I attach at Appendix 3 a letter from Mr John Wheadon Head of Energy Infrastructure Planning Delivery and Innovation Department of Energy Security and Net Zero dated 12th March 2026 setting out the further information the Secretary of State requested when considering the Application by Morgan Offshore Wind Limited and Morecambe Offshore Wind Farm Limited (the Applicants) for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farms Transmissions (the proposed development).
- 1.5 At paragraph 30 of the aforementioned letter, the Secretary of State requests further information in respect of farm business assessments and land powers relating to my client, John Fare, noting that he occupies and runs a farming business from Land Holding 26 which includes the proposed site for the Morecambe Sub-Station and works connecting to the laying of cables. The letter observes that the Applicants seek Compulsory Acquisition Powers in relation to this land holding. The Secretary of State notes that the Applicant's farm business assessment and comments from Mr Fare's agent were submitted at Deadline 6 (attached) and further submission to the Applicants were also received and contained in their response to the Rule 17 letter, also attached which was submitted at Deadline 7 at the close of the examination. The Secretary of State observes that given that these documents were submitted at a late stage in the examination the Applicants and Mr Fare are both requested to provide any further comment relating to the issues addressed therein and the Applicants and Mr Fare are also requested to include an update as to whether any agreements have been reached between the Parties through negotiations.

2. RESPONSE

- 2.1 I can confirm on behalf of Mr Fare, in respect of the latter question, that no agreement has been reached between the Parties (my clients and the Applicants) through negotiation. Mr Fare has been open to and willing to continue negotiations with the Applicants. The reality, however, is that despite several requests from the Applicants to meet with my clients, to have those conversations earlier in 2026, those meetings were deferred and postponed by the Applicants and the first real contact the Scheme had with my clients via my offices from the close of the Hearing was not until mid-February and those conversations have been further delayed by the uncertainty surrounding the future of the Morgan element of the Scheme.
- 2.2 Proposals put to my clients by the Morecambe Scheme only, are not commercially acceptable or in my client's view, reasonable. I am unable to share with the Secretary of State the details of those because those conversations have been Without Prejudice.
- 2.3 In respect of the earlier question that the Secretary of State asks and further commentary on the issues addressed in respect of my Submissions on behalf of my client, we have nothing further to add.
- 2.4 My client's position has remained entirely consistent throughout this process, the nature of his farming system means that the impact of one or either or both of the Schemes proceeding, renders his current farming system inoperable and, therefore, his existing farming system would have to cease. I would refer you to my previous Submissions in respect of the Applicant's own Adviser's Report here both in terms of the impact of the Applicant's proposal on my client's business - in essence, the closure of the dairying business and the establishment of a beef enterprise.
- 2.5 The fact that the Morgan Scheme is not engaged in the process with us, makes no difference to the conclusions reached earlier and no difference to my client's position.
- 2.6 The Morecambe Scheme is actually the more southerly of the Schemes and, therefore, the amount of the Farm that is rendered inaccessible due to the construction activities remains unchanged.
- 2.7 The Applicants have failed to demonstrate to myself or my clients that adequate mitigation measures have or could be put in place to mitigate the impact of the Scheme on the business and allow the continuation of the dairying business in its current form and indeed there have been no new proposals put to my clients by the Scheme for such mitigation measures for many months.
- 2.8 The effect of this process on my clients personally and their well being is significant. The uncertainty arising from the DCO process is further compounded by the uncertainty of the future of the Morgan Scheme. The protracted and sporadic nature of the engagement of the Applicants and their Agents with myself and my clients in respect of any discussions and negotiations relating to the basis upon which matters might proceed here by agreement have proved to be hugely stressful and completely inconclusive.

2.9 My client's position has been entirely consistent and it is, with respect, the Applicant's failure to address our concerns and indeed latterly compound those concerns by the introduction of further conditionality attached to such potential negotiations have further compounded the impact of this whole process on my clients.

3. CONCLUSION

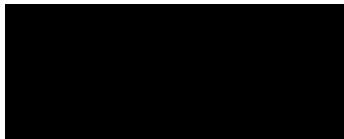
3.1 Our conclusions, therefore, remain as stated in Section 3 of our Further Submissions and the Oral Representations I made on behalf of my clients at the Inquiry.

Appendices:

Appendix 1 Preliminary Hearing Submission dated 11th April 2025

Appendix 2 Further Hearing Submission for Deadline 6

Appendix 3 Letter from Mr John Weadon, Head of Energy Infrastructure Planning Delivery and Innovation Department of Energy Security and Net Zero



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██████████ P Wilson and Company LLP
Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

13 April 2026

APPENDIX 1



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**Planning Act 2008 - Section 88 and 89
and the Infrastructure Planning (Examination Procedure) Rules
2010 - Rules 469 & 13**

**Application by Morgan Offshore Wind Limited and Morecambe
Offshore Wind Ltd for an Order granting Development Consent for
the Morgan and Morecambe Offshore Wind Farm
Transmission Assets**

Planning Act 2008 Application by Preliminary Hearing

Submissions on behalf

of

**Mrs Christine Fare
Mr John Fare
& Fare Farms Limited**

of



**Interested Party Numbers – Mrs Christine Fare [REDACTED]
Mr John Fare [REDACTED] and Fare Farms Limited [REDACTED]**

By

[REDACTED] P Wilson & Company

1. Introduction

I act on behalf of the above who live on [REDACTED], Freckleton and whose Farm is significantly affected by the above Schemes and in particular the Sub-Stations and cable routes in and out of them and to illustrate that I attach two plans – plan A, showing the extent of my client's land ownership and occupation, noting in part that they are owners of land as well as tenants, their landlords being the Trustees of the Hornby Newton Charity (represented by others) and the second an indicative plan of the Scheme so far as it affects my client's land (Plan B).

In simple terms, approximately two thirds of my client's land and, therefore, business is affected by the proposals set out in the Draft DCO by the above Schemes.

It is, and will be, my submission on behalf of my clients that their business as currently constituted, being a paddock grazed Dairy Farm – a sustainable food production unit with low carbon footprint and high biodiversity, will have to cease if this Scheme receives consent and the DCO is confirmed and the Schemes are constructed.

I am unable due to prior commitments to attend virtually or in person, the Preliminary Hearing or the Specific Hearing 1 or the Compulsory Acquisition Hearing 1 all scheduled for the 29th and 30th April and the 1st and 2nd May 2025.

I am therefore instructed by my clients to send these written Submissions to you Sir and the other members of the Examining Authority for your information and consideration.

2. Submission

In response Sir, to your Rule 6 Letter dated 28th March 2025 in respect of the above Schemes, I have registered via the online portal for your Preliminary Meeting and have submitted these representations via that portal as well as by email direct to the Planning Inspectorate.

A. Assessment of Principal Issues

Using Appendix C to your Rule 6 letter as an Agenda and the initial of Assessment of Principal Issues to be considered by the Examining Authority in respect of the Development Consent Order, I make the following submissions on behalf of my clients.

2.1 Aviation

None.

2.2 Compulsory Acquisition and Temporary Possession

It is my submission on behalf of my clients that the extent of the land required under powers sought under the draft DCO render my client's business as incapable of continuation should the draft DCO be confirmed and the Scheme proceed.

The impact of these Schemes, as proposed, will therefore be devastating for my client's business and their property and will require the closure of the business.

These are issues that are compounded by the implications of two separate Projects, potentially on different timescales with two easements and one DCO. The uncertainty that that is providing render the planning for such a Project and the impact on my client's business is impossible. My clients cannot adequately prepare for the Schemes given the uncertainty that surrounds the delivery of those Schemes and the timescales thereof.

That uncertainty is causing distress, worry and makes the managing and planning of farming business going forward over the next few years virtually impossible.

2.3 Ecology

Whilst not ecologists, it is clear to the layman that the Project have not completed their ecological assessments in respect of the Schemes evidenced by their ongoing requests for further ecological and intrusive surveys necessary throughout the forthcoming calendar year and, therefore, it would be my submission that the Scheme have not yet adequately addressed the ecological impacts of their proposal and that the DCO process is being driven by Grid connection dates imposed by National Grid on the Scheme rather than the proper assessment of the Schemes and the implications thereof.

It is interesting to note that both the Morecambe and Morgan Sub-Station sites were selected at Freckleton before any formal ecology surveys had been undertaken on my client's property and to their knowledge, on surrounding properties affected by those

Sub-Stations and therefore that site selection process has to be questioned as to its validity from an environmental perspective.

2.4 Flood Risk, Groundwater and Surface Water

It would be my client's submission and concern that given the level of infrastructure being constructed on their property there is a serious risk of run off water increasing local flooding.

2.5 General Matters

It is my client's submission that the Project's approach to construction scenarios and co-ordination between the Projects is inadequate and as yet, their approach to construction, compounds, programming, timing and delivery of the works are unknown and their processes are being driven again by connection dates supplied by National Grid and the desire to achieve a DCO approval without first adequately assessing the impact of the Schemes on the local area, the environment and the people and businesses that will be affected by the proposal.

2.6 Greenbelt

My client's property is situated within the Greenbelt so far as the Schemes are proposed save as to a very small area that is situated within Countryside Area and is, therefore, the land affected is afforded the Protective Policies that the Fylde Borough Local Plan affords to such identified areas.

It would be my submission on behalf of my clients that the Scheme has failed to demonstrate that the design and location of the Sub-Stations at Freckleton has met the Greenbelt requirements or demonstrated that the very special circumstances exist that should mean that they should be an exception to that Greenbelt Policy.

2.7 Historic Environment

No comment.

2.8 Land Use and Recreation

As scheduled in my preliminary comments above, the affect of the proposals here on the agricultural land that comprises my client's farm, its soil quality and associated farming operations and therefore my client's business here by these proposals and the uncertainty surrounding their delivery will have a devastating effect and require the closure of my client's current farming business. This has been brought to the attention of the Schemes in conversations with them over the last many months and I reserve the right to make further submissions in this respect at a later date in the further Compulsory Acquisition and Site Specific Hearings.

2.9 Landscape

My submissions here are that the design and appearance of the Onshore Sub-Stations included within the Application do not meet the Greenbelt or other acceptable design criteria.

2.10 Marine Physical Processes and Coastal Change

No comment.

2.11 Noise and Vibration

The operational effects and construction effects of this Scheme on my client's business, property, and livelihood and home environment will be devastating and will require the closure of his existing farming business as scheduled above.

2.12 Other Offshore Matters

No comment.

2.13 Social Economic Effects on Human Health

As scheduled above, the uncertainty surrounding the delivery of this Project – will the DCO be approved and if so, how will the Scheme be constructed and over what timescales – are having significant impact on my client's human health and mental wellbeing.

B. Specific Hearing 1

2.14 Agenda Items 4, 5, 6, 7 and 8

I would make submissions on behalf of my clients that the issues here around the site selection processes; proposed construction scenarios and stages and durations; co-ordination between Morgan and Morecambe Projects; the proposed construction hours and mobilisation and the cumulative effects and inter-relationships between the Projects have not been properly assessed and taken into account in arriving at the proposals contained within the Draft DCO and that as a consequence, the effects on local business have not been properly assessed and that, furthermore, progress and discussions with interested parties in respect of the DCO and how matters can be addressed within the DCO to address specific landowner's and occupier's concerns have been painfully slow and have not allowed those affected to properly assess the impact of the Scheme and/or make relevant representations to the Examining Authority.

C. Compulsory Acquisition Hearing 1

2.15 Agenda Items 2, 3 & 5

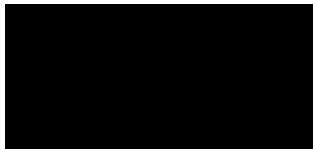
The applicant's approach here to the Draft DCO and their approach to negotiations with landowners and occupiers affected by the Scheme bears in my submission examination. I understand the need for the Scheme to pursue the Draft DCO and I also understand the Scheme's desire and quite rightly, to pursue by negotiation the acquisition rights sought under the Draft DCO by agreement with landowners and occupiers.

The Scheme have asserted to those affected that irrespective of the Draft DCO and/or its confirmation, their preference is to proceed by way of negotiated agreement for an option to take an easement.

The Scheme, through their agents have conducted those negotiations which are ongoing and although progress is being made in respect of the same, the outcome thereof is far from certain and has again created significant uncertainty for landowners and occupiers here as to how to respond to the Scheme and the Draft DCO. There is a good deal of scepticism as to whether or not the Scheme will eventually rely on any negotiated terms or the Draft DCO and that compounded with the uncertainty about how the Schemes will proceed – separately or in unison and over what timescales, has created a great deal of difficulty for those affected by the Scheme as to how proceed and the impact of the Scheme on their livelihoods, businesses and wellbeing. Again, negotiations within individual landowners are painfully slow and create the uncertainty scheduled above.

3. Conclusions

- 3.1 The above is a summary of the issues and concerns that my clients have in respect of the Scheme and I reserve their position to make further submissions in respect of the matters scheduled here in subsequent Specific and Compulsory Acquisition Hearings as to the detail behind those submissions here and the effect of this Scheme on my client's property.



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██████████, P Wilson and Company LLP
Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

11 April 2025

APPENDIX 2



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Rules 2010 - Rules 469 & 13**

**Application by Morgan Offshore Wind Limited and Morecambe
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**Planning Act 2008 Application by Preliminary Hearing
Further Submissions for Deadline 6**

on behalf of

**Mrs Christine Fare
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of



**Interested Party Numbers – Mrs Christine Fare [REDACTED]
Mr John Fare [REDACTED] and Fare Farms Limited [REDACTED]**

By

[REDACTED] P Wilson & Company

1 BACKGROUND

- 1.1 My name is [REDACTED] and I am instructed on behalf of my clients here to act on their behalf in respect of the Morecambe and Morgan Wind Farm Developments and the current DCO Inquiry into the same. I was first instructed by my clients in late December 2023.
- 1.2 During the first half of 2024 we engaged with Dalcour Maclaren, the agents acting on behalf of the Schemes (the Morgan and Morecambe Wind Farm Schemes) to discuss the impact thereof on my client's business and property at Lower House Farm, Freckleton.
- 1.3 By July 2024 we had supplied a substantive amount of information – all the information the Schemes requested to explain my client's businesses, his tenancy agreements and his farming operation along with a detailed analysis of his business.
- 1.4 The purpose for these without prejudice conversations and negotiations from my client's perspective and as I and they understood it from the Scheme's perspective through Dalcour Maclaren, was to explore the possibility of entering into an agreement whereby it would be accepted by all that it would be in the interests of all – to see my client's business cease and the Schemes proceed unfettered by the complications trying to mitigate the Scheme's impact on my client's business because at that stage (and consistently throughout our negotiations) it is my and my client's view (for reasons I have explained already and will explain again) that this cannot continue in a viable manner with the Schemes as proposed in the Draft DCO.
- 1.5 In November 2024 Dalcour Maclaren on behalf of the Schemes advised that GSC Grays were being instructed to prepare a Business Impact Assessment of the Schemes on my client's property and business.
- 1.6 With 3 working days' notice GSC Grays came on the 18th December 2024 to inspect the farm and the substantial data pack demanded (including 5 years' worth of accounts). The considerable amount of detailed data requested included past, present and future performance data and this was delivered. It took Grays and the scheme until April 2025 to produce their Draft Report.
- 1.7 That report was only made available to my clients by the Schemes after my clients agreed to sign a Non-Disclosure Agreement at the insistence of the Schemes.
- 1.8 A redacted copy – merely redacting sensitive commercial financial information about my client's businesses is being submitted by Deadline 6 by the Schemes.
- 1.9 We were advised by the Schemes that the purpose of the Grays Report was to help inform the Schemes as to the impact of their proposals on my client's property by an Independent Experts in farm business management.
- 1.10 The conclusions of the Grays Report are self-explanatory and in our submission the key ones from that are as follows –

- a) There is an agreed assessment of an average profit for my client's business. It is a highly profitable dairy enterprise.
- b) The Dairy enterprise is incapable of continuing in its current form if the Schemes as proposed proceed.
- c) That the appropriate alternative mitigation farming system is a beef system.
- d) For the Inspectorate's ease I attach at Appendix 1 and 2 two plans, the first showing the extent of my client's land holding and whether it is owned or tenanted and at Appendix 2 a plan showing the overall impact of the Schemes on that land holding.

1.11 The primary issue here is one of access. My client's Dairy enterprise is described in the Grays Report and is a grass based grazing system making highly efficient use of grass as the primary source for production of milk. The cows flows naturally and freely in an undisturbed manner across the entire farm through an extensive network of strategically placed to cow tracks and paddock graze intensively. The impact of the permanent and temporary land take and the uncertainty around the timing and delivery of one or both or either Scheme have led myself and my clients to determine the business as currently constituted cannot operate during the construction and delivery of the Schemes and that furthermore a reduced scale version thereof would not be viable because of the issues of scale and efficiency. In our minds, the Grays Report substantially confirms that.

1.12 In the six months that have followed the publication of the initial Grays Report, negotiations have continued with the Schemes around a potential settlement agreement.

1.13 The Schemes have requested further information and advised that they wish to consider whether or not there were any engineering mitigation proposals that could mitigate the impact of the Schemes on my client's business and therefore allow it to continue in some shape or form. This meeting was held on the 13th May.

Those engineering mitigation proposals were shared with my clients on 22nd September 2025.

At a similar time, the Scheme advised that they wish to take advice from Veterinary Experts on the impact of moving cow flow.

1.14 My clients agreed to that proposal and we agreed on the appointment of [REDACTED] to commission an Independent Report to consider how the construction of the two Sub-stations, 2 – temporary build areas, 2 easements in and 2 easements out, on Lower House Farm would have on the Dairy business and my client.

At the 22nd September meeting the Vet [REDACTED] [REDACTED] and GSC Gray's representatives was hosted. A discussion of the mitigation options commenced including full farm access, and a real time cow flow demonstration down a mile of track, to help all involved understand the impact to the milking herd.

- 1.15 At the end of September, the Schemes then instructed [REDACTED], a Veterinary Expert, to commission a further Report in respect of the same issues without the knowledge of my client.
- 1.16 On Wednesday, 15th October, the Schemes shared with myself and my clients, a draft of a further report prepared by GSC Grays entitled Business Impact Mitigation Options Assessment of that Report and we believe that a redacted copy is going to be submitted to the Inspectorate by Deadline 6 by the Schemes. The draft of that Report attaches to it, as Appendices, the two Veterinary Reports referred to above. It is interesting to note that Grays were instructed to provide that further report as early as August 2025 and the details here were only shared with my clients a week ago.
- 1.17 The DCO Inquiry and the Inspectorate already have my previous Submissions and my verbal evidence given at the Compulsory Purchase Hearings.
- 1.18 Throughout the last 21 months, my clients and I have done all we have been asked of in terms of supplying information to the Schemes on the clear understanding as to what we were trying to achieve – a negotiated settlement between the Parties in advance of the confirmation of the DCO.
- 1.19 We have accommodated every visit, every conversation, every request for information. In total, my clients have committed in excess of 535 hours of their time dealing with matters pertaining to the Schemes so far as it affects their property. The vast majority of that has been co-operating with the Schemes rather than objecting to the Schemes.
- 1.20 Whilst committing all that time and emotional commitment to these negotiations, Mr Fare has continued to run his farming business and Mrs Fare has continued to run her Independent Consultancy. Mr and Mrs Fare have entered into these negotiations in good faith. As I have previously advised, they don't want the Scheme to proceed, but if the Scheme has to proceed, they rather it proceeded in such a manner as it did not affect Lower House Farm.

2. THE PROPOSED MITIGATION

- 2.1 Having set the background here, the Schemes as I advised above, only very recently shared their proposed mitigation strategy. The Schemes requested a meeting to discuss the further Report from GSC Grays, Business Impact Mitigation Options having supplied the same to us on Wednesday of last week (15.10.2025), we met them on Friday (17.10.2025).

The dates please should be noted – Grays were instructed in August to prepare this report and it is only shared with us this last week and a week in advance of Deadline 6.

- 2.2 The Schemes wanted to discuss with my clients and I the Grays further Report and we declined to do so, advising the Scheme that they could submit a redacted copy (in respect of commercially sensitive financial information) to Deadline 6 with both Parties then making their own representations in respect of the same and hence these further Representations. As a consequence, and over the last week, my clients and I have considered the further Grays Report, we have not had the time

to prepare or submit detailed Counter Proposals because we have not had time to properly consider the same. I would, however, on behalf of my clients, like to make the following observations of the further Report that would allow the Inspectorate and the Examining Body to draw their own conclusions when considering this further Report and the outcomes of the first Grays Report.

2.3 The following, therefore, is a summary of the observations we have on the further Grays Report in respect of the Business Impact Assessment.

2.3.1 The scope of the report and the general approach is clearly stated in the Executive Summary, crucially Grays are instructed to assume that where the provision of new and/or amended infrastructure and/or mitigations is required to deliver the continuance of Dairy Farming, the Projects will provide such infrastructure and their own expense and to the appropriate standard. Grays are assuming that the mitigation proposals will work.

2.3.2 Careful examination needs to be given to the two Veterinary Reports, [REDACTED] is a well respected Dairy Veterinary Expert who specialises in grass based systems. She has inspected the farm visited the location and reviewed the cow flow and assessed the potential cow behaviour.

2.3.3 The Grays' conclusions in the Executive Summary clearly rely on the assumptions that the Projects will provide the unproven mitigation proposals. It relies on [REDACTED] views and cheerfully ignores [REDACTED] and it acknowledges that the reduction in scale will require a different management approach from Mr Fare of which they feel is not unreasonable to expect a prudent person seeking to mitigate his losses in such a situation. A sea change from their first Report where they clearly state the appropriate mitigation here is a beef based enterprise.

2.3.4 At a high level under Section 2 of their Report and development scenarios we don't believe that Grays have taken sufficient account of the impact of temporary land take and/or the unknown timings of the Schemes proceeding, neither do we believe the mitigation proposals proposed adequately deal with this. Dairying enterprises have at least a three year lead in terms of breeding replacement stock in advance of committing to breeding replacement stock. We have to be able to predict what land that will be available three years' in advance of committing to breeding replacement stock.

As I have previously advised, both in writing and verbally, the uncertainty around the timing and delivery of these Schemes is one of the major factors impacting my client's business and mental well being and the ability of the business to be sustained going forward throughout the construction phase.

2.3.5 The review of the mitigation options is clearly based on the statements and assumptions made. It acknowledges that [REDACTED] concludes that it would be challenging but feasible to continue a grazing system while [REDACTED] view it is not feasible to maintain a Dairy enterprise. The Grays Report and the Schemes then choose to ignore [REDACTED] view and proceed to argue that the impact here can be mitigated to allow a Dairying System to continue. If I am being charitable that is a very convenient line of argument to take and I do not believe that Grays would be able to sustain, as a professional Expert, the line they have

taken here, without the clear assumptions and instructions that they have been told to act under by the Schemes.

If you ask a question in a manner that can only be answered one way, that does not make the answer correct.

- 2.3.6 There is no evidence in the further Business Impact Assessment other than the assertion and view of ██████████ that the proposed mitigation measures are or will be capable of being delivered or working and indeed, in his own words, ██████████ concludes that even under his proposals it will be challenging to do so.
- 2.3.7 The financial viability of the proposed mitigation solution is fundamentally flawed because again, there is no evidence in the Business Impact Assessment to show that the mitigation proposals proposed will actually work, in fact the evidence is to the contrary.
- 2.3.8 The Grays conclusions are again, based on Dr Atkinson's views and completely ignore those of ██████████ who was appointed by the Schemes as an Independent Expert.
- 2.3.9 So far as the financial information contained in the Appendices are concerned, we have neither had the time or frankly the inclination to consider it in any detail because we believe that the Grays Report is so fundamentally flawed because of the instructions upon which were given to Grays and the assumptions that they have made.
- 2.3.10 However, what is worthy of further commentary is in respect of the Draft Expert Report of ██████████.
- 2.3.11 I have already highlighted the lateness of his instructions and the fact that this is a desktop assessment. Again, I think it is interesting to note his instructions and the assumed facts. If you ask a question in a certain way, you get the answer you want.
- 2.3.12 We would fundamentally disagree with ██████████ statements in Section 3 of his Report on the performance of this business when compared to average Dairying businesses. He is not comparing like with like. My client's business is widely recognised as one of the most efficient Dairying businesses in the North West of England and that recognition has been made by many and independently.
- 2.3.13 How ██████████ can at Paragraph 44 say admit that he does not know how precisely the grazing rotation routine works and then go on to argue that it could be sustained by the mitigation proposals demonstrates a fundamental misunderstanding of my client's business and how the operation works.
- 2.3.14 ██████████ mitigation proposals are again fundamentally flawed. Neither he nor the Schemes have any idea as to the timing or nature of construction or the length of the construction periods, so how he can state that the disruption will not be long lasting is frankly beyond us. Whilst the provision of underpasses or over bridges might assist, to base recommendations on the assumptions that there could be communication between the construction of these Schemes and my client is frankly laughable. These Schemes have already demonstrated through the Environmental

and Ground Investigation Survey that they have been undertaking in the last eighteen months that communication between the Schemes, their Agents, their Contractors and those affected is frankly appalling, a point that is made widely to the Inspectorate and the Inquiry throughout the DCO Inquiry.

- 2.3.15 At Section 4, ██████████ accepts that he has not considered beef rearing in any depth, in fact I don't think he has considered it at all and the assumptions that he makes as to 150 or a 200 cow dairy herd going forward are made without any actual evidence that can be the case, this is all based on opinion and as with the Grays Report it is an opinion caveated by the nature of the instruction and assumptions made and no evidence has been submitted to show that the mitigation proposals, assumptions and instructions can be delivered successfully.
- 2.3.16 ██████████ conclusions are based on assumptions rather than the facts and the performance of my client's Farming Business.
- 2.3.17 At Paragraph 1.15 ██████████ accepts continuation of the Dairy Enterprise at Lower House Farm during construction is feasible but challenging and the proposed mitigation strategies are sound and yet gives no evidence, just opinion, as how he arrives at those conclusions.
- 2.3.18 To say that we disagree with ██████████ conclusions is an understatement.
- 2.3.19 Alternatively, ██████████ gives a considered balanced and evidenced Report as to the impact of the proposed mitigation on my client's business and concludes that although various mitigation factors have been considered, the reduction in herd size require to continue the Business as Dairy would be so large that the Business would be unlikely to be viable financially and would be unlikely to meet compliance issues with the ARLA contract in several areas. ██████████ is a recognised Expert in grazing systems and has inspected the Farm and knows the Farm.

3. CONCLUSIONS

- 3.1. It is my submission and it is my client's view here that regrettably if these Schemes are to proceed then his Dairying Enterprise will have to cease, that is not something they wish to contemplate but they are being forced to do. They have entered into in a completely bona fide manner, what they felt would be an open and honest negotiation with the Schemes to provide a solution and an outcome that would see them compensated for the closure of my client's business and allow the Schemes to proceed unfettered with the construction of the largest engineering elements of this Scheme – the two Sub-Stations and all the cable runs in and out along with the permanent accesses thereto.
- 3.2 That would be achieved by effectively severing 75% of my client's Farm, i.e. everything north of the new permanent access road to the Sub-Stations.
- 3.3 As previously advised and stated, my client's highly profitable Dairy Business is only profitable and so successful for the following reasons –
 - a) It is ruthlessly efficient on the use of grass for milk production.

- b) It is ruthlessly efficient in keeping all other costs in the Business to a minimum.
 - c) The grassland management is second to none and drives those efficiencies.
 - d) The paddock grazing system delivers all of that and the free movement of cattle throughout the Farm on the cow track system and the paddock grazing system is what delivers that.
- 3.4 With a three year lead time for breeding replacement livestock my clients have to know what land is going to be available to them reliably over three years in advance. Simply providing additional replacement cow tracks to unknown quantities of land with unknown dates as to when it will be available is not mitigating the losses here, it is merely going to compound them.
- 3.5 I regret to advise that in my view the manner in which the Schemes have conducted these negotiations and their investigations is wholly regrettable, they are putting huge pressure on my clients both from a practical, physical and mental perspective over the last twenty months, constantly promising answers and only coming up with further questions.
- 3.6 Without the economies of scale and the efficiencies in the Business, the Dairying Business at Lower House Farm is not sustainable and is not profitable, I know that, Mr and Mrs Fare know that and [REDACTED] knows that.
- 3.7 [REDACTED] and GSC Grays are only able to conclude otherwise because of the instructions they have been given and the assumptions upon which their views are made and I have demonstrated this and other evidence given to the Inquiry on behalf of my clients that those instructions and assumptions are fundamentally flawed because the mitigation proposals upon which they are based are completely unproven to work.
- 3.8 The Inspectorate have acknowledged that Lower House Farm is the most severely impacted property on the Scheme, they like we, have pushed the Scheme to engage in meaningful dialogue and updates with regard to the impact of their proposals on Lower House Farm and whilst the Schemes have spent a lot of time, and I am sure money, in considering this, they have not actually done anything to provide any mitigation that can work.
- 3.9 It would be my submission that the only way to reduce the impact of these Schemes on Lower House Farm is to see them redesigned so as to move the Sub-Stations and the cable runs into them off Lower House Farm or for the Schemes not to proceed at all.
- 3.10 Failure to do either of those things will necessitate the closure of my client's Dairying Business with all the implications it has for my clients.
- 3.11 I and my clients remain available, as we have been throughout this process, to the Schemes and indeed the Inspectorate to further address any questions or concerns they have in respect of the impact of these Schemes on Lower House Farm and Mr Fare's businesses and we would happily address any questions or concerns the

Inspectorate have in respect of this further Submission and any further Submission made by the Schemes so far as they affect Lower House Farm.

Appendices:

Appendix 1 Plan

Appendix 2 Plan

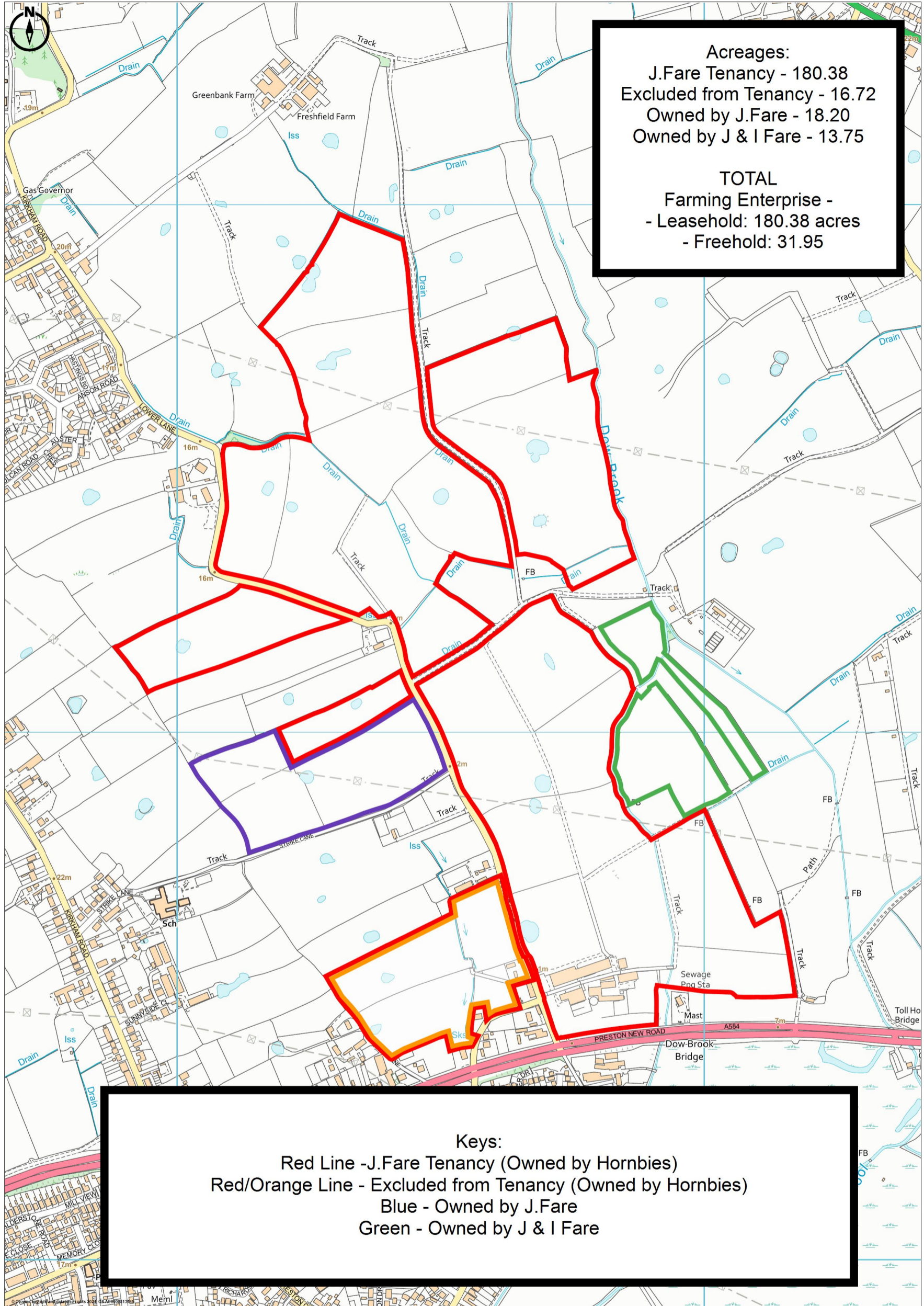


.....
[Redacted], P Wilson and Company LLP

Duly authorised Agent to: Mrs Christine Fare, Mr John Fare & Fare Farms Limited

21 October 2025

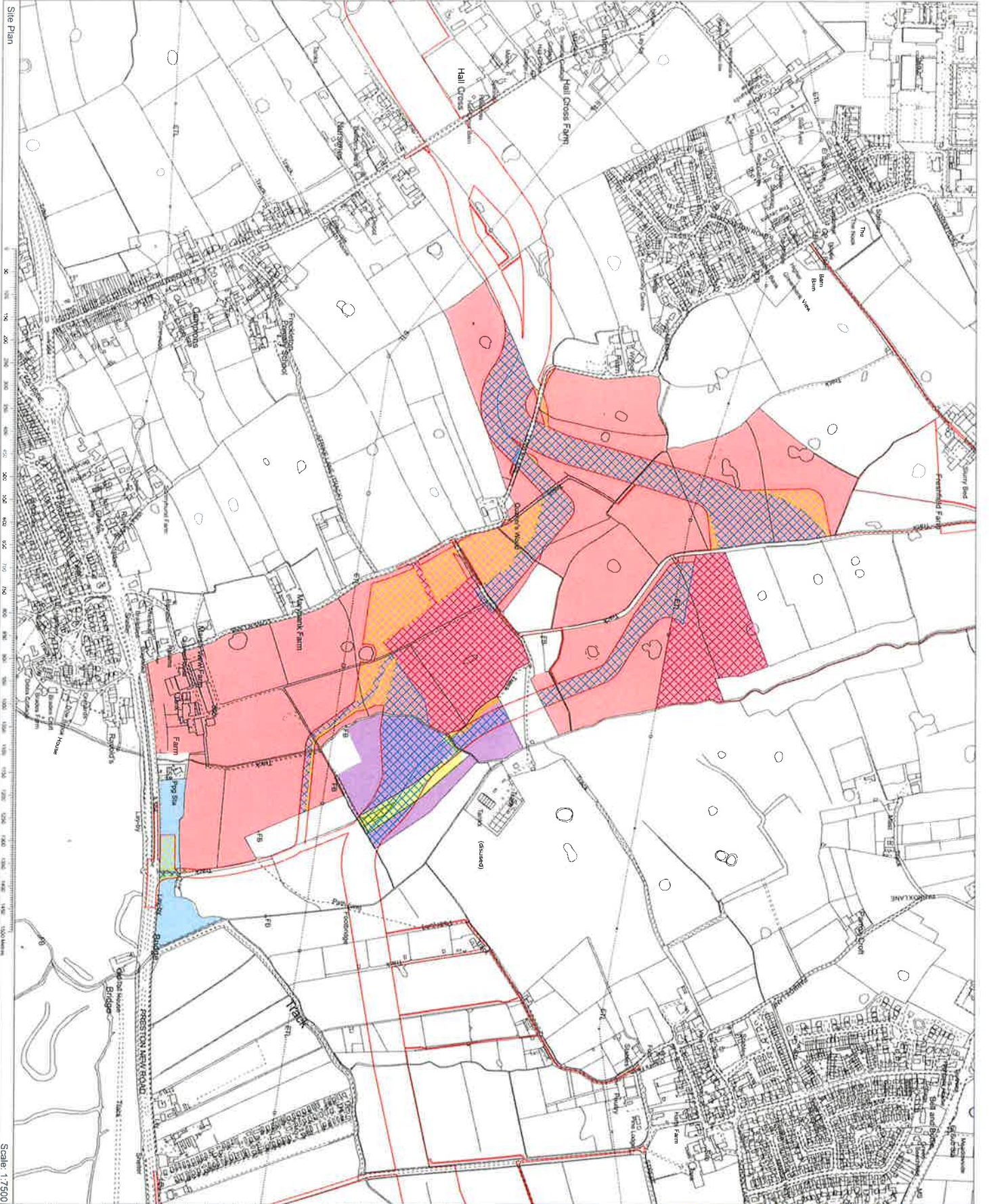
J.Fare - Farming Acreage



Acreages:
 J.Fare Tenancy - 180.38
 Excluded from Tenancy - 16.72
 Owned by J.Fare - 18.20
 Owned by J & I Fare - 13.75

TOTAL
 Farming Enterprise -
 - Leasehold: 180.38 acres
 - Freehold: 31.95

Keys:
 Red Line - J.Fare Tenancy (Owned by Hornbies)
 Red/Orange Line - Excluded from Tenancy (Owned by Hornbies)
 Blue - Owned by J.Fare
 Green - Owned by J & I Fare



Client: Jonathan Gurney, Brian, Victoria God
 Project: Tenancies at Morecambe
 Date: 05/03/19/26

Interest: John Fare & Irene Fare & John Cuthbert
 Fare

Tenants: Freckleton, Borough of Ryde, PR4 1HQ

Coords: 343581, 430192

Scheme Name: Morecambe & Morgan

Drawing Name: Information Plan

Drawing No: 22003214_PLN_INFO_12837.1

Rev	Date	Description
07/11/2024	First Issue	

Notes:

- Order Limits
- Absolute Freehold - Irene Fare
- Absolute Freehold - Irene Fare & John Cuthbert Fare
- John Cuthbert Fare
- Unregistered Freehold - Irene Fare & John Cuthbert Fare
- Unregistered Freehold - John Fare & Irene Fare & John Cuthbert Fare
- Tenancy - John Fare
- Freehold Acquisition
- Permanent Rights
- Temporary Possession
- Morecambe Permanent Rights & Morgan Temporary Possession

UNAPPROVED ISSUE

1 of 1

A3

APPENDIX 3

To:
Agents SHP Valuers acting for Greenbank Farm
All Interested Parties
BAE Systems
Blackpool Borough Council
Canal and River Trust
Defence Infrastructure Organisation
Eastham Hall Farm
Fylde Borough Council
John Fare
His Majesty's Coastguard
Lancashire County Council
Morgan Offshore Wind Limited and Morecambe
Offshore Windfarm Limited
Natural England
The Crown Estate
The Duchy of Lancaster
The Secretary of State for Transport
Wrea Green Equitation Centre

Our Ref: EN020032

Date: 12 March 2026

Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (“the Applicants”) for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets (“the Proposed Development”)

REQUEST FOR INFORMATION

1. Following the completion of the Examination on 29 October 2025, the Examining Authority submitted a Report and Recommendation in respect of its findings and conclusions on the above application to the Secretary of State on 29 January 2026. In accordance with section 107 of the Planning Act 2008, the Secretary of State has three months to determine the application.

2. There are issues on which the Secretary of State requests that the parties identified below provide updates or information as appropriate.

Correspondence received from the Applicants since the close of the examination

3. The Applicants supplied updates to the Secretary of State on 30 January 2026¹ [PID-001] and 12 February 2026² [PID-002]. All **Interested Parties** are invited to comment upon these documents.

Onshore Ornithology and Bird Strike Risk to Aviation at Warton Aerodrome

4. **BAE Systems (BAE)** and **Defence Infrastructure Organisation (DIO)** are requested to confirm whether their bird strike risk concerns relate solely to the Newton-with-Scales site (Work No. 49A/49B) or all mitigation sites proposed by the Applicants.
5. The **Applicants** are requested to explain how Spatial Scheduling (H2, H32, H33, NE20 in [RR-1601]) has been applied to reduce disturbance of ornithological features of the Ribble and Alt Estuary Special Protection Area (SPA) and whether it can be further applied to reduce or avoid the need for mitigation areas and therefore reduce or avoid the risk of bird strike.
6. Noting the alternative mitigation measures summarised in Appendix H of [REP6-115] and the Applicants' post-Examination representation dated 12 February 2026 [PID-002], the **Applicants** and **Natural England** are requested to provide an update on discussions regarding alternative mitigation measures and whether implementing further avoidance measures could avoid the need for mitigation areas. The **Applicants** are requested to provide a further update to [REP6-115], as the Applicants suggested in [PID-002], to include commitments to temporary habitat reinstatement measures during relevant seasonal periods, proportionate to the nature and duration of the works.
7. The **Applicants, BAE** and **DIO** are requested to provide updates on their progress in seeking to resolve the outstanding disagreement regarding bird strike risk. **BAE** and **DIO** are requested to provide any comments on the Applicants' final outline Wildlife Hazard Management Plan ("oWHMP") [REP7-034, REP7-035] submitted at Deadline (D)7.
8. The Secretary of State notes that in [REP2-046] the Applicants ruled out the use of Newton Marshes Site of Special Scientific Interest (SSSI) as a mitigation area due to its proximity to Warton Aerodrome. However, he also notes that DIO's post-Examination submission of 6 November 2025 sets out a preference for the Newton-with-Scales mitigation area to be replaced by "a site south of Warton Aerodrome, ideally to the south of the estuary". The **Applicants** are requested to explain

¹ https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020032-002689-S_SoSQ_1_MMTA_Update_Letter_to_SoS_F01.pdf

² https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020032-002691-1-S_SoSQ_2_MMTA_February_Update_Letter_to_SoS_F01.pdf

whether any alternative mitigation areas have been, or could be, identified that would address this request.

9. The Secretary of State notes that DIO's post-Examination submission dated 6 November 2025 also states *"For a management plan to be effective in mitigating the potential increase in birdstrike risk it would need to ensure that no hazardous birds are utilising the Newton-with-Scales site above the levels that are currently present there"*. **DIO** and the **Applicants** are requested to comment on whether the DIO's concerns could be resolved by the oWHMP defining bird population levels and committing to triggers/thresholds for active management. The **Applicants** are requested to provide further information on triggers/thresholds for active measures within the oWHMP and whether it could commit to such thresholds at this point. The Secretary of State encourages the Applicants to consult with Natural England on the triggers/thresholds for active management to ensure they are set at a level which still allows the mitigation areas to be effective from an HRA perspective.
10. The Secretary of State notes that a Non-Disclosure Agreement has been entered into to enable the sharing of bird strike risk data sets but is concerned that little progress appears to have been made in resolving this issue despite significant attention during Examination. The Secretary of State requests **BAE** to provide supporting information to enable the Applicants to undertake a Bird Strike Risk Assessment to BAE's satisfaction, given that such an assessment is central to resolving BAE / DIO's concerns on bird strike risks to the safe operation of Warton Aerodrome. The **Applicants** and **BAE** are requested to provide updates on data sharing and progress on the bird strike risk assessment and, include a timeline for completion if this cannot be achieved by the response deadline.
11. If the data has not been, or will not be, made available to the Applicants by BAE in a timely manner, it will be necessary for the Secretary of State to proceed to make a decision in the absence of that information. In this regard and with reference to [PID-002], if the additional data from BAE will not be available to the Applicants in a timely manner, the **Applicants** are requested to proceed with updating their bird strike risk assessment and provide this to the Secretary of State and BAE/DIO along with their other responses to this information request, without that additional data. This assessment should include further detail on how the mitigation areas are expected to affect bird population sizes, distributions and movements within the 13km wildlife zone surrounding Warton Aerodrome.

Habitats Regulations Assessment (HRA)

12. **Natural England** is invited to comment on any D6 or D7 submissions from the Applicants relating to HRA conclusions and confirm whether these resolve any of its outstanding concerns.
13. **Natural England** is invited to comment on the oWHMP and draft Wildlife Attractants Habitat Risk Assessment [REP7-034] and specifically on whether the proposed measures to reduce bird strike risk will negatively impact the proposed mitigation areas for the Ribble and Alt Estuary SPA.

14. The **Applicants** and **Natural England** are invited to provide any other updates relevant to HRA matters.

Marine Physical Processes, Subtidal and Intertidal Ecology

15. The **Applicants** are requested to update Table 3 of the Cable Specification and Installation Plan [REP6-097] (and any other relevant documents) to include the Maximum Design Scenario ("MDS") for sandwave clearance by area (m²) and to provide an explanation of how the MDS for sandwave clearance by volume (m³) has been calculated.

16. **Natural England** is requested to comment on the Applicants' D6 updates to the Offshore In Principle Monitoring Plan [REP6-104] and advise whether these resolve its concern relating to sandwave recovery set out in NE.PP.5 [REP6-179].

17. The Secretary of State notes that the Applicants have committed to monitoring of sandwave recovery from cable preparation and installation activities, through comparison of pre- and post-construction geophysical data [REP6-101]. He also notes that for Outer Dowsing Offshore Wind Farm inherent uncertainties in relation to sandwave recovery, from the same impacts, were resolved with a commitment to longer-term monitoring of sandbanks if full recovery is not observed³. The **Applicants** are therefore requested to consider updating [REP6-101] to secure further surveys of sandwave recovery if the initial post-construction survey does not indicate full recovery.

18. The **Applicants** are requested to explain how the 3% MDS for cable protection within the Fylde MCZ (as set out in CoT47 [REP6-042] and the outline Offshore Cable Specification and Installation Plan [REP6-097]) was calculated.

19. At the close of the Examination, Natural England advised that the Applicants should undertake project specific modelling in relation to indirect impacts to designated sites resulting from cable protection in the nearshore areas (RI_B3 in [REP6-193]; NE.PP.3 in [REP6-179]). The Applicants [REP7-042] considered this unnecessary due to nearshore ground conditions which allow for cable burial and because CoT45 [REP6-042] prevents cable protection from reducing water depth by more than 5%. The Secretary of State notes, however, that CoT45 allows for cable protection to exceed 5% water depth, subject to written approval from the relevant authority. The **Applicants** are requested to explain how the potential impacts to physical processes and designated sites from nearshore cable protection have been assessed, for the scenario where nearshore cable protection exceeding 5% water depth is required and approval is granted from the relevant authority.

20. Without prejudice to the Secretary of State's conclusions on impact to the Fylde MCZ, and in line with the Applicants' offer in [PID-002], the **Applicants** are requested to propose updated wording for their without prejudice benthic compensation DCO schedule [REP5-108]. The **Applicants** should consider if they

³ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010130-002644-HRA-report-from-SoS.pdf>

wish to specify the impact based on the MDS or include a mechanism for this to be agreed post-consent and prior to the commencement of relevant works.

21. Without prejudice to the Secretary of State's conclusions in relation to the Fylde MCZ, the **Applicants** are requested to confirm whether they have engaged with Defra regarding the use of the MPA designation and/or extension measure of the Marine Recovery Fund and whether there would be sufficient capacity within the measure to provide measures of equivalent environmental benefit (MEEB) for the loss of up to 3.04 ha of subtidal mud and up to 2.64 ha of subtidal sand.
22. **Natural England** is requested to comment on any further D6 & D7 submissions relevant to the Marine Conservation Zone Assessment and confirm whether these resolve any of its outstanding concerns.
23. The Secretary of States notes the outstanding disagreement between the Applicants and Natural England regarding mitigation measures for impacts to marine physical processes (NE.PP.4 in [REP6-179]). **Natural England** is invited to explain its outstanding concerns and recommend how these could be addressed.

Landscape and Visual

24. Concerns were raised during the Examination [REP7-028, REP7-027, REP1-085] regarding the adequacy of the proposed mitigation measures for the onshore substations, particularly in relation to the effectiveness of the visual screening. The **Applicants** are requested to propose options to further mitigate the landscape and visual impacts of the proposed substations and explain the potential effectiveness alongside any potential adverse impacts of these proposed options.

Construction Hours

25. During the Examination, the Applicants proposed that core construction hours should be between 7:00-19:00 on weekdays and 7:00-13:00 on Saturdays, with an hour either side on weekdays for mobilisation activities. On a without prejudice basis, **the Applicants** are requested to provide updated documents with references to mobilisation activities removed, including the documents comprised within the Code of Construction Practice [REP6-067], which includes the outline Code of Construction Practice itself and the outline Construction Noise and Vibration Management Plan [REP6-083].

Flooding

26. The protective provisions for Lancashire County Council, the lead local flood authority, were not agreed by the end of the Examination [REP6-188]. The Applicants have confirmed in [PID-002] that the parties are close to reaching agreement. **Lancashire County Council** and the **Applicants** are requested to provide updates regarding the protective provisions and proposed amendment to Article 7 of the draft Development Consent Order (dDCO), and whether Lancashire County Council withdraws its objection.

Biodiversity Net Gain

27. Requirement 26 of the dDCO provides the mechanism for securing the delivery of 10% BNG. The **Applicants** are invited to comment on proposed amended wording for Requirement 26 (1) of Schedules 2A and 2B as set out below:

26. (1) The Project [A/B] onshore works must not be commenced until a biodiversity benefit scheme (in accordance with the outline biodiversity benefit management plan) has been approved in writing by the relevant planning authority in consultation with the statutory nature conservation body.

Other Onshore Ecology

28. Concerns were raised by Natural England throughout the Examination [RR-1601, REP6-179, REP6-190, REP5-184] regarding the need for further targeted peat surveys and the absence of provision for compensation. The **Applicants** are requested to update the outline Soil Management Plan [REP6-091] to confirm that no works will be undertaken within the non-surveyed areas until further targeted pre-construction surveys have been completed, and the findings of those surveys have been used to determine whether mitigation and/or compensation measures are required. The **Applicants** are requested to make provision for a compensation mechanism (based on a reasonable worst-case scenario [REP5-184]), should surveys identify a significant risk to the restorability of the deep peat that cannot be avoided or mitigated through other measures.

29. The Secretary of State notes Natural England's concern regarding indirect significant impacts on the Lytham St Annes Dunes SSSI from cable installation and advice in its closing statement [REP7-050] that it has not reviewed the Applicants' updated outline Landfall Construction Method Statement [REP6-151]. **Natural England** is invited to comment on the updates and advise whether these resolve their concerns.

Farm Business Assessment and Land Powers

30. John Fare occupies and runs a farming business from landholding 26, which includes the proposed site for the Morecambe substation and works connected with laying of cables. The Applicants seek compulsory acquisition powers in relation to this landholding. The Secretary of State notes that the Applicants' Farm Business Assessment(s) [REP6-182] and comments from Mr Fare's agent [REP6-222] were submitted at Deadline 6, and further submissions from the Applicants on this issue were contained in their Response to Rule 17 Letter [REP7-044] which was submitted at Deadline 7, at the close of the Examination. Given that these documents were submitted at a late stage in the Examination, the **Applicants** and **Mr Fare** are both requested to provide any further comments relating to the issues addressed therein. The **Applicants** and **Mr Fare** are requested to include an update as to whether any agreements have been reached between the parties through negotiations.

Land Use and Recreation

31. Queries were raised during the Examination regarding damage caused by vehicles undertaking pre-construction surveys along bridleway 5-5-BW-16. Noting the provisions of 2024 NPS EN-1 5.11.30-31, the **Applicants** are requested to clarify whether the dDCO or supporting documents provide a process ensuring that adverse impacts to public rights of way, including impacts arising during pre-construction works, both within and outside the Order limits, are remedied in a timely manner. If there is not such a process, the **Applicants** are requested to provide some proposed drafting to address this.

Historic Environment

32. The Secretary of State notes that the Examination considered the potential for adverse effects upon Hesketh Farmhouse, and he notes the potential for cumulative effects on this asset resulting from the Proposed Development alongside other planned works to the Penwortham substation outside of the current application. The **Applicants** are requested to confirm whether any information is available relating to the environmental impacts of the proposed works to the substation and whether they can undertake an assessment of the cumulative effects on Hesketh Farmhouse in light of the information available at this time.

Funding for the Morgan Offshore Wind Project

33. The Applicants' letter of 30 January 2026 [PID-001] noted that Morgan Offshore Windfarm's parent companies have decided not to proceed with the Agreement for Lease for the Morgan Offshore Wind Project. The Applicants stated that The Crown Estate is considering next steps, with the aim to ensure the continued development of the site by another developer, and that The Crown Estate views the Morgan Offshore Wind Project as a continuing and live project.

34. **Morgan Offshore Wind Farm Ltd** is requested to provide detailed information regarding its viability, and the necessary funding to underpin both the compulsory acquisition (CA) powers sought and any potential claims for blight, and to explain whether the dDCO provides a clear mechanism to guarantee the necessary funding or whether further wording is required. **Morgan Offshore Wind Farm Ltd** is requested to provide updates to any relevant documents, including tracked change versions, such as the Funding Statement.

35. **The Crown Estate** is requested to provide further information regarding if and when another developer can be found for the Morgan Offshore Wind Project. **The Crown Estate** is requested to provide further information regarding any funding or guarantee mechanisms which could be made available to ensure that financial liabilities (such as CA powers or claims for blight) that may arise if the Secretary of State grants consent for the Morgan Transmission assets can be met.

Funding for the Morecambe Offshore Wind Project

36. During the Examination, concerns were raised regarding whether Morecambe Offshore Windfarm Limited has adequate funding to meet any blight claim [EV5-

003], [EV5-006], [PD-011], [EV11-006] due to significant impacts to farm businesses [APP-104]. The only assets being offered by the Applicant are an intercompany loan repayable on demand, which any affected individual may be unable to rely upon prior to the commencement of construction. The Applicant referred in the Examination to article 33(2) in the dDCO in this regard, but the Secretary of State notes that this does not provide a mechanism for compensation to an affected party for a blight claim if the DCO is granted, but powers of CA and temporary possession have not been exercised. The information in section 1.2 of the Statement of Reasons [REP6-018] relates solely to Morgan Offshore Wind Farm with the only reference to Morecambe Offshore Wind Farm being in paragraph 1.1.1.3. **Morecambe Offshore Windfarm Limited** is requested to provide further information to demonstrate that adequate funding will be available both for CA and acquisition resulting from blight. The Statement of Reasons is required to be amended and any other relevant documents.

Land Powers

37. The **Canal and River Trust** and the **Applicants** are requested to provide updates regarding whether protective provisions have been agreed, and whether the Canal and River Trust have any outstanding objections [REP7-056].
38. **Blackpool Borough Council** and the **Applicants** are requested to provide an update on negotiations relating to temporary possession powers in respect of the access to St Annes Beach via Starr Gate [REP4-130], [REP5-164], [REP7-045], including whether agreement has been reached in this regard.
39. The **Applicants** and **Agents SHP Valuers acting for Greenbank Farm** are requested to provide an update, including whether agreement has been reached in relation to rights of access sought by the Applicants at Greenbank Farm [REP6-216, REP7-042].
40. The **Applicants** and the **Affected Parties at Eastham Hall Farm** are requested to provide an update on their position in respect of the rights sought over this land, including whether an agreement regarding an alternative solution has now been reached [REP5-196].
41. The **Applicants** and **Blackpool Borough Council** are requested to provide an update on the progress of ongoing negotiations in relation to rights sought by the Applicants over the Blackpool Airport site and whether an agreement has been reached between the parties.
42. The **Applicants** are requested to provide any further updates regarding any other land right agreements.

Land Powers for Biodiversity Benefit Land at Lea Marsh

43. The potential exercise of CA powers for the biodiversity benefit land at Lea Marsh was discussed during the Examination [REP7-055]. The **Applicants** are requested to clarify for which plots of land at Lea Marsh compulsory purchase powers are sought solely for providing biodiversity net gain. The Applicants are asked to clarify

any consequent changes which would be required to be made to the dDCO and any other documents should the biodiversity benefit land at Lea Marsh be excluded from the CA powers in the order.

Section 106

44. The **Applicants** and **Fylde Borough Council** are requested to provide further information regarding whether Section 106 agreements relating to Blackpool Road Recreation Ground have been completed. In its 27 January 2026 letter, the Council stated that it has asked the Applicants to enter into a deed of indemnity in favour of both the Council, as leaseholder, and Lytham Town Trust Ltd, as freeholder, enabling the Council to enforce the agreement against the Applicants and their successors in title. The Council has also requested that wording is added to Article 6 of the dDCO providing that the benefit of the order cannot be transferred unless (i) a deed of covenant has been entered into between the lessee or transferee of the benefit and the Council, regarding the performance of obligations under the Section 106 agreement, and (ii) a deed of indemnity has been provided to indemnify the Council in respect of the Section 106 agreement. The **Applicants** are requested to comment on any progress made towards agreeing the wording of the Section 106 agreement, the Council's request for an indemnity and the Council's proposed amendment to Article 6 of the draft Development Consent Order.

Crown Land

45. The **Duchy of Lancaster, His Majesty's Coastguard, the Secretary of State for Transport** and the **Applicants** are requested to confirm whether any outstanding matters have been resolved in respect of compliance with Section 135 of the Planning Act 2008 [REP7-040]. If consent is not obtained, Crown land plots will need to be removed from the scope of the CA provisions.

46. During the Examination the Applicants were unable to clarify whether plots 16-107B, 16-108B, 16-109A, 16-110A, 16-111B, 16-112B, 16-113A, 16-114, 16-115, 16-116A, are owned by the Duchy of Lancaster or by Hesketh Farms Limited. The **Applicants** and the **Duchy of Lancaster** are requested to clarify ownership of the landholdings.

Public Sector Equality Duty

47. The Applicants' Public Sector Equality Duty impact assessment was updated at D6 [REP6-133] to reflect discussions with the Wrea Green Equitation Centre and include updates to the outline Communications Plan [REP6-069] and outline Construction Noise and Vibration Management Plan [REP6-083]. Due to the late submission of the final mitigation proposals, Wrea Green Equitation Centre did not have the opportunity to comment. **Wrea Green Equitation Centre** is requested to provide comments on the updated impact assessment.

DEADLINE FOR RESPONSE

48. **The deadline for response is 23:59 on 13 April 2026. Responses should be submitted by email only to:**

morganandmorecambeowfta@planninginspectorate.gov.uk.

49. Responses will be published on the Morgan and Morecambe Offshore Wind Farms Transmission Assets project page of the National Infrastructure Planning website as soon as possible after **13 April 2026:**

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032>

50. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the Proposed Development or any part of the project. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully,



John Wheadon

Head of Energy Infrastructure Planning Delivery & Innovation

Department of Energy Security & Net Zero