



# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1**



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## Glossary

Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).

<b>Term</b>	<b>Meaning</b>
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.  Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).

Term	Meaning
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.  Also referred to in this report as the Offshore Order Limits, for ease of reading.
Transmission Assets Order Limits: Onshore	The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).  Also referred to in this report as the Onshore Order Limits, for ease of reading.

## Acronyms

Acronym	Meaning
AOD	Above Ordnance Datum
CoCP	Code of Construction Practice
CoT	Project Commitment
CfD	Contracts for Difference
CMS	Construction Method Statement
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DESNZ	Department for Energy Security & Net Zero
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
ES	Environmental Statement
EWG	Expert Working Group
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
IPs	Interested Parties
LONI	Letter of No Impediment
MCZ	Marine Conservation Zone
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OTNR	Offshore Transmission Network Review
SAC	Special Areas of Conservation
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance

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## Units

Unit	Description
%	Percentage
km	Kilometres
kV	Kilovolt
m	Metres

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# 1 Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1

## 1.1 Introduction

- 1.1.1.1 Following Secretary of State Consultation 1, Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') have taken the opportunity to review each of the submissions from Interested Parties (IPs).
- 1.1.1.2 Details of the Applicants' response to each of the IP's submissions are set out in **Section 2** this document.
- 1.1.1.3 The Applicants have numbered the submissions in line with the Planning Inspectorate's references, with subsequent paragraph number, e.g. C1-002-1, C1-002-2, etc. Where appropriate, the relevant Secretary of State question number has also been included for submissions in response to the Secretary of State's letter (C1-001).
- 1.1.1.4 The Applicants also note that the Secretary of State decided on the 27 April 2026 to publish all the post-examination submissions received from 29 October 2025 to 29 January 2026. The Applicants have responded to these where appropriate in **Section 3**.

## 2 Applicants' Response to IPs' submissions at Secretary of State Consultation 1

### 2.1 Paul White (C1-002)

Table 2.1: C1-002- Paul White Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-002	Totally against any works of this nature in the Fylde Coast, and we the people should be listened to, not some [REDACTED] from down South, to whom it would not affect. Why should we have this mess, when there's no clear benefit to any of it for us in the area.	The potential benefits of the Transmission Assets, including energy generation and local economic contributions, have been assessed and set out in the Applicants' Closing Statement (REP7-042), Statement of Reasons (C1-029.19) and Section 4 of the Planning Statement (REP7-023).

### 2.2 Jennifer Gleave (C1-003)

Table 2.2: C1-003: Jennifer Gleave Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-003	Dear Powers That Be! Why on earth do you make it all far too difficult to understand whatever is going on? I am entirely against this project which is going to destroy so many acres of beautiful agricultural land and bring the Wrea Green Equitation Centre Business in to jeopardy.	The potential benefits of the Transmission Assets, including energy generation and local economic contributions, have been assessed and set out in the Applicants' Closing Statement (REP7-042), Statement of Reasons (C1-029.19) and Section 4 of the Planning Statement (REP7-023). Please refer to the response within row C1-008-01 regarding Wrea Green Equitation Centre.

### 2.3 SHP Valuers Residential Farm Commercial acting for Executors of the Late Deryck Lund and Michelle Fare (C1-004)

Table 2.3: C1-004: SHP Valuers Residential Farm Commercial acting for Executors of the Late Deryck Lund and Michelle Fare Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-004	39	<p>A meeting was held between Michelle Fare and SHP Valuers representing the landowner with Dalcour MacLaren and [REDACTED] representing Morgan Project on 15 January 2026 in which heads of terms were discussed for a Morgan only Option agreement for freehold acquisition for section of A583 haul road and temporary working area compound lease.</p> <p>1.2 Heads of Terms were signed on 26 January 2026 made without prejudice and subject to contract, we may therefore not disclose the contents of those terms.</p> <p>1.3 On 3 February 2026 Dalcour MacLaren circulated a Cancellation Notice of a Landowner engagement event ....Following our recent invitation to the landowner engagement event scheduled for 10th February 2026, we are writing to inform you that the event has been cancelled due to limited uptake.</p> <p>1.4 On 3 February 2026 Dalcour MacLaren also circulated a letter stating.... <i>Following recent announcements from JERA Nex bp and EnBW regarding the Morgan Offshore Wind project, Morecambe Offshore Windfarm Ltd can confirm that Morecambe Offshore Windfarm is progressing as planned with its development and delivery, in compliance and coordination with all statutory requirements and regulations..... We recognise this may raise questions about potential implications for any land agreements. We would like to reassure landowners that we are currently reviewing the position in detail and will contact relevant parties directly as soon as further information becomes available.</i></p> <p>1.5 Our client has seen no progress with option agreements for freehold acquisition or temporary working area compound lease following signing of heads of terms which relate solely to the Morgan Project and we have been advised that this is permanently on hold.</p>	The Applicants can confirm they have received a signed copy of heads of terms from Executors of the Late Deryck Lund and Michelle Fare and once the Morgan project is in a position to progress the terms will be duly signed and progress into the legal option stage.

Reference	SoS point	IP submission	Applicants' response
		<p>1.6 On 4 March 2026 a meeting of Landowner Land Agents was arranged by Dalcour MacLaren to be held with Morgan Project and Morecambe Project. DM advised on 2 March 2026 that Morgan Project would not be in attendance.</p> <p>1.7 Minutes of the Landowner Land Agents meeting held on 4 March 2026 were circulated on 12 March 2026 by Dalcour MacLaren which insofar as Morgan Project is concerned the following relevant extracts advise; <i>All negotiations for the Morgan agreements are being paused and will be discussed at the point Morgan is recommenced..... Voluntary agreements are to be progressed on a bipartite basis (Morecambe only).... The option plans are being updated to remove any land or references to Morgan.</i></p> <p>1.8 We were invited to submit our time sheet for reimbursement of time spent with the Morgan Project which was submitted on 10 March 2026 and has since been settled.</p> <p>1.9 There has been no communication with Morgan Project team since.</p>	

## 2.4 Pete & Annette Sharkey (C1-005)

Table 2.4: C1-005 - Pete & Annette Sharkey Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-005-01	<p>We wrote to the Planning Inspectorate on 4/2/26 regarding the project update that had been provided by the Morgan and Morecambe Offshore Wind Farms Transmission Assets (M&amp;M). Our Interested Party numbers are and respectively for Pete &amp; Annette Sharkey. We note that there has now been a request for information on the two project updates (provided by the applicants) from the Secretary of State (SoS) on the 12th of March to a list that includes interested parties. This is our response.</p> <p>From our personal viewpoints the key points are:</p>	The Applicants note this response.
C1-005-02	<p>Landscape and Visual.</p> <p>Despite raising this at the hearings and repeated requests in writing regarding the visual impact, and lack of renderings. We still do not know if the substations will be dug in or raised up in the landscape to achieve the flat base that will be required. In the last information that we saw provided by M&amp;M the contours around the Morgan substation had been changed but there was nothing around Morecambe. As both substations are on sloped ground this appears to be incorrect. It is therefore not possible to know how effective any proposed screening would be</p>	<p>Landscape and visual matters are addressed in Section 11 of the Applicants' Closing Statement (REP7-042) and Section 1.6 of the Applicants' Response to Secretary of State Letter and Request for Information (C1-029.39).</p> <p>Please refer to the response within row C1-007-24 which addresses landscape matters.</p> <p>The Applicants also note that Mrs Sharkey submitted commentary on the same points at Deadline 4 (see REP4-145) as part of a post-hearing submission. A comprehensive response was provided by the Applicants in their Deadline 5 submission – see REP5-129, paragraphs 145.1 to 145.3.</p> <p>The Applicants have provided further information on proposed mitigation measures relating to landscape and visual impact in Section 1.6 of the Applicants Response to the Secretary of State (C1-029.39).</p>
C1-005-03	<p>Historic Environment</p> <p>We are the owners of one of the Heritage assets (listed Building) whose setting will be affected by the Morecambe substation. Only one Heritage Asset was mentioned under paragraph 32 by the SoS there are many others</p>	The Applicants' assessment of likely impacts and effects regarding the onshore and intertidal historic environment is set out in Section 8 of the Applicants' Closing Statement (REP7-042) and in Section 1.13 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39). All matters regarding the onshore historic environment, including the assessment of effects arising from change within the settings of designated heritage assets, are agreed with Historic England in their SoCG (REP5-088) and with South Ribble Borough Council in their SoCG (REP6-128).
C1-005-04	Noise - We are no further forward in understanding the expected noise levels that would impact us from the substations.	The Applicants would refer to Section 12 of the Applicants Closing Statement (REP7-042), which sets out how the noise and vibration assessment was undertaken, explains how noise mitigation has been secured for the construction phase in the draft DCO in order to minimise impacts, and finally confirms that FBC agrees, as set out in the SoCG, that Requirement 18 of

Reference	IP submission	Applicants' response
		Schedules 2A and 2B to the draft DCO (REP6-013), which provides the imposition of an operational noise limit for the substations, represents reasonable control of operational noise from the Onshore Substations (REP7-028).
C1-005-05	<p>Regarding the whole Development Consent Order application the other key points appear to be:</p> <ul style="list-style-type: none"> <li>- Lack of financial security</li> </ul> <p>In their 30/1/2026 project update the Applicants state regarding Morgan that “ it is considered reasonably foreseeable that the project will be developed”. No evidence whatsoever is presented to support this position. According to press reports the TCE lease for Morgan has been “lapsed” This was granted through open competition in Round 4. The re-auctioning of this lease has no guarantee of succeeding. Other press reports point to significant doubt as to whether Morgan will now be developed. The SoS questions still show concerns regarding funding for both Morgan &amp; Morecambe</p>	<p>The Applicants refer to their response to paragraph 35 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14), and to TCE’s response to paragraph 34 of the same. These responses confirm that TCE have now publicly announced (in a Press Release of 8 June 2026 - <i>The Crown Estate to launch tender for Morgan offshore wind site in the Irish Sea</i>) that they will commence the leasing process for the Morgan offshore wind farm site next month, with the intention of having a developer in place this year (end of 2026). This provides further assurance regarding the foreseeability of the Morgan site proceeding to be developed.</p> <p>Regarding funding of the Morgan Offshore Wind Project, the Applicants refer to their response to paragraphs 32 – 35 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14). This provides an update on the Applicants’ position in previous submissions, namely Section 1.14 of the Applicants’ Response to Secretary of State Letter dated 12 March (C1-029.39) regarding funding for Morgan, and Section 1.15 regarding funding for Morecambe.</p>
C1-005-06	<p>Harm v benefits balance</p> <p>Assuming Morecambe is accepted to go ahead alone, no mention is made about the lowering of the megawatt contribution to supply. The project, it was acknowledged at the Enquiry, leads to significant harms as well as benefits. Without Morgan, if that proves to be the case, then Morecambe only delivers 25% of the megawatt capacity (benefits), but the harms remain high</p>	The Applicant’s refer to the response in row C1-005-007 (see below).
C1-005-07	<p>Biodiversity Net Gain v Bird Strike risk to aviation</p> <p>This is a crucial conflict which does not have any resolution. The bird strike risk to BAE Warton (and the threat to safety, investment and our defence capability) versus the biodiversity net gain which has to be introduced.</p>	The Applicants refer to their response to paragraphs 17, 18, 21, and 22 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14).
C1-005-08	<p>Site Selection</p> <p>If Morecambe is accepted to go ahead alone, there will be a lowering of the megawatt contribution to supply. The project, it was acknowledged at the Enquiry, leads to significant harms as well as benefits. Without Morgan, if that proves to be the case, then Morecambe only delivers 25% of the megawatt capacity (benefits), but the harms remain high. This balance has altered if only Morecambe goes ahead. This is a consideration not mentioned by the Applicants. If the Morecambe substation goes ahead on its own the smaller site may well have been placed elsewhere.</p>	The Applicant’s refer to their response to paragraph 35 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14), and specifically the section headed ‘ <i>Co-ordination and Good Design</i> ’, which sets out why the site selection conclusions would remain robust for Morecambe proceeding alone.
C1-005-09	<p>Viable Alternative connections to the National Grid</p> <p>The evidence regarding the alternative connection at Stanah &amp; Hillhouse mounts. The failure to consider the Green Book exercise promoted by Lancashire CC, Fylde BC and Wyre BC. Plus the Mona offshore Windfarm has now been allowed to pursue the Stanah alternative connection.</p>	As noted in the Applicants Decision Stage Update Letter to the Secretary of State issued on the 30 January 2026 (S_SoSQ_1), the Applicants reiterate that each project was separately offered a grid connection agreement for a connection to the existing National Grid substation at Penwortham. The Applicants each accepted and entered into their connection agreements. National Grid has confirmed in its response to Examining Authority questions (REP3-088, page 1) that the alternative Point of Interconnection at Stanah is not possible. The Applicants note that National Grid has subsequently confirmed in correspondence (by email of 25 March 2026) that the Applicants that “ <i>National Grid’s examination response applies equally to the Morecambe and Morgan projects, individually and jointly, and remains unchanged.</i> ” It is also notable that the proposed East Irish Sea Transmission Project has a recently provided connection at Penwortham, not Stanah, further highlighting the unsuitability of this connection point. The Applicants have addressed this

Reference	IP submission	Applicants' response
		matter in detail in Section 2.2 of the Applicants' Closing Statement (REP7-042).
C1-005-10	These are not the only the only adverse impacts that are still unresolved or unmitigated. There are many that will be covered in other representations. The sheer volume of unresolved issues at this stage of the process demonstrates the need for rejection or withdrawal.	The Applicants' detailed position is set out comprehensively in their Examination submissions and the Applicants conclusion on this matter is presented in their Closing Statement (REP7-042)

## 2.5 Canal and River Trust (C1-006)

**Table 2.5: C1-006 - Canal and River Trust Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-006	37	<p>We write further in response to your letter dated 12 March 2026, in relation to a request for information on the above matter.</p> <p>The query for the Canal &amp; River Trust (The Trust) is no.37 below.</p> <p>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</p> <p>The Trust can confirm that the draft Development Consent Order, submitted at Deadline 6 of the Examination by the Applicant (Document Number MRCNS-J3303-BGS-10001A MOR001-FLO-CON-ENV-RPT-0020; Reference C1/F09 dated 22 October 2025), contains at Schedule 10 Part 12 the agreed protective provisions for the protection of the Canal &amp; River Trust. This matter has therefore been addressed.</p> <p>The only outstanding matter for the Canal &amp; River Trust relates to the land negotiations for rights over our leased land, Carter Jonas (our agents), were in discussion with Dalcour McClaren (the applicants' agents) in relation to the draft Heads of Terms (HoT). Despite requests for update on this matter, this has not been forthcoming.</p> <p>Please do not hesitate to contact me with any queries you may have.</p>	The Applicants note the Canal & River Trust's confirmation that the protective provisions at Schedule 10 Part 12 of the draft DCO (REP6-013) have been agreed. The outstanding matter regarding land negotiations is noted and the Applicants continue to engage with the Trust's agents.

## 2.6 Angus Walker on behalf of Parish Councils (C1-007)

**Table 2.6: C1-007 - Angus Walker on behalf of Parish Councils Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-007-01		This is a response to the Secretary of State's 12 March 2026 request for information on behalf of Newton-with-Clifton and Freckleton Parish Councils, for whom TLT acts.	The Applicants note at the outset that many of the matters raised by the Parish Councils have been thoroughly considered during the Examination and in the Applicants' Closing Statement (REP7-042), the Applicants' Response to the Secretary of State's letter and information Request dated 12 March 2026 ("the Applicants' Response") submitted on 13 April 2026 (C1-029.39). This commentary should be read in conjunction with those documents. The Parish Councils Submission does not raise any new issues beyond those already thoroughly considered during Examination and in the Applicants' post-Examination submissions. The Parish Councils' assertion that the application should be refused unless all issues are resolved does not reflect the legal framework under the Planning Act 2008. The outstanding matters are capable of being addressed through the robust framework of DCO requirements, and the Applicants have demonstrated several workable approaches to resolving the key areas of disagreement.

Reference	SoS point	IP submission	Applicants' response
C1-007-02		These parties took an active part in the examination of the application and made many submissions on the issues identified in the letter. While the Parish Councils are pleased that the Secretary of State has correctly identified all the issues surrounding this application that are still outstanding, the number and significance of the issues with only 16 days remaining before a decision was due to be made is extremely concerning. The deadline has now been delayed for another 15 days, not because of the unresolved issues but because of the local elections. 31 days is still far too short for these issues to be considered properly and resolved.	The Applicants welcome confirmation that the Parish Councils agree that the Secretary of State has identified all matters to be considered.
C1-007-03		The Parish Councils submit that unless all of these issues are resolved by the time a decision is taken the application should be refused, as each unresolved issue that remained corresponds to one or more unmitigated adverse impacts of the project, which together significantly outweigh its benefits.	The Parish Councils' assertion that the application should be refused unless all issues are resolved does not reflect the legal framework under the Planning Act 2008. The outstanding matters are capable of being addressed through the robust framework of DCO requirements, and the Applicants have demonstrated several workable approaches to resolving the key areas of disagreement, as set out in the Applicants' Closing Statement (REP7-042) and the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39).
C1-007-04		Even if you are minded to grant the application, as the developers of the Morgan offshore windfarm have withdrawn their support for that project, there is no longer a compelling case in the public interest to grant compulsory acquisition powers for the Morgan elements of the project and so they should be removed from the application, as should the powers to build them which would not be able to be exercised.	<p>The Applicants have confirmed in their response to paragraph 32 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), that this decision is a matter for the Secretary of State. If the Secretary of State were minded not to grant compulsory acquisition powers to Project A (Morgan), the development consent would be granted for both the Morgan and Morecambe Transmission Assets, but compulsory acquisition powers granted for the Project B (Morecambe) elements alone.</p> <p>The Applicants' response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14) goes on to explain why the Morgan project would remain viable in planning terms for an alternative company, should development consent be granted for the Morgan transmission without any compulsory acquisition powers.</p>
C1-007-05		If just the Morecambe onshore elements are needed then that calls into question the site selection process as the main driver for it was finding a site for the much larger Morgan substation and locating the Morecambe substation nearby. On that basis the choice of site for the Morecambe substation alone is seriously flawed, the applied-for route is no longer justified and the application should be refused.	The Parish Councils' contention that the choice of site is "seriously flawed" if only the Morecambe elements proceed is without foundation. The site selection exercise was robust and comprehensive, and a one-project-only scenario was always assessed and planned for, as set out in the Applicants' Decision Stage Update Letter to the Secretary of State (S_SoSQ_1) and in Section 2.2 of the Applicants' Closing Statement (REP7-042). The Applicant's further refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), and specifically the section headed 'Co-ordination and Good Design', which sets out why the site selection conclusions would remain robust for Morecambe proceeding alone.
C1-007-06		Furthermore, the Morgan windfarm would have generated more than 75% of the total electricity produced by the two projects (1500MW vs 480MW), so the benefits of the application have diminished by 75%, which should also be taken into account in deciding whether to grant consent even for the reduced project.	The Parish Councils' assertion that the benefits have "diminished by 75%" is misleading. The Morecambe project alone is a Critical National Priority infrastructure project in its own right, contributing 480 MW of new offshore wind capacity. The Applicants have demonstrated that the positive benefits of the Transmission Assets outweigh any residual adverse impacts for all three assessed scenarios, including the Morecambe-only scenario.
C1-007-07		Given the number of questions that have been asked of the Applicants and other parties in the letter, the Parish Councils consider that there should be an opportunity for them and other parties to respond to any submissions received by 13 April, with at least a week to do so given their likely volume, otherwise such untested submissions should carry little weight.	The procedure for consultation on post-Examination submissions is a matter for the Secretary of State though noted that this comment was made prior to the Secretary of State extending the deadline for determination of the Application.
C1-007-08		In addition there is no acknowledgement of the range of points made by the Parish Councils and others about the "alternative route" scenario, which would reduce total costs of the scheme by £900m, and significantly reduce the environmental impact. In particular we would like to draw the attention of the Secretary of State to the Green Book	The Applicants note this response is directed at the Secretary of State and confirm that no party has provided the Applicants with a copy of "the Green Book exercise". The Applicants have provided detailed justification as to why

Reference	SoS point	IP submission	Applicants' response
		exercise that Fylde BC, Lancashire CC and Wyre BC are carrying out at present. It would be regrettable if an alternative with nearly £1bn reduced costs and significantly lower environmental impacts yet achieving the same aim could not be considered due to the siloed responsibilities of the regulators involved.	the selected route to the National Grid connection point at Penwortham is the most suitable, as set out in Section 2.2 of the Applicants' Closing Statement (REP7-042) and in Volume 1, Chapter 4: Site Selection of the Environmental Statement (APP-033). The Applicants note that National Grid has subsequently confirmed in correspondence (by email of 25 March 2026) that the Applicants that "National Grid's examination response applies equally to the Morecambe and Morgan projects, individually and jointly, and remains unchanged."  The Applicants refer to the response at C1-005-09 of this submission.
C1-007-09	3	Our comments on the letters from the Applicants dated 30 January 2026 and 12 February 2026 are as follows.	The Applicants note this response.
C1-007-10		The 30 January letter says that the Crown Estate views the project as continuing; that is hardly determinative of the matter. It would be helpful to know if a lease had been entered into for the Morgan windfarm and if not, when the annual fee to maintain the option had last been paid and by whom.	The Applicants refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), and to TCE's response to paragraph 34 of the same. These responses confirm that TCE have now publicly announced (in a Press Release of 8 June 2026 - <i>The Crown Estate to launch tender for Morgan offshore wind site in the Irish Sea</i> ) that they will commence the leasing process for the Morgan offshore wind farm site next month, with the intention of having a developer in place this year.
C1-007-11		The letter says that it is common for the developer to change in the course of the development of an offshore windfarm. We would disagree that it was 'common' and request that the Applicants justify this statement. In the cases where a developer has changed, it has been a changeover straight from one to another via a commercial agreement, not a withdrawal and a gap, of over two months so far, with no replacement identified yet, which we believe to be unprecedented while a DCO application is being considered.	The Applicants have already set out their position in their update letters sent to the SoS on the 30 January and 12 February 2026.
C1-007-12		The next two pages explain how independent the projects are in terms of consenting powers. In that case it should be reasonably straightforward to separate the two and only grant permission for the Morecambe elements should the Secretary of State be minded to consent that element of the project rather than automatically granting permission for the Morgan element without proper justification.	The Applicants welcome the confirmation that consent should be granted for Morecambe Transmission Assets. With regard to the consent for Morgan, the Applicants refer to their response to paragraphs 32 - 35 of the most recent SoS Rfl 2 (S_SoSQ_14).
C1-007-13		Finally, the letter says 'as noted above it is reasonably foreseeable that the [Morgan] project will be developed'. That is not in fact noted earlier in the letter and it is difficult to see how it can be reasonably foreseeable that a project with no identified developer over two months since its previous developer withdrew will be developed.	The Applicants refer to their response within row C1-007-10 of this submission.
C1-007-14		The 12 February letter provides an update on outstanding issues but there has been hardly any movement on them since the end of the examination, as evidenced by the number of questions in your letter.	The Applicants note this response.
C1-007-15		On pages 10-11 it says that it is understood that GTC Pipelines, Network Rail and NGET have withdrawn their objections but there is no other evidence of this. On page 11 it says that only one option agreement has been concluded since the close of examination.	The Applicants refer to documents PIR-005, PIR-006, PIR-007 and PIR-008, which evidence the withdrawal of the objections.
C1-007-16		On page 12 a letter of no impediment is referred to, but the appended letter is not a letter of no impediment, it says that one will be issued if the application is of the required standard. The Applicants should provide further evidence to back up their claim.	Regarding the Letter of No Impediment (LONI) for sand lizards, the fourth paragraph of Annex 1 states that " <i>Natural England sees no impediment to a licence being issued, should the DCO be granted.</i> " This can therefore be considered a LONI. This is in line with the LONI received for Great Crested Newts (REP5-150). The Applicants will address Natural England's comments on the European Protected Species licence for sand lizards as part the licence application process.  As to the MMO's position on the Cable Burial Risk Assessment, as presented in the February update letter and technical note from the Applicants Annex 2: MMO letter in (S_D7_3), the MMO has confirmed that their final stance has been agreed, and no further actions are required from the Applicants.

Reference	SoS point	IP submission	Applicants' response
C1-007-17		As stated on page 15, the MMO have indeed agreed the appropriateness of the Cable Burial Risk Assessment. That is however only one of several concerns of the MMO, the remainder of which remain outstanding.	The Applicants note this response.
C1-007-18		The Parish Councils are not directly involved in this issue, but it is a crucial conflict that cannot be resolved unless new land for environmental mitigation is provided far enough away from the aerodrome as not to increase bird strike risk. The Applicants have not changed their application to do this, and so it remains the case that either bird strike risk is increased by the project, or proposed environmental mitigation is reduced. If the former, the application has not been designed not to increase bird strike risk contrary to paragraph 5.5.42 of EN-1; if the latter then the Secretary of State should be careful to assess and take into account the consequent reduction in benefits of the project and the adequacy and effectiveness of mitigation.	The Applicants refer to their response to paragraphs 17, 18, 21, and 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-007-19		The Parish Councils consider that the outline Wildlife Hazard Management Plan does not contain sufficient secured safeguards to reduce the risk of wildlife hazards to an acceptable level, both in terms of the triggers/thresholds for active measures, that the measures will actually be carried out and what happens in the meantime, and what happens if the measures do not reduce the risk to an acceptable level, e.g. should the environmental areas be removed and the project cease until replacements are found elsewhere? This is not a trivial matter as it could cause a major accident.	The outline Wildlife Hazard Management Plan (WHMP) will be updated post-consent, pursuant to Requirement 27 of Schedules 2A and 2B to the draft DCO (REP6-013), prior to the undertaking of any construction works. In preparing the detailed WHMP, the Applicants are obliged by Requirement 27 to consult with the statutory nature conservation body, the Ministry of Defence, BAE and BAOL. The Applicants therefore consider that there is sufficient opportunity for the relevant aviation stakeholders to provide the input for any points which they deem necessary in the detailed WHMP, during the post-consent phase. The Applicants refer to their response to paragraphs 21 and 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-007-20		Furthermore, the Parish Councils believe that the HNDR missed both risk for Blackpool Airport and Warton Aerodrome entirely. If the HNDR had been completely fully then under NPS EN1 Section 5.5: Para 5.5.41 a 13km exclusion zone from the airports would have applied to the substations, resulting in a change to the Applicants BRAG ratings for the substation sites and them being proposed in different locations.	<p>The Applicants note that a full and comprehensive assessment of bird strike risk has been carried out and would emphasise that Blackpool Airport confirmed it is satisfied with the risk assessment and mitigation measures and has withdrawn its representations.</p> <p>The Applicants note that paragraph 5.5.41 of EN-1 does not propose the need for a 13km 'exclusion zone'. This paragraph states the importance of ensuring that <i>"infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km"</i>. This policy, therefore, simply requires that the design of any infrastructure (including mitigation) within this 13km radius does not increase the bird strike risk. It is therefore not correct to suggest that the HNDR process was not compliant with policy.</p> <p>With regard to the design and proposals for the Transmission Assets, the obligation to deliver a Wildlife Hazard Management Plan (Requirement 27 of Schedules 2A and 2B to the draft DCO (REP6-013)) will ensure that there is no increase to the risk of bird strike, and the Applicants would emphasise that they are obliged to consult with the Ministry of Defence, BAE and BAOL when preparing this. The Applicants also refer to their response to paragraphs 21 and 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>
C1-007-21		The question at paragraph 13 is symptomatic of the bird strike / environmental mitigation conflict. If, which the uncertainty around wildlife hazards suggests will be the case, Natural England cannot conclude whether the project is likely to have a significant effect on the Ribble and Alt Estuary SPA or not, then an appropriate assessment will have to be undertaken.	<p>The Applicants refer the Parish Councils to Section 1.4 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39), and to Section 5.3 of the Applicants' Closing Statement (REP7-042), where HRA matters including the appropriate assessment for the Ribble and Alt Estuary SPA are comprehensively addressed.</p> <p>The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>

Reference	SoS point	IP submission	Applicants' response
			The Applicants would refer to their response at row C1-007-18 of this submission.
C1-007-22		If an appropriate assessment cannot rule out adverse impacts on the SPA, then it would not be open to you to conclude that the project must be carried out for imperative reasons of overriding public interest because there is an obviously material alternative solution without any impacts on international sites, namely to route the cables for 2km from the shore to the Stanah substation to the north rather than 30km from the shore to Penwortham substation. This alternative was put before the examination on several occasions.	<p>This argument is misconceived. As set out in various previous submissions from the Applicants, the connection point at Stanah is not available. National Grid has confirmed this (REP3-088), and the hypothetical northern route does not meet the site selection criteria. The Applicants note that National Grid has subsequently confirmed in correspondence (by email of 25 March 2026) that the Applicants that "<i>National Grid's examination response applies equally to the Morecambe and Morgan projects, individually and jointly, and remains unchanged.</i>" There is accordingly no obviously material alternative solution as the Parish Councils assert.</p> <p>Please refer to row C1-005-09 of this submission.</p> <p>Natural England has confirmed in writing (letter dated 11 March 2026, referenced in Appendix C of C1-029.39) that it can fully rule out adverse effects on integrity for temporary impacts on all features under each of the three construction scenarios considered, irrespective of the final positions from BAE/DIO regarding the mitigation areas. For permanent impacts, as set out at response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14) as of a meeting on 19 June, Natural England's advice is that AEoI on Ribble and Alt Estuaries SPA can be ruled out without reliance on mitigation, on the basis that the substation sites are unlikely to comprise Functionally Linked Land.</p>
C1-007-23		The Parish Councils' only comment in this area is to note the number of unresolved issues that remain five months after the examination ended.	The Applicants would refer to their response at row C1-007-03 of this submission.
C1-007-24	24	The Parish Councils are particularly concerned about the visual impact of the substations as they are very close to residential and other properties within the parishes. They have been calling for renderings and/or photomontages since 2023 to show the visual impact of the substations on residential receptors, but these have never been provided, despite assurances from the Applicants during the hearings. It is unclear if the substations will undulate with the existing land levels, be raised above or dug below existing levels so that they are flat (since they are sloping sites). If this is not known then renderings of all three types should be provided and the worst case impacts assumed according to the 'Rochdale envelope' principle.	The Applicants note the Parish Councils' response. In response, the Applicants note that these matters have been addressed continually throughout the Examination; with the Applicants submitting responses to the Examining Authority's Written Questions; local authorities and Interested Parties submission; and through the Hearing sessions at which landscape and visual matters have been discussed. The Applicants' final position is also set out in Section 11 of the Closing Statement (REP7-042). The Applicants also note that the Parish Councils submitted commentary on the same points at Deadline 4 (see REP-167) as part of a post-hearing submission. A comprehensive response was provided by the Applicants in their Deadline 5 submission – see REP5-129, paragraph 167.4).
C1-007-25		Without such renderings, this is an obviously essential feature of visual impact that has not been adequately assessed or limited by secured mitigation measures. It is also not presently possible to assess whether any proposed screening will actually screen the substations from residential receptors and how long it will take to establish – any gaps in screening and delays in effectiveness should be considered adverse impacts of the project.	
C1-007-26	25	The Parish Councils agree with the implication that no activities, mobilisation/demobilisation or otherwise, should take place outside the stated construction hours.	The Applicants note this response. Please refer to section 1.7 in The Applicants response to Secretary of State letter and Request for Information (C1-029.39) for more information.
C1-007-27	26	The Parish Councils note that since the examination the Environment Agency has issued further flood data in its 'Flood Zones plus Climate Change' series1 (issued 27 August 2025) to which regard should additionally be had. Furthermore, the Applicants have already caused flooding and damage to land drains from their preliminary investigations on two separate occasions.	Please refer to section 1.5 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	SoS point	IP submission	Applicants' response
C1-007-28	27	The Parish Councils support the proposed amendment to requirements 26 to prevent the works from starting rather than just the biodiversity benefit works as this is more in line with the spirit of the biodiversity net gain regime which is a pre-commencement regime.	The Applicants note this response.
C1-007-29		The Parish Councils reiterate that although BNG is not yet a statutory obligation for NSIPs this project falls well short of others that have been consented since BNG for NSIPs was in prospect. The cable route has been omitted from BNG calculations altogether and while its habitat loss will be temporary, it could be over 40 years before some of it is restored to its current condition on the Applicants' own figures. This is partly because the Applicants are allowing a maximum separation in time for the two projects of seven years plus the estimated three years for building the second project (which would not be time-limited) then plus over 30 years for some of the identified habitats to be fully restored. It would hardly be within the spirit of the BNG regime to exempt temporary uses that are longer than the 30-year obligation to provide habitat.	The Application is not subject to a mandatory requirement for BNG but the Applicants have undertaken a voluntary BNG assessment for the permanent infrastructure elements and are committed to delivering at least 10% in biodiversity benefit either through habitat enhancement at Lea Marsh Fields, local nature recovery schemes, or the purchase of biodiversity credits. The cable route has not been included in BNG calculations because the land will be reinstated post-construction, applying best practice techniques frequently applied to other cable installations, and the impacts are temporary in nature as accepted by the Parish Councils.
C1-007-30	28-29	The Parish Councils do not comment on this area.	The Applicants note this response.
C1-007-31	30	The Parish Councils' only comment on this topic is to note that 75% of Mr Fare's farmland will be lost to the project and will mean his entire farm would no longer be a going concern.	As set out in the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39), expert evidence has been submitted which demonstrates the continued viability of the farming enterprise at a reduced scale, so long as support measures are provided. The Applicants have completed two detailed farm business assessments (REP6-182; REP7-042) and have confirmed their willingness to compensate at a level allowing for full vacant possession and the purchase of an alternative farm on a freehold basis.
C1-007-32	31	The Parish Councils not only support public rights of way being remedied in a timely manner but also public and private highways that are used for the project. In their pre-consent activities the Applicants' machinery has already become stuck on local highways, which emphasises the need for remediation. The councils have made the point that if there is separation between the projects such damage should be remedied in between rather than their residents having to continue to suffer adverse impacts even when there is no construction.	Please refer to section 1.12.2 in The Applicants response to Secretary of State letter and Request for Information (C1-029.39).
C1-007-33	32	The Parish Councils' only comment on this point is to note that all cumulative impacts on historic sites should be assessed, not just Hesketh Farmhouse.	The Applicants note identification of designated heritage sites, including those within 5km of the onshore substations, are presented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-096). The mitigation measures and monitoring outlined in Volume 3, Chapter 5: Historic environment and the Commitments Register (C1-029.22) are appropriate and will ensure significant effects to heritage assets are avoided.
C1-007-34	33-35	The Parish Councils reiterate the points made at the start of this response: there is currently no compelling case in the public interest for granting compulsory acquisition powers for land that will only be used for the Morgan transmission assets.	The Applicants refer to their response at row C1-007-04 of this submission.
C1-007-35		As the Secretary of State implies, since the application was made, the Applicants are required to fund any successful blight claims that are made. If the companies behind the Morgan part of the project have withdrawn, who will pay for such claims for that part of the project? This adds to the case that that element of the project should not be consented.	The Applicants refer to their response at row C1-007-04 of this submission.
C1-007-36	36	As the Secretary of State implies, the guarantee of funding for blight claims for the Morecambe part of the project is also unclear, even though it still has an identified promoter. The Parish Councils support the request for the identity of who would pay such claims and sufficient security that they are required to do so to be provided.	The Secretary of State makes no such implication, with respect to funding for the Morecambe project. Copenhagen Infrastructure Partners has provided a letter of comfort to demonstrate that the necessary funds are available to meet any CA liabilities (REP6-180). The Applicants also refer to their response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S SoSQ 14).
C1-007-37	37-42	As well as the requested information, the Parish Council requests evidence that GTC Pipelines, Network Rail and NGET have withdrawn their objections, as mentioned in the 12 February Applicants' letter.	The Applicants refer to documents PIR-005, PIR-006, PIR-007 and PIR-008, which evidence the withdrawal of the objections.

Reference	SoS point	IP submission	Applicants' response
C1-007-38	43	The Parish Councils agree that for any land that is just required for biodiversity net gain, it is first questionable whether compulsory acquisition powers can be granted for it given that BNG is not yet mandatory, but in any event a compelling case in the public interest cannot be made out for it given the existence of a register of willing biodiversity unit landowners with the availability of statutory biodiversity credits as a fallback position.	The Applicants BNG offering is voluntary and are grateful to the Parish Councils for confirming the range of delivery methods are acceptable. Through amendments to Articles 20 and 22 of the draft DCO (REP6-013), the Applicants have tied the extent of land to be acquired within the biodiversity benefit areas to the details approved in the Biodiversity Benefit Management Plan, secured by Requirement 26 of the draft DCO, ensuring the test of necessity is met.
C1-007-39	44	The Parish Councils' only comment on this point is that correspondence received by the Secretary of State (e.g. the 27 January 2026 letter from Fylde Borough Council) should be published so that interested parties can take it into account in any responses they give, otherwise the process is not fully transparent and unbiased.	The Applicants note that the letter from Fylde Borough Council has been published by the SoS (PIR-009).
C1-007-40	45-46	The Parish Councils' only comments on this point are to establish whether the project can be constructed without the 40 or so unagreed Crown land plots being able to be acquired and that the Applicants should really know by know whether the ten plots referred to are Crown land or not.	Please refer to the response from the Duchy of Lancaster (C1-031).
C1-007-41	47	The Parish Councils support the Equitation Centre in raising issues around the Public Sector Equality Duty.	Please refer to the response within row C1-008-01.

## 2.7 Wrea Green Equitation Centre (C1-008)

Table 2.7: C1-008 - Wrea Green Equitation Centre Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-008-01	47	<p>We write in response to your request for further information Public Sector Equality Duty 47. (D6 REP6-133)</p> <p>Regarding;Morgan and Morecambe Offshore Windfarm ; Transmission Assets Public /sector equality statement 1.3.3.5</p> <p>The close proximity of the site compound in relation to our outdoor riding and grazing areas is attached to the proposed site, so fundamentally will impact this. Even though the company have agreed to erecting fence and have been promised a bund of significant height, this does not help us ascertain the level of noise and vibration. This is concerning from the horse's welfare, studies have shown that severe noise anxiety is reported to cause serious consequence, impacting both physiology (eg gastrointestinal signs) and these do not improve with time. As well as stress related behavioral responses whether ridden or not. Our large number of disabled riders ; disabilities include [REDACTED] would be put at great danger.</p> <p>Please find attached Noise anxiety in horses – from a Veterinary Centre.</p>	<p>The Applicants refer the Wrea Green Equitation Centre to the Public Sector Equality Duty Statement, which was updated and submitted at Deadline 6 (REP6-132). The Applicants understand the concerns raised and are confident that suitable measures can be put in place to ensure the Centre's activities can continue alongside construction.</p> <p>The Applicants have undertaken a specific equestrian noise study which has been submitted into examination at Deadline 6 (REP6-183). This study provides further information regarding the sensitivity of horses and users of the facilities to the activities proposed and identifies appropriate measures that will be adopted to mitigate the effects on both the businesses and their users with protected characteristics.</p> <p>The Applicants confirm their commitment to continued engagement with Wrea Green Equitation Centre (WGEC) throughout detailed design, as presented in the Outline Construction Noise and Vibration Management Plan (CNVMP) (REP6-083), the Outline Communications Plan (REP7-014) and Managing Construction Noise at Equestrian Receptors Technical Note (REP6-183). The Applicants further confirm that an equine veterinarian or other suitable specialist will be appointed to advise on mitigation measures during construction, and that this is detailed in the Outline CNVMP (REP6-083). The requirement to produce the detailed CNVMP, in accordance with the Outline CNMVP, is secured by Requirement 8(2)(c) of Schedules 2A and 2B of the draft DCO (REP6-013). This commitment (CoT79) is also recorded in the Commitments Register (F1.5.3/F08).</p> <p>The welfare of the horses and disabled riders are embedded within the Project's mitigation strategy through proactive engagement, specialist input, and enforceable management plans.</p>
C1-008-02		In addition to the site compound, Wrea Green Equitation Centre is on an agricultural B road with no passing places, linking two villages together. Resulting in chaos in delaying our riders being able to	The Applicants have assessed the potential impact of the Transmission Assets on vehicles, including emergency services, in Volume 3, Chapter 7:

Reference	SoS point	IP submission	Applicants' response
		attend their lessons on time which follow one another. Not to mention the emergency services being unable to have 24hour access. Whilst we are aware the company have said there will be traffic management ,this will increase travel time to and from us resulting in loss of business and high congestion in the area, impacting other local businesses including British Aerospace at Warton There are studies of the effects of wind turbines on horses we have seen no evidence or research of any compound built directly next to a horse riding business like ours. Until construction would commence we have absolutely no understanding of the effect on our lively hood and the communities that access us and the huge benefits this brings.	<p>Traffic and Transport (APP-108), which considers the impacts from the Transmission Assets traffic in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads. The assessment concluded that for all impacts once mitigation is implemented the effects would be not significant; as detailed in the respective Statements of Common Ground (SoCG) this was agreed with both National Highways (REP6-131) and Lancashire County Council (REP7-027) in their role as the local highway authority.</p> <p>To manage the potential impacts of construction of the Transmission Assets, the Applicants will apply the measures described in the Outline Code of Construction Practice (OCoCP) (REP6-067) and the associated management plans. This will include the production of detailed Construction Traffic Management Plans (CTMPs). The CTMPs will set out measures to ensure that the numbers of HGV movements are managed and monitored so that the numbers assessed in Volume 3: Chapter 7: Traffic and Transport (APP-108) of the ES are not exceeded. The requirement to produce the detailed CTMP(s) in accordance with the OCTMP is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (REP6-013). The CoCP(s) are secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP6-013). Detailed CoCP(s) will be implemented as approved by the relevant local planning authorities in consultation with the relevant statutory stakeholders, as appropriate.</p>

## 2.8 Keith McKay on Behalf of Freckleton Parish Council (C1-009)

Table 2.8: C1-009 - Keith McKay on Behalf of Freckleton Parish Council on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-009-01	<p>Dear Secretary of State EN020032 - Response to 12 March 2026 Request for Information Observations on the Process Issues Identified and Their Implications</p> <p><b>1. Introduction</b> I would offer some further observations relevant to this current application relating to the Transmission Assets for the Morgan &amp; Morecambe Wind Farms. The issues are related to process issues that can be identified from the material presented both prior to and during the recent Examination process. However, the comments offered here go further and examine the shortfalls that have been identified and the subsequent consequences, including some of the major issues that have been identified in the Secretary of States letter seeking further information.</p> <p>The issues relate to:</p> <ul style="list-style-type: none"> <li>• A possible system oversight failure of Ofgem's approach, including the impact of oversimplification in the HND process.</li> <li>• The consequence that has arisen relating to the issues of Bird Strike, particularly in relation to the operations of BAE Systems at the Warton Aerodrome, its primary test centre.</li> <li>• The consequent economic implications of possible decisions and the failure to support the required growth and regeneration required Nationally, but specifically in this corner of the Country.</li> </ul>	<p>The Applicants note Mr McKay's wide-ranging criticisms of OFGEM, HND, the role of NESO and National Grid and the system which has resulted in the Transmission Assets application being developed over the preceding 5 years. These matters fall outside the scope of the present DCO application. In so far as they relate to the merits of the application, the Applicants' position on site selection and the route to Penwortham is set out in Section 2.2 (in particular paragraph 2.2.3.10) of the Applicants' Closing Statement (REP7-042).</p>
C1-009-02	<p><b>2. Observations on a Possible Systemic Oversight Failure of Ofgem's Current Approach to Energy Connection</b> I write as a Chartered Engineering Fellow with 56 years' experience in aerospace systems development and integration, currently serving as Chair of the Registration Committee of the Royal Aeronautical Society and as a member of the Engineering Council Registration Standards Committee. I also serve as a Parish Councillor and Chair of Planning in Freckleton, Lancashire.</p>	<p>Please refer to the response within row C1-009-01.</p>

Reference	IP submission	Applicants' response
	<p>My professional background is in whole-system optimisation, risk management, and complex infrastructure integration. It is from that systems perspective that I raise a matter of serious concern regarding Ofgem's current oversight of electricity transmission connection arrangements in Lancashire.</p> <p><b>a. The Core Concern: Misalignment with Statutory Duty</b></p> <p>Under the Energy Act 2023 and the Electricity Act 1989, Ofgem's principal objective is to protect the interests of existing and future consumers — including through cost efficiency, security of supply, and support for Net Zero.</p> <p>The evidence emerging from the Fylde Coast offshore wind connection arrangements suggests that:</p> <ul style="list-style-type: none"> <li>Decision-making is being driven by minimisation of National Grid's designated network costs, rather than by</li> <li>Optimisation of total end-to-end whole-system cost to consumers, and</li> <li>Without transparent reassessment as project assumptions materially change.</li> </ul> <p>This creates a material risk that avoidable infrastructure costs — currently estimated at £1.5 billion — may be locked into the system and borne ultimately by consumers through Offshore Transmission Operator (OFTO) charges, constraint payments, and reinforcement works.</p> <p><b>b. Previous Attempts to Address the Issue</b></p> <p>A fellow Councillor from Newton with Clifton Parish, has previously attempted to engage Ofgem members regarding this issue. However, each time, he was directed back to the existing system approach, which seems to be the heart of the problem. Engagement with Ofgem, NESO, and DESNZ previously has met defensive responses, hindering opportunities for improved efficiency and coordination.</p> <p>This may stem from a mismatch between Ofgem's oversight requirements and the approach taken by NESO and NGET which seems to minimize costs for National Grid PLC, rather than consumers.</p> <p>More recent engagement with Ofgem, which is still ongoing, has so far resulted in the same form of response, which appears to deny responsibility by any party for minimising costs.</p> <p><b>c. Out of Date and Unresponsive Processes?</b></p> <p>The original HNDR process of 2022 appears to rely on a desk-based analysis, using now outdated or incomplete land and infrastructure data, failing to include available local knowledge relating to infrastructure and has not been revisited despite major project changes.</p> <p>There is failure to recognise the significance of the local airfields situated on the Fylde, although Blackpool Airport was recognised as a problem to be addressed. The military activities at Warton Aerodrome, which hold National Defence interest significance, are totally absent in the assessment, as have the significant passenger activities that associate with the Company business.</p> <p>Currently, multiple developers have each been directed toward use of 30km buried connections to the inland site at Penwortham. The potential for utilisation of the 138-hectare Hillhouse Technology Enterprise Zone, which already hosts the Walney 2 transmission structure, which is connected to Stanah appears not to have been properly assessed as a shared hub solution.</p> <p><b>d. Identification of Avoidable Consumer Costs</b></p> <p>Representatives from a group of Fylde Parishes, including myself, have identified an avoidable consumer cost of approximately £1.5 billion, due to the costs in creating these multiple new infrastructures, namely the Morgan &amp; Morecambe and Mooir Vannin projects, rather than prioritising reinforcement of the existing infrastructure as an alternative solution.</p> <p>There is evident systemic focus on minimising National Grid costs for a designated network rather than assessment of end-to end whole-system project costs of feasible options, particularly around lack of "prioritising reinforcement" of the existing infrastructure. This is not in accord with NESO's advice to Government. Developers appear to feel pressured into adopting routes to those National Grid PLC connections to which they have been directed to by NESO.</p> <p>This process did not account for the establishment costs for new generation and transmission assets, which are covered by system offshore wind project developers in assessing connection point options and minimising consumer costs at the project outset. Nor does it incorporate updates as new opportunities for infrastructure sharing emerge. Nevertheless, these costs are borne ultimately by the consumer upon grid connection through OFTO charges, along with any potential curtailment costs related to grid capability issues.</p> <p>Developers of the Morgan and Morecambe projects proposed a shared cable route to Penwortham substation, which NESO supported for reducing impacts; however, this was amended in the joint Transmission Assets DCO Application when it became clear that there were two separate projects in both design and time and the impact was not reassessed. Mooir Vannin was also directed to Penwortham without transparent evaluation of benefits. With Morgan now withdrawing but</p>	

Reference	IP submission	Applicants' response
	<p>maintaining its application—despite failing to meet Net Zero targets—there is a clear need for reassessment under changed conditions.</p> <p><b>e. Omission of Growth &amp; Regeneration Duties</b></p> <p>You may already be aware that Lancashire's Blackpool North and Fleetwood constituency is advancing their Gateway for Clean Energy (GfCE) initiative, which recognises the strategic opportunity to the offshore wind generation activity with regeneration of a highly deprived area. The Wyre peninsula forms an excellent exemplar area for adopting a regulatory innovation sandbox framework. With such a system perspective, there is also the opportunity to include green hydrogen generation and storage for the already granted DCO in the local area and the provision for the proposed GB-Isle of Man Inter-connector. These provide further energy balancing &amp; impact management opportunities, which in turn reduce network capacity and consumer costs. This also offers the opportunity to address frustrations in current processes and so enable the required consumer cost minimisation, growth and delivery of net zero targets, whilst still ensuring safe and sustainable development for all. Ofgem and NESO should be encouraged to be part of this concept and the benefits that are inherent with it.</p>	
C1-009-03	<p><b>3. Observations on Bird Strike Issues Raised During the Examination Process</b></p> <p><b>a. General Notes</b></p> <p>Bird Strike probability relates to the likelihood of collisions between birds and flying aircraft, which can cause significant hazard to the aircraft, the onboard personnel and persons on the ground, including risk of death. It is a particular concern for operation at or close to airfields.</p> <p>It is clear, from the questions that are being raised at present by DESNZ, that the issues relating to the possible impacts of bird strike probability on the Airfields and the whole of Fylde and West Lancashire local area are far from resolved.</p> <p><b>b. Impact of the HND Process and Recommendations</b></p> <p>Reviewing the available documents, there appears to be a consistent omission from the outset which may be critical to the whole discussion.</p> <p>The initialising document that selected the possible route was the Holistic Network Design Review<sup>1</sup>, which provided an initial identification of a possible route from the Irish Sea for a connection to the chosen National Grid substation at Penwortham, near Preston. This document did identify that there were issues to be overcome associated with Blackpool Airport, mainly associated with detail of the physical routing around this facility, but did not identify the risk zone associated with that operation or the significance of this. Equally, the omission of Warton Aerodrome, which maintains a military classified airspace zone, is a critical issue not reflected in the initial design selection nor the subsequent detail design activities.</p> <p>RAF Woodvale Airfield, at Ainsdale near Southport, was recognised as military and eliminated for this reason in this same document.</p> <p>This situation is reflected in the Environmental Impact Assessment Scoping Report.</p> <p>An AI word search in this document for Blackpool Airport confirms the reference to the physical aspects of the design at Blackpool.</p> <p>A similar search for Warton Aerodrome returns a negative result, although the maps included in reference 2 do indicate the existence of the facility, and Warton is mentioned as a Community Constraint in the HND, as a built area.</p> <p>Of note, RAF Woodvale, adjacent to Southport, is identified and therefore excluded</p> <p><b>c. NPS Requirements</b></p> <p>It is noteworthy that the issue relating to Bird Strike and the implications in relation to design of developments in proximity to airfields has long been recognised and it is incorporated in the National Policy Statements, specifically in NPS EN1 Section 5.5. The implication is that this issue is not new and has been recognised for many years.</p> <p>Specifically, Para 5.5.41 makes reference to the need to not impact on bird strike probability by observing a 13 km (8 mile) exclusion zone around notified airfields. The requirement applies to all designated civil airfields, of which Blackpool Airport is one, and military airfields or ranges, which would include Warton Aerodrome. Throughout the Examination, there have been questions raised in the documentation by a range of interested parties to which unsatisfactory responses have been presented at the various deadlines, resulting in more comments. The responses from the Applicants have only served to generate further comments and queries, from the Examiners and Interested Parties and especially BAE Systems and the Defence Infrastructure Organisation.</p> <p>It is notable that in the latest version of the Environmental Statement, there is detail of the relevant sections of the NPS provided in Table 11.1 - Summary of the NPS EN-1, NPS EN-3 and NPS EN-5 requirements relevant to this chapter, but this paragraph does not appear.</p> <p><b>d. Current "Technical" Arguments</b></p>	Please refer to the Applicants response in rows C1-007-18, C1-1007-19 and C1-007-20 of this submission.

Reference	IP submission	Applicants' response
	<p>Most of the argument presented in reference 3 relates to re-assessment of the bird strike probability numbers resulting from the proposed changes. With the benefit of hindsight and the apparent omissions, this would appear to be a very risky approach. Reliance is made on a sort of “Pseudo-Science” in an attempt to derive a method that would require considerable effort to confirm the assumptions are correct and remain correct, as opposed to adopting the more conservative but established safe approach as demanded by Para 5.5.41 which invokes the 13 km zone around airfields.</p> <p>The latter requires no further policing or maintenance to ensure success. It also avoids all the lengths that have been gone to in attempting to prove the plan is actually viable, with all the risk that attaches so such an approach.</p> <p>It does imply that the chosen route was never really viable and should not have been considered. Had the airfields, especially Warton Aerodrome, been recognised at the outset, then the BRAG rating that should have been applied, would have eliminated this chosen routing option from the outset.</p>	
C1-009-04	<p><b>4. Economic Impact Considerations Relating to Warton Aerodrome</b></p> <p>BAE Systems is a Defence Company of International Significance, especially in these times of International stress, and forms a major support to the UK National Defence and Armed Forces. It is a major employer, particularly in this local area, with many dependent SMS businesses across the North West of England and throughout the wider UK regions. There are close liaisons with Partner Companies and Defence Agencies, many of which are spread across Europe and NATO. This requires close liaison and working together to deliver the programmes. To facilitate these exchanges, the Company operates its own airline, Corporate Air Transport, with a fleet of smaller airliners. At the peak of activity on projects, such as Typhoon, this generated around 100,000 passengers per annum through Warton Aerodrome. This is not a trivial operation. The economy of this region is highly dependent on the ability of BAE Systems to operate its test flying of military aircraft. These aircraft, which are armed for every flight – if only for the crew escape system – operate in a manner that is less predictable than the civil traffic that also operates from Warton Aerodrome. They may be frequently involved in high energy manoeuvring tasks as part of the testing which may be down to the lowest permitted levels whether over sea or land, as appropriate. This is part of the normal routine of their testing and/or demonstration to UK MoD and the Armed Forces as well as potential world-wide Customers for the air vehicles.</p>	The Applicants note this response.
C1-009-05	<p><b>5. Conclusions</b></p> <p>The following conclusions are drawn</p> <ol style="list-style-type: none"> <li>1. The current proposed development, as defined by the DCO, fails to comply with the declared objective of provision of energy at least cost.</li> <li>2. The proposal does not support the objective of Growth and Regeneration – especially in this locality.</li> <li>3. The omission of the Airfields in the initial assessments, especially Warton Aerodrome, has resulted in issues relating to Bird Strike and consequent increase in Risk of Death by neglect of the relevant section of the NPS (EN1 Para 5.5.41).</li> <li>4. Consequently, the proposal increases the risk of adverse impact on critical National Infrastructure of both the BAE Systems Warton and Westinghouse/BNFL Springfields sites in their ongoing operations and future sustainability.</li> <li>5. An Obvious Material Alternative Solution, as yet not fully assessed, using the Hillhouse TEZ with new substations thereon and with the existing transmission line capability, eliminates all of these unacceptable technical issues at a single stroke, as it relies upon existing infrastructure outside the critical zones.</li> <li>6. This alternative offers a significant cost saving overall and the regeneration opportunity needed by Northwest Lancashire.</li> </ol> <p>Perhaps, given the state of current knowledge, a full reconsideration of the bigger picture now presented would be more appropriate?</p> <p>This is not about criticism. It is about correcting a systemic oversight risk before costs are locked in.</p> <p>I respectfully recommend that DESNZ:</p> <ol style="list-style-type: none"> <li>1. Conduct an up-to-date, comprehensive, and consistent assessment of the multiple proposed projects for the Fylde Coast, comparing a Hillhouse/Stanah2 connection—an existing Technical Enterprise Zone—with a Penwortham connection. This assessment should explicitly assess the total lifetime consumer costs.</li> <li>2. Defer or refuse the final DCO application until the outcomes of the assessment are completed.</li> <li>3. Expand the Blackpool North &amp; Fleetwood Gateway for Clean Energy (GfCE) partnership board with key stakeholders, such as Ofgem, DESNZ and NESO, to explore coordinated infrastructure and regulatory innovation.</li> <li>4. Recognise the Wyre peninsula and related programmes as suitable for examination in a Regulatory Innovation Sandbox framework, noting that Lancashire County, Wyre Borough and Fylde Borough Councils have completed a preliminary Green Book assessment of the option suggested, with a favourable initial conclusion.</li> <li>5. Appropriate</li> </ol>	In so far as these comments relate to the merits of the application, the Applicants consider that all matters have been addressed in the Applicants' Closing Statement (REP7-042) and in Section 1.3 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39) regarding bird strike, and the Applicants' responses to Natural England and BAE Systems/DIO contained therein. The Applicants would further reference their responses to paragraphs 10 to 22 along with responses to 32 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	IP submission	Applicants' response
	<p>processes can then be adapted and applied to minimize consumer costs, facilitate growth &amp; regeneration in a severely deprived area, and of course, advance Net Zero targets, with safe &amp; sustainable development.</p> <p>6. Benefits of the Proposed Approach</p> <p>Time is short. The financial exposure is material. The systemic risk is identifiable. The corrective opportunity is still available.</p> <p>This proposal is made in good faith and in the interests of consumers, growth, and delivery of Net Zero.</p>	

## 2.9 Gillian Fielding (C1-010)

**Table 2.9: C1-010 – Gillian Fielding Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-010-01	<p>4 BAE systems</p> <p>I don't feel the bird strike risk can be mitigated nobody knows how the birds will act when the land is being disrupted people living in the fylde do not want a serious incident we want assurances that if given the go ahead and a serious incident happens we can hold someone accountable and prosecuted we don't just want the usual words lessons learned.</p>	<p>Please refer to the response within row C1-005-07. The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>
C1-010-02	<p>47 public sector equality</p> <p>I'm not sure again how this can be mitigated for WGEC and it would be a big loss to the community if they had to close especially for the riders with special characteristics but how can the owners take the risk and stay open and operating under these conditions</p>	<p>Please refer to the response within row C1-008-01.</p>
C1-010-03	<p>This project should have been rendered void the moment Morgan pulled out how could it suddenly not be viable because they didn't get a CFD in the auction round this tells me all I need to know we were sold on the fact it was two projects with separate companies on one application cutting down on disruption and duration of this project and now none of the original players are involved and CIP only took over Morecambe wind farm after the EXA ended</p>	<p>The Applicants refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), and to TCE's response to paragraph 34 of the same.</p>
C1-010-04	<p>Also after the close of the EXA period they could suddenly produce over 100 photos of how the substations would look in the environment this is disgusting that affected people and the public have not been able to see these from the beginning or during the EXA process The applicants never proved that they could deliver this project and they had 6 months to show the EXA that it is worth moving forward and they made very little progress I still have no faith in this project and it should be rejected and efforts concentrated on projects that could possibly be delivered the people of the fylde and businesses have had enough uncertainty with this project we don't deserve anymore.</p>	<p>The Applicants provided visualisations of the proposed onshore substation throughout the examination process, as set out in Volume 3, Annex 10.3: Visual baseline technical report (REP6-052).</p> <p>The Applicants disagree that little progress has been made. Over the course of the six-month Examination period and beyond, the Applicants have engaged with stakeholders, responding to questions, submitting detailed technical documentation, and where appropriate, refined our proposals. Please also refer to the response within row C1-007-24 which addresses landscape and visual matters, and to Section 1.6 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39).</p> <p>The Applicants have responses to all submissions made as part of this examination. All documents, including the Applicants responses, can be found in the document library on the Planning Inspectorates website. The Applicants maintain that the project is viable and will enhance the UK's energy security while supporting the delivery of its Net Zero commitments.</p>

## 2.10 Debra Karen Jean Helme (C1-011)

**Table 2.10: C1-011 - Debra Karen Jean Helme Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-011	<p>I respond to the recent email and further information requests from the Inspectorate. The continuing inability to resolve the bird strike increased risk remains alarming. If the current status quo is altered by any increased risk, the transmission route is not feasible. The danger to life, from a possible aircraft being brought down, in our coastal towns, is too great. BAE are correct in not altering their stance on safety. As a local resident I am glad of it. However, the pressure being applied to BAE to provide information relating to bird strike (ie giving hard facts about bird strike probability) is at odds with the need to ensure safety as a priority.</p> <p>At the Inspectorate meetings, BAE have consistently stated that the risk is likely impossible to mitigate. This is because they are dealing with the variables of a large wild bird population. They are being asked for details that might better be available through a crystal ball on Blackpool promenade. The pressure to provide this 'guesstimate' remains risky to local people, who must live or die with the consequences. No amount of directives given to BAE Warton to give hard and fast information relating to bird strike does not change the facts and logic of this issue.</p> <p>The applicants chose a flawed route, using workers who were unfamiliar to the area and the specific issues of this coastline and industry. The bird strike problem is a legacy of this poor workmanship.</p> <p>To proceed with this cable route in the face of such a glaring public safety risk is irresponsible. Local people should not be the collateral damage in the Government's hell-bent drive to Net Zero (which has had enough poor publicity to expose it's largely ideological status).</p>	<p>Please refer to the response within row C1-005-07 of this submission regarding bird strike, which provides an update on the Applicants' detailed position regarding bird strike as was set out comprehensively in their Examination submissions and the Applicants' conclusion on this matter is presented in Section 6 of the Applicants' Closing Statement (REP7-042), as supplemented by Section 1.3 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39). The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>

## 2.11 David Barlow (C1-012)

**Table 2.11: C1-012 - David Barlow Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-012-01	<p>Please see my response to the SoS for the Morgan and Morecambe offshore wind farm. Interested party reference number The first point I would like to make is the lack of common ground between the applicants and BAE Systems regarding the Bird Strike risk assessment.</p> <p><b>Page 2 and 3 items 4-14.</b></p> <p>It is imperative to note that this risk cannot be fully mitigated no matter what mitigations are put in place, especially to satisfy the needs of what I would describe as a badly designed transmission route that has been designed around minimising cost and having not considered human health, community concerns and public safety. Freckleton has still not recovered or forgot the worst ever military disaster in the country's history, losing a whole generation of our children amongst the 61 killed and must not be expected to have to live in fear of a repeat of this tragedy. The mass migrating, the feeding grounds, the flight paths and the roosting grounds of these birds which includes thousands upon thousands of large wading birds has been known for hundreds of years, way before the Warton aerodrome was even thought about. With this prior knowledge the initial risk assessment and the monitoring of these birds made the initial risk assessment fairly straight forward for BAe Systems. Attempts to create a new risk assessment would be impossible in ascertaining the way these birds will react to this application.</p> <p>This is emphasised in the International Bird Strike Committee's (IBSC25/WP-OS3 by Dr J.R. Allan) protocol for Bird Strike Risk Assessment at Airports in which it states "military airfields use an 8-statute-mile radius from the centre point of runways for statutory safeguarding against developments that might attract birds".</p> <p>[REDACTED],</p> <p>"It is probably safest to avoid attempting to assign probabilities to levels of damage and simply to assume that, in general, slower aircraft are less likely to sustain damage than faster moving ones (military jet fighters operating at low level are probably at the greatest risk from bird strike), that turboprop engines are less vulnerable than jets, and that large flocks of large birds are more likely to cause serious damage. 3.3.3 Risks versus hazards Once a risk has been deemed unacceptable, some evaluation of the value of the hazard needs to be made in order to inform the risk management</p>	<p>Please refer to the response within row C1-005-07 of this submission regarding bird strike, which provides an update on the Applicants' detailed position regarding bird strike as was set out comprehensively in their Examination submissions and the Applicants' conclusion on this matter is presented in Section 6 of the Applicants' Closing Statement (REP7-042), as supplemented by Section 1.3 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39). The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>

Reference	IP submission	Applicants' response
	<p>process that follows. For example, if an airport is constructed in the middle of an internationally important wetland the conservation value of the bird life present there may be judged to be so high that any management action to reduce what could be a severe hazard to aircraft is deemed unacceptable.”</p> <p>The Fylde simply cannot accept this risk and the phrase to mitigate for a “REDUCED RISK” to a bird strike should never be considered. When a military aerodrome is surrounded by urbanisation there has to be absolutely no increased risk whatsoever. You can only introduce new infrastructure that does not put the community’s safety into jeopardy otherwise to destroy the community destroys the concept. One of my peers who has knowledge second to none and has studied these birds for the last 45 years, worked at BAe Systems on this very issue, and has said that the way these birds would react to the disturbance would be impossible to ascertain before the project has been completed. The flight paths, feeding grounds and roosting grounds would undoubtedly be greatly affected. A risk assessment could only be carried out post project completion which is unacceptable. The 13km exclusion zone is there for a reason and ultimately this would then require BAe Systems to close down until the new risk has been assessed as not having created an increased risk. Consideration has also got to given to the latest BAe Systems recent contract to supply 20 Typhoon Jets to Turkey by 2030 which is going to entail numerous test flights in and around the same time as the Applicants projected timescales. Unmitigated bride strike issues may well render this contract unachievable. There is also another consideration now which is also in dispute with BAe Systems and the Applicants, concerning our national security, the fact the wind turbines are affecting BAe Systems radar systems, this again is another potential risk you would be expecting our community to absorb.</p> <p>I repeat, destroy the community destroy the concept. For significant infrastructure projects of this magnitude, it should be imperative that you have to take the community with you and look at a different less devastating route that this CAN take, you cannot just accept the cheapest route for the benefit and profiteering of M&amp;M.</p>	
C1-012-02	<p><b>Page 5 item 24. Regarding the concerns in relation to the substations visual screening and the adverse impacts of the proposed substations.</b></p> <p>My thoughts are that the sheer magnitude of these substations on our last piece of greenbelt in the village, render the possibility of screening impossible. Their idea to screen by planting trees is wholly unacceptable considering the timescale for these trees to grow to a size that could provide or alleviate the views to an acceptable level and certainly not in my lifetime. During the consultation period there was no acceptable photographic evidence provided for the community to scrutinise. The only artist impressions of the substations, about 109 pictures have been submitted to the PI as late as the 28th January 2026, this being after the end of the examination period and years after the initial public consultation. This information should surely have been provided at the initial consultation and the only conclusion you can come to is that the consultation was seriously flawed. Another seriously flawed example is that as my family is the nearest receptor to the Morecambe substation, out of the 109 photos and artist impressions not a single photo has been taken from the grounds of my property to highlight what it is going to look like for me, my family and all of the other lower lane receptors. This begs the question, why this set of photographs does not show views from lower lane, which happens to be right next to the substations and is providing the route to the main entrance? M&amp;M have dodged this question on numerous occasions, with their only excuse stating that “they could not take photos from everywhere due to timescale”, even though I pointed out to them they had to drive down lower lane in order to get to some of the other spots they actually had taken photos from. They are simply hiding the truth from the receptors. I live [REDACTED] across from the Morecambe substation and still have no idea what it is going to look like. That cannot be right!</p> <p>The light, air and noise pollution from these substations is wholly unacceptable to all receptors living on lower lane and the nearby vicinity. The air pollution will have a massive effect on my family, the property and indeed myself and my family will be permanently covered in dust and having to breath it all in. The article 8 of the human rights act 1998 relative to my family have been given zero consideration from the applicants. I have been offered no empathy or compensation from the applicants with regards to the situation they are forcing on me and they have shown no consideration for the mental health and stress their application has caused. I have been in the construction industry for [REDACTED] years and know exactly what is coming down the line from the millions of tons of aggregate being delivered to site right opposite my home.</p> <p>Which leads on to the next issue.</p>	The Applicants note this response. Please refer to the response within row C1-007-24 which addresses landscape matters.
C1-012-03	<b>Page 7.8. relating to the funding for CA and Blight payments of Morecambe offshore wind farm ltd.</b>	The Applicants refer Mr Barlow to section 1.15 of the Applicants response to the SoS Request for Information (C1-029.39) regarding funding. The

Reference	IP submission	Applicants' response
	This is a very disturbing issue that would affect myself and my family. Should approval be granted we are submitting substantial claims of 30fold the estimated total of potential blight payments put forward by the applicants, this will dwarf the £100k per substation estimate in the Applicants costings, and that is just one of the many receptors who find themselves in a similar situation. We require certainty that funds will be made available to satisfy this demand and that CIP have agreed that they will absorb all future claims. It goes without saying that claims cannot be initiated until the final decision on approval has been decided.	Applicants also refer to their response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-012-04	<b>Page 9 item 47 the Wrea Green Equitation Centre.</b> My thoughts are that the equality act has not been addressed when considering the potential closure of Wrea Green Equitation Centre. WGEC is a home to many disadvantaged children and up to 5000 horse riding lessons per year for the disadvantaged in our community. I have lived around and owned horses for many years, these are flight animals and it is inconceivable that they can be housed anywhere near to this proposed development. WGEC will have no option other than to go out of business.	Please refer to the response within row C1-008-01. The Applicants refer Mr Barlow to the Public Sector Equality Duty Statement, which was updated and submitted at Deadline 6 (REP6-132). The Applicants understand the concerns raised and are confident that suitable measures can be put in place to ensure the Centre's activities can continue alongside construction.
C1-012-05	<b>Comments on item 30 page 6. Fares Farm.</b> Having been a neighbour of Fares farm for many years and have had known the family personally for [REDACTED] years, I find it inconceivable that a generational farm, that is recognised throughout the whole country for its expertise, has been put in this situation. They are the backbone of not just the local community but the county's essential dependency on dairy produce. Their farmland has been given little or no consideration when selecting a site location. Other options were available to the applicants and this is emphasised by the Mooir Vannin design. Fares farm should be thanked, appreciated and fully supported by the government to continue serving us with their dairy farm, just as they are now within the Fylde Community. As the 13th of April is the deadline date for submissions to the many outstanding issues you have with numerous stakeholders and interested parties being so soon before the decision date, I find myself bewildered as to how all these issues could be addressed in time, responded to verbally and actually actioned upon to bring to a satisfactory conclusion. On the issue of items that have supposedly been addressed I would like to submit that I am not happy with the amount of non-disclosure agreements and the fact that objections that initially raised grave safety concerns, i.e. the Sabic TPEP have now withdrawn their objections without explaining the reasons behind them to the Fylde communities. The destruction this application is about to unleash on Fylde communities is too big a price to pay for what is now less than 25% of the original generation assets and the alternative route to Stanah must surely now become the default location. In summary, the design to get from the generation assets to Penwortham must be recognised as a BAD design based purely on cost with a total disregard to human health and human rights and the many concerns within the Fylde communities. It is doomed to fail and has to be revisited and redesigned around putting the communities first regardless of the extra cost. The Treasury's green book guidance seems to have been totally ignored by the applicants, should they have attempted to implement it, then I believe the transmission assets design would have failed at stage 1.	Please refer to C1-019 for the Applicants response to the Fares .  The Applicants refer Mr Barlow to SABIC UK Petrochemicals Limited and SABIC Petrochemicals BV removal of objection letter submitted at Deadline 7 (REP7-074). The Applicants and SABIC have agreed protective provisions, which was included in the Applicant's draft DCO submitted at Deadline 6 (REP6-013).  With regards to the alternative route to Stanah, please refer to row C1-005-09 of this submission.
C1-012-06	<b>Destroy the Community Destroy the Concept.</b> As a foot note may I suggest that an acknowledgement of my concerns would be greatly appreciated as to date it appears the Applicants have simply been ignoring them in a manner that gives the impression they have already been granted approval. Kind regards David Barlow.	The Applicants disagree that concerns raised have been ignored. Over the course of the six-month Examination period and beyond, the Applicants have engaged with stakeholders, responding to questions, submitting detailed technical documentation, and where appropriate, refined our proposals. The Applicants have responses to all submissions made as part of this examination. All documents, including the Applicants responses, can be found in the document library on the Planning Inspectorates website. The Applicants maintain that the project is viable and will enhance the UK's energy security while supporting the delivery of its Net Zero commitments.

## 2.12 Jackie Myerscough on behalf of Jean and Harry Kirkham (C1-013)

Table 2.12: C1-013 - Jackie Myerscough on behalf of Jean and Harry Kirkham Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-013	Despite meeting with the representatives of the above project on every opportunity and Hearing on 7th October 2025 , we only have a verbal agreement that the relevant company will not require the gate at the southern most entry of which impinges on access to our home.	The Applicants have engaged with representatives of Jean and Harry Kirkham who continue to participate in active and productive negotiations on the required land rights for the project. The last meeting was held on the 11

Reference	IP submission	Applicants' response
	<p>It is suggested that the construction access could be moved some meters north of this ( it is only a double gate wide). This has been agreed by our family who own the adjacent land through which the cable line is planned. We as a family have also offered an alternative Operational Access at the opposite end of their field. A written agreement to this plan would have alleviated our concerns. This is to be added in to any Heads of Terms which will include the whole family. Heads of Terms are not finalised with withdrawal of Morgan from the joint project.</p> <p>Included Map 1 and 2 highlighting area and issue Representation Document Notes from Hearing on Tuesday 7th October 2025</p> <p>Trusting this information is helpful Kind Regards Jackie Myerscough On behalf of Jean and Harry Kirkham</p>	<p>June 2026. In relation to the operational access, the Applicants are awaiting on feedback from Jean and Harry Kirkham's agent on the commercial terms offered. The Applicants would like to assure Jean and Harry Kirkham that they remain committed to the proposal for altering the operational access.</p>

### 2.13 Lancashire County Council (C1-014)

**Table 2.13: C1-014 - Lancashire County Council Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-014	26	<p>Thank you for your request for information from the county council dated 12th March 2026 regarding the above application.</p> <p>In relation to paragraph 26 Flooding I can confirm that the Applicants and Lancashire County Council have reached agreement on Protective Provisions being included in the draft DCO (in the form submitted during examination at Deadline 6 [REP6-013, Schedule 10 Part 10]) subject to an agreed proposed Amendment to Article 7 of the draft Development Consent Order (shown in the Schedule of Changes submitted with this response) relating to a technical modification of Section 64 of the Land Drainage Act 1991. This change to Article 7 is the insertion of a new sub-paragraph (3) as follows:</p> <p>(3) Section 64 of the Land Drainage Act 1991 is modified so as to read for the purposes of this Order only as if the following were inserted at the end of subparagraph (1)(a)—“or, as the case may be under the Morgan Offshore Wind Project and Morecambe Offshore Windfarm: Transmission Assets Order 202[•]”.</p> <p>If you require any further information or clarification, please do not hesitate to contact me.</p> <p>Yours sincerely Lancashire County Council</p>	<p>The Applicants note this response.</p>

### 2.14 Walker Morris LLP on behalf of Fylde Borough Council (C1-015)

**Table 2.14: C1-015 - Fylde Borough Council Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-015-01		<p>Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Consent Order Our Client: Fylde Borough Council Applicants: Morgan Offshore Windfarm Limited and Morecambe Offshore Windfarm Limited</p> <p>1. Introduction 1.1. We write on behalf of Fylde Borough Council ('the Council') who is the host Local Planning Authority for the Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Consent Order ('the DCO'). 1.2. These representations are directed to the Secretary of State in response to the Secretary of State's request for information dated 12 March 2026 ('Request for Information') and should be read in addition to the Council's representations dated 27 January 2026 provided at Annex 1 ('the January Representations'). 1.3. The Council continues to have due regard to the Government's advice to Local Authorities as to their role in the Nationally Significant Infrastructure Project process and notes that during the Recommendation and</p>	<p>The Applicants consider that Fylde Borough Council's (FBC's) representations do not raise any matters which would weigh against the grant of development consent. The Applicants have engaged extensively with FBC throughout the Examination as reflected in the Statement of Common Ground (REP7-028) and such engagement has continued throughout the post-Examination period, and multiple rounds of correspondence. Where matters remain in dispute, the Applicants submit that the draft DCO (REP6-013) as proposed contains adequate and proportionate provisions to secure necessary mitigation and to protect the interests of the Council and the local community.</p>

Reference	SoS point	IP submission	Applicants' response
		<p>Decision stage, its role is to respond as necessary to any consultations and requests for information issued by the Secretary of State.</p> <p>1.4. The Council considers it necessary and appropriate to state that these representations are made without prejudice to other ongoing endeavours relating to matters falling outside of the defined scope of the Request for Information. Specifically, the Council along with other Interested Parties continue to raise concerns relating to the lack of consideration of an alternative route and are preparing a Green Book appraisal. In this regard, the Council continues to be proactive in assisting the Government including the Secretary of State with understanding the justification for and the potential impacts arising from decisions which have already been made and the likely impacts of those yet to be made.</p>	<p>In relation to an alternative route the Applicants' site selection exercise was robust and comprehensive, and a one-project-only scenario was always assessed and planned for, as set out in the Applicants' Decision Stage Update Letter to the Secretary of State (S_SoSQ_1) and in Section 2.2 of the Applicants' Closing Statement (REP7-042). The Applicant's further refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), and specifically the section headed 'Co-ordination and Good Design', which sets out why the site selection conclusions would remain robust for Morecambe proceeding alone.</p>
		<p>1.5. These representations support and uphold the January Representations. The Applicants have failed to meaningfully engage with the Council in respect of the matters raised in the January Representations and therefore the Council's position remains unchanged. The Applicants provided a brief update as to its position on the outstanding matters only on 8 April 2026 which failed to progress discussions in a meaningful way. The Applicants correspondence of 8 April 2026:</p> <p>1.5.1. Confirmed that the Applicants do not agree to any mechanism in the draft DCO which restricts consent for the transfer of the benefit of the DCO until a completed deed of covenant by the transferee or lessee in favour of the council is completed and a deed of indemnity is provided to indemnify the Council in respect of the relevant s106 agreements. The Applicants did not offer any further explanation or evidence for this position.</p> <p>1.5.2. Offered to include an additional clause in the draft s106 for Blackpool Road Recreation Ground ('BRRG s106') to restrict development by any transferee pursuant to the Order until the transferee has entered into the deed of covenant. This clause would be used instead of our proposed wording in the draft DCO. This is not an adequate solution because it fails to address the Council's enforceability concerns and the reasons why the Council require security in the Order. Our proposed wording for the DCO is necessary because the Applicants do not own the DCO development land and therefore the s106 obligations are not directly binding / enforceable upon them.</p> <p>1.5.3. Confirmed that the Applicants do not agree to any other s106 obligations aside from those to provide for mitigation to St Annes Football Club at Blackpool Road Recreation Ground. The Applicants' comments reiterate their position and previous correspondence rather than providing evidence and justifications for their position.</p> <p>1.5.4. Agreed to entering into a deed of indemnity to indemnify the performance of the obligations in the Section 106 Agreement. The Council does however still require the wording in the draft DCO to ensure that the indemnity is entered into.</p> <p>1.6. These representations address the following as requested in the Request for Information:</p> <p>1.6.1. Paragraph 3: Any comments to the Applicants' update documents to the Secretary of State dated 30th January 2026 [PID-001] and 12 February 2026 [PID-002].</p> <p>1.6.2. Paragraph 44: An update on behalf of the Council on the position for:</p> <p>1.6.2.1. the draft BRRG s106</p> <p>1.6.2.2. the draft DCO wording which the Council proposed in its submitted January Representations</p> <p>1.6.2.3. The draft deed of indemnity which the Council proposed in its submitted January Representations.</p> <p>1.7. The Council is extremely concerned that the Applicants have in their updates to the Secretary of State, confirmed the decision of Morgan Offshore Wind Limited ('Morgan') to withdraw from the Morgan Offshore Wind Project. The updates state that Morgan Offshore Wind Project continues to be regarded as a viable and active project, subject to being delivered by a new promoter. However, no new promoter has yet to come forward.</p> <p>1.8. In view of this and because the Morgan Offshore Wind Project will (where it can) be delivered with a successive promoter, it is essential that the Council can directly enforce all mitigation measures against promoters and their successors. The Council's requests made under the January Representations are crucial, particularly:</p> <p>1.8.1. Clarification of the development pursuant to the DCO, including timeframes and funding, and for protections to be put in place for the promoter to demonstrate the scheme is deliverable and there is sufficient funding to meet all the compensation and mitigation measures.</p>	<p>Since January, the Applicants have continued to meet with FBC on a fortnightly basis (depending on availability and taking into account changes in personnel at the Council) to discuss the project. Additionally, drafting of the S106 for the Blackpool Road Recreation Ground has continued.</p> <p><b>Updates relating to Morgan</b></p> <p>The latest position regarding the updates to Morgan are set out in paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p> <p><b>Updates relation to Section 106 (s106) Agreement</b></p> <p>Both the Applicants and FBC agree in principle that a Section 106 agreement is required to secure mitigation for temporary construction impacts at Blackpool Road Recreation Ground ("BRRG"). An advanced draft BRRG s106 agreement is in circulation and negotiations are ongoing. The Applicants would further refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).</p> <p><b>Updates relating to DCO drafting</b></p> <p>The Applicants' full position on this point was set out in their Response to the Secretary of State's Letter (C1.029.39) in paragraphs 1.18.2.3 to 1.18.2.5. Furthermore, the Applicants have agreed to enter into a deed of indemnity in favour of FBC in order to indemnify the performance of the obligations in the s106 agreement. A draft deed of indemnity was shared with the Council on 20<sup>th</sup> May 2026, and the Applicants look forward to receiving any comments which the Council has on this draft.</p> <p>FBC's characterisation that the Applicants have provided "no meaningful evidence" for their position is not accepted. The Applicants have provided a detailed and reasoned response, supported by legal analysis and precedent, as to why the proposed amendment to Article 6 is unnecessary, as set out in correspondence dated 19 December 2025 and 8 April 2026 and in the Applicants' Response to the Secretary of State's Letter (C1.029.39, paragraphs 1.18.2.3 to 1.18.2.5).</p> <p><b>Sequential Delivery Concerns</b></p> <p>The Applicants acknowledge that sequential delivery is now a more likely scenario following the Morgan JV's decision (PID-002), however the potential for sequential delivery had always been accounted for and appropriate</p>

Reference	SoS point	IP submission	Applicants' response
		<p>1.8.2.The Secretary of State to ensure (including by provisions secured in the DCO) that no relevant part of the development can be carried out and no compulsory acquisition powers exercised unless and until it can be demonstrated that the development is deliverable and funding is in place for the relevant part of the development to avoid environmental harm and harm to affected owners.</p> <p>1.8.3.Planning obligations, including the package of s106 obligations referred to in the January Representations as 'the Requested s106 Obligations' are to be secured using a s106 agreement and for the DCO to include a mechanism to bind the Applicants, or promoters for the DCO development to any s106 obligation.</p> <p>1.8.4.The Applicants enter into a deed of indemnity in favour of the Council to give the Council the security of being able to enforce any s106 obligations against the Applicants or successors and for a mechanism to be inserted into the draft deed of indemnity with any s106 agreement.</p> <p>1.9. Proceeding with a new promotor for Morgan means that sequential development is likely. Sequential development creates a longer construction period for the DCO development as a whole and increases the risks of extended disturbance, diminished effectiveness of mitigation measures, and substantial adverse impacts on the community, local environment, and recreational facilities.</p> <p>1.10. As previously stated in its January Representations and in correspondence with the Applicants, the Council considers there is insufficient security on the face of the current draft DCO to enforce s106 obligations against successive promotors. If the Morgan Offshore Wind Project proceeds, it will clearly be with a successive promotor and therefore sufficient enforcement mechanisms on the ensure the Council can enforce against any successors must be in place. The Council cannot risk fettering its discretion of enforcing s106 obligations and cannot be forced to limit how it enforces s106 obligations in any way.</p> <p>1.11. To date, the Applicants have not provided any meaningful evidence as to why it refuses the Council's proposed DCO drafting to secure enforcement of s106 obligations on promotors and any successors. In view of the Applicants' failure to make any meaningful progress in negotiations with the Council on these points, we expressly request that the Secretary of State considers the drafting proposed (at paragraph 3.3.2 of these representations) as part of its decision making. Our draft wording seeks to, on the face of the Order:</p> <p>1.11.1. bind Applicants or promotors for the DCO development to any outstanding s106 obligation and</p> <p>1.11.2. provide the Council with a deed of indemnity to indemnify the Council and Lytham Town Trust (the landowner) in respect of the s106 obligations.</p> <p>We remain open to using alternative wording to achieve security for the Council to enforce s106 obligations under the DCO on promotors or successors. We have considered and proposed using the wording in the Sizewell C (Nuclear Generating Station) Order 2022 as a suitable alternative mechanism.</p> <p>1.12. We further direct the Secretary of State to request an update from the Applicants for justification in refusing to engage on the draft wording that goes further than the correspondence which we only received on 8 April.</p>	<p>mitigation has been developed on this basis. The Applicants refer to Section 2.4 of their Closing Statement (REP7-042).</p>
C1-015-02	3	<p>2. Paragraph 3 Request for Information</p> <p>2.1. Applicants' update – end of Examining Authority recommendation period, 30 January 2026</p> <p>2.1.1.Morgan's decision not to proceed with the Agreement for Lease and the Crown Estate's intention for the Morgan Offshore Wind Project to proceed with a new developer is of significant concern to the Council for the following reasons:</p> <p>2.1.1.1. The Applicants do not own the DCO development land. Therefore, delivering the Morgan Offshore Wind Project with another developer / promotor means that it is crucial the DCO contains a mechanism to ensure that the BRRG s106 is entered into by the new promotor and the Requested s106 Obligations are secured by means of a s106 agreement with a mechanism in the DCO for successive promotors to be bound to the s106. Our suggested wording for the DCO is set out at paragraph 3.3.2 below.</p> <p>2.1.1.2. Paragraph 3 of the Applicants' update confirms that the compulsory acquisition and temporary powers sought by the draft Order are delineated between Project A (Morgan Offshore Windfarm Project) and Project B (Morecambe Offshore Wind Project) and that Article 33 of the draft Order provides a separate obligation on each party so that it may not exercise these powers without approval from the Secretary of State who must first be satisfied that the funding for its liabilities in in place. However, the Council requires the security that no relevant part of the development can be carried out and no compulsory acquisition powers exercised unless and until it can be demonstrated that the development is deliverable and funding is</p>	<p>Please refer to the response within row C1-015-01 for the Applicants' overarching response to FBC's representations. Regarding the wider suite of 'Requested s106 Obligations', the Applicants refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).</p>

Reference	SoS point	IP submission	Applicants' response
		<p>in place for the relevant part of the development to avoid environmental harm and harm to affected owners.</p> <p>2.1.1.3. There is a strong probability that the DCO development will be developed sequentially and with a gap between construction periods. This is the worst-case scenario for mitigation because the gap in construction period would delay and / or decrease its effectiveness. Public interest impacts and disturbance, such as to ecology, landscape and visual, noise and vibration, biodiversity etc would be over a longer duration and therefore of greater effect. The start / stop nature of construction would result in material harm to all assessed impacts.</p> <p>2.1.1.4. A delay in the construction of the Morgan project due to sequential delivery would result in inadequate landscape and visual mitigation of the proposed substations, as by disturbing or removing the planting schemes implemented for the first scheme, in order to construct the second, it would inevitably set back the effectiveness of any such screening or enclosure, resulting in prolonged "short term" effects and compromising long term benefits. The Council has already set out in all previous representations that vegetation and landform or earthworks which can provide visual enclosure and a level of screening to the substations would be less effective where there are lengthy gaps in the construction of the projects. This has the potential for further harm to the Green Belt.</p> <p>2.1.1.5. Sequential delivery would result in maximum displacement and disturbance for St Annes Football Club.</p> <p>2.2. Applicants' February update letter to the Secretary of State (12 February 2026)</p> <p>2.2.1. Our update on the draft BBRG s106 in response to the position set out by the Applicants is at paragraph 3 below.</p> <p>2.2.2. With regards to the Requested s106 Obligations, the Council set out the additional obligations it required for there to be sufficient mitigation with detailed justification as to why the Requested s106 Obligations are considered lawful, proportionate and necessary mitigation in its January Representations. We refer the Secretary of State to such made representations, particularly paragraphs 4 and 5 which sets out the Council's position with regards to the obligations required, Government Guidance and planning policy and compliance with Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).</p> <p>2.2.2.1. Our position on these Requested s106 Obligations is maintained. It is still the Council's position that it does not support the DCO development without the Requested s106 Obligations. It considers these to be necessary mitigation to make the development acceptable in planning terms and a material consideration in decision making. We respectfully invite the Secretary of State to give significant weight to the need for the Requested s106 Obligations.</p> <p>2.2.2.2. The Council upholds its January Representations that securing the Requested s106 Obligations as obligations under s106 of the Town and Country Planning Act 1990 is the only suitable mechanism to secure the Council's requested measures with the certainty and enforceability required. The Requested s106 Obligations can either be a separate agreement or obligations included within the existing draft BRRG s106.</p> <p>2.2.2.3. To date, there has been no engagement by the Applicants to negotiate the Requested s106 Obligations. The Applicants are simply of the position that none of these mitigation measures are required. Failure to engage on the Requested s106 Obligations risks inadequate mitigation for the DCO development, without which the DCO development would not be acceptable in planning terms and would not meet the relevant tests.</p> <p>2.2.2.4. Our January Representations set out:</p> <p>2.2.2.4.1. The Council does not support the DCO development without the Requested s106 Obligations and these are a material consideration in decision making.</p> <p>2.2.2.4.2. The Requested s106 Obligations constitute lawful, proportionate and necessary mitigation without which the DCO development would give rise to inadequately mitigated impacts and delivery risk.</p> <p>2.2.2.4.3. Recent DCO decisions (The Lower Thames Crossing DCO, Sizewell C DCO and Gatwick Airport Northern Runway) demonstrate a consistent approach that funding, monitoring and governance are properly secured through binding planning obligations rather than DCO requirements.</p> <p>Our position remains the unchanged; these mitigation measures are essential to support the DCO development, and a section 106 agreement is considered the only suitable mechanism to secure the Council's requested measures with the certainty and enforceability required.</p>	

Reference	SoS point	IP submission	Applicants' response
		2.2.3.The Request for Information allows for further updates from other Interested Parties, some of which relate to the Requested sS106 Obligations. The Council therefore submits the following against questions in the Request for Information for the Secretary of State's consideration:	
C1-015-03	17	2.2.3.1. Questions 17 Sandbank Waves We note that the Request for Information considers the Outer Dowsing Offshore Windfarm which resolved uncertainties in relation to sandwave recovery with a commitment to longer term monitoring of sandbanks. In view of this position, the Secretary of State asks the Applicants to also consider updating their position to secure further surveys of sandwave recovery if the initial post construction survey does not indicate full recovery. The Requested S106 Obligations require a financial contribution for further monitoring and water quality assessment to enable adequate monitoring of the sandbanks where there is not a full recovery. To date, this contribution has been refused.	The frequency of surveys used to assess sandwave recovery will be finalised in the monitoring plan, as secured within condition 18(1)(d) of the Deemed Marine Licences under Schedule 14 and 15 of the DCO (REP6-013).  The Applicants refer to The Applicants refer to Section 1.5.2 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).  With regard to the 'Requested S106 Obligations', the Applicants refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).
C1-015-04	23	2.2.3.2. Questions 23 Fairhaven Marshes SSSI The Secretary of State notes the outstanding disagreement between the Applicants and Natural England regarding mitigation measures for impacts to marine physical processes. The Council has also made representations that the proposed mitigation for the marine physical processes is insufficient, most recently in Section 2.4 of REP7-046. In particular, current mitigation does not protect Fairhaven Salt Marshes from human intrusion, disturbance and long-term displacement of sediment. The Requested s106 Obligations require s106 contributions to secure appropriate fencing and signage as well as specialist monitoring by the Coastal Management Team. The long-term displacement of sediment has a detrimental impact on the habitats of intertidal bird species including knot, sanderling, dunlin, oystercatcher, curlew. The Applicants' current mitigation measures do not provide suitable alternative habitat. The Council therefore requires appropriate monitoring of the habitats and effected species and requests funds for this.	The Applicants' position on marine physical processes and the mitigation measures for the nearshore and intertidal area is set out in Section 1.5 of the Applicants' Response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39). The Applicants also refer to their response to paragraphs 23 to 29 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). The Applicants have also responded to Natural England's submissions on these matters in their response to Natural England's representations (C1-016) in Section 2 of this document. With regards to the 'Requested S106 Obligations', the Applicants refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).
C1-015-05	28	2.2.3.3. Question 28 – Other Onshore Ecology The Requested s106 Obligations requested funds for dedicated, developmentfunded staffing and specialist consultancy support to enable the ecological mitigation identified in the Environmental Statement to be secured.  2.2.3.4. Question 29 Lytham St Annes Dunes SSSI The Council also has concerns regarding indirect significant impacts on the Lytham St Annes Dunes SSSI from cable installation, most recently in Section 2.4 of REP7-046. The Council has requested a financial contribution as part of the Requested s106 Obligations to ensure post-construction management, monitoring and habitat-focused intervention necessary to offset those impacts particularly for the Clifton North Road Dunes system. To date, this has been refused by the Applicants.	The Applicants' position on onshore ecology matters, including the Lytham St Annes Dunes SSSI, is set out in Section 1.10 of the Applicants' Response to Secretary of State Letter dated 12 March dated 12 March 2026 (C1-029.39) and in Section 5.7 of the Applicants' Closing Statement (REP7-042). With regards to the 'Requested S106 Obligations', the Applicants refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).
C1-015-06	44	3. Paragraph 44 Request for Information 3.1. Blackpool Road Recreation Ground S106 Agreement 3.1.1.The Applicants are engaging on a draft s106 agreement to secure planning obligations in relation to land at Blackpool Road Recreation Ground (the BRRG s106) for which an advanced draft agreement is in circulation and negotiations are ongoing. The draft agreement was returned from Morecambe on 13 April 2026 and at the time of writing is with the Council for consideration. 3.1.2.The draft agreement is between (1) the Council, (2) Morecambe and (3) Lytham Town Trust given that Morecambe is likely to implement its project first or as a standalone project. Once agreed, it is intended that a second s106 agreement for Morgan will be entered into, and this will mirror the one agreed by Morecambe. 3.1.3.The draft BRRG S106 allows for concurrent and sequential delivery of the projects. 3.1.4. We have not reviewed the draft agreement as returned on 13 April 2026 in detail. However, from an initial review, the main outstanding points in dispute for the draft BRRG s106 relate to: 3.1.4.1. The amounts due for some of the financial contributions – the contributions are agreed in principle, but the parties are still negotiating on some of the amounts due, namely for the 'Subsidies Commuted Sum' and the 'Transport Cost Commuted Sum'	The Applicants refer to the response within row C1-015-01. With regards to the Requested s106 Obligations, the Applicants refer to Section 1.18 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).

Reference	SoS point	IP submission	Applicants' response
		<p>3.1.4.2. The method of calculation for the 'Football Pitches Replacement Sum' and the inclusion of additional operational costs once the pitches are laid out (e.g. remarking/ maintenance, goal movement or set up, stewarding or supervision, cleaning / litter additional wear and tear on the land.</p> <p>3.1.4.3. The timescale for unspent contributions to be returned to the Applicants.</p> <p>3.1.4.4. The provision of 'Temporary Replacement Pitches' on Council owned land in the first instance and timescales for delivery.</p> <p>3.1.4.5. The required standards for the restoration of the St Annes Football pitches and maintenance provisions post completion of the Morecambe / Morgan Recreation Ground Works.</p> <p>3.1.5. The Applicants have proposed the insertion of a clause in the BRRG s106 to restrict the development until the transferee enters into a deed of covenant in respect of the s106 obligations. This was proposed by the Applicants on 8 April 2026 and to be instead of the requested DCO mechanism (see paragraph 3.3 below). The Council however still requires its proposed wording in the DCO for the reasons set out above.</p> <p>3.1.6. The Council is the Local Planning Authority for the purpose of the draft BRRG s106. It is also acting on behalf of Lytham Town Trust Limited who are the landowner to negotiate the terms of the agreement. However, Lytham Town Trust will need to agree to the provisions and thereafter execute the final agreement. Once the Council and the Applicants have agreed the drafting of the BRRG s106, this will either need to be agreed by Lytham Town Trust, or by the Council under such circumstances where Lytham Town Trust consent to the Council acting on their behalf in this capacity.</p> <p>3.2. The Requested s106 Obligations</p> <p>3.2.1. The Council has requested the scope of the draft BRRG s106 is widened to incorporate the Requested s106 Obligations. This has been refused by the Applicants.</p>	
C1-015-07		<p>3.3. Draft DCO Wording</p> <p>3.3.1. The Council's January Representations in relation to its reasons for its required drafting are maintained.</p> <p>3.3.2. In summary, to bind the Applicants, or promoters for the DCO development including their successors to any s106 obligation, the following wording has been proposed to the Applicants to be included at Part 2, Paragraph 6 of the draft DCO which deals with transferring the benefit of the Order:</p> <p>6 (5)</p> <p>"The Secretary of State shall consult with Fylde Borough Council ('the Council') and shall not grant consent pursuant to paragraph (2) above unless the Secretary of State has confirmed in writing that the Secretary of State is satisfied that the following deeds have been entered into and will be legally binding immediately following the grant of consent—</p> <p>(a) a completed deed of covenant by the transferee or lessee in favour of the Council in which the transferee or lessee covenants to be responsible for the performance of all those obligations outstanding at the point of any transfer or grant as placed on the landowner and the undertaker under:</p> <p>(i) the planning obligation by deed of agreement under s106 of the Town and Country Planning Act 1990 relating to development land at Blackpool Road Recreation Ground, Lancashire and any other s106 obligation forming mitigation for Project A as may be reasonably requested by the Council, dated [ ] and entered into by (1) the Council, (2) Lytham Town Trust Limited and (3) Morgan Offshore Wind Limited; and/or</p> <p>(ii) the planning obligation by deed of agreement under s106 of the Town and Country Planning Act 1990 relating to development land at Blackpool Road Recreation Ground, Lancashire, and any other s106 obligation forming mitigation for Project B as may be reasonably requested by the Council, dated [ ] and entered into by (1) the Council, (2) Lytham Town Trust Limited and (3) Morecambe Offshore Windfarm Ltd; and</p> <p>(b) provide the Council with a deed of indemnity to indemnify the Council and Lytham Town Trust in respect of the relevant planning agreement(s) at paragraph 6(5)(a), to be substantially in the form of the deed dated [ ] and entered into by [ ]</p> <p>And the said deed of covenant and deed of indemnity shall be in a form which is to the reasonable satisfaction of the Council (which shall not be unreasonably withheld or delayed)"</p>	The Applicants note the Council's proposed DCO drafting and refer to the response within row C1-015-01.

Reference	SoS point	IP submission	Applicants' response
		<p>3.3.3.The wording at paragraph 3.3.2 is the Council's preferred approach and has been proposed in numerous and repeated correspondence to the Applicants including with a copy of the January Representations.</p> <p>3.3.4.The Council has also suggested alternative mechanisms such as using the wording which is included within the Sizewell C DCO to enforce the terms of a deed of obligation where any benefit of the Order is transferred. The Applicants have not engaged on either approach.</p> <p>3.3.5.The decision of Morgan to discontinue with the Morgan Offshore Wind Project and not proceed with its Agreement for Lease with the Crown Estate emphasises the need for the DCO to secure binding planning obligations that run with the land.</p> <p>3.3.6.The Council's approach to secure sufficient enforcement of the BRRG s106 obligations is not unreasonable. The Council cannot fetter its discretion in enforcing s106 obligations. Its approach is entirely consistent with other large DCO schemes, including the Sizewell C DCO.</p> <p>3.3.7.To date, we have not had any response to our proposed DCO drafting nor any meaningful evidence from the Applicants to support their position. The Applicants have simply stated in correspondence to us that they do not agree that a mechanism to bind the Applicants, or promotors for the DCO development including their successors to any s106 obligation is necessary. The Applicants incorrectly consider a contractual obligation in the BRRG s106 which secures a deed of covenant to restrict development under the DCO to be sufficient because the s106 obligation will run with the land.</p> <p>3.3.8.The absence of the proposed wording in the DCO means the Council would not be able to enforce necessary s106 mitigation against a promotor or successive promotor and it risks fettering its discretion in enforcing s106 obligations. Should the Morgan Offshore Wind Project proceed, it will now be with a successive promotor. The Council's proposed enforcement mechanism is therefore entirely necessary, and we request the Secretary of State has regard to our proposed approach and wording as part of its decision making.</p> <p>3.3.9.Failure of the Applicants to engage on the appropriate wording in the DCO prevents the Council from securing and enforcing appropriate and necessary mitigation. The promotor does not own the development land and so there needs to be a mechanism to enforce the s106 obligations against promotors and successive promotors.</p>	
C1-015-08		<p>3.4. Draft deed of indemnity</p> <p>3.4.1.The Council can only enforce s106 obligations on the landowner or parties with a legal interest in the land. However, the DCO development land is not owned by the Applicants. The Council has therefore requested that the Applicants enter into a deed of indemnity against the s106 obligations in favour of the Council as long leaseholder of the Blackpool Road Recreation Ground land and its successors in title (if the Council wants to transfer its interest) and in favour of the landowner. This would give the Council the security of being able to enforce any s106 obligation against the Applicants or their successors. The Council has requested a mechanism be inserted into the draft DCO to secure a deed of indemnity with any s106 agreement (see wording proposed at paragraph 3.3.2). This mechanism is essential considering that Morgan is not proceeding with the Morgan Offshore Wind Project.</p> <p>3.4.2.The Council has had no response to its proposed wording in the DCO to secure the requested deed of indemnity from the Applicants.</p> <p>3.4.3.The Applicants have previously stated that they do not consider a deed of indemnity in favour of the Council necessary because the Council's leasehold interest is excluded from the draft s106 agreement and so the Council does not need to be indemnified against s106 obligations. It is not, however, the purpose of the deed of indemnity to indemnify the Council from liability as leaseholder for the obligations under the draft BRRG s106 (this has been carved out in the agreement). Instead, the Council seeks an indemnity so that it can directly enforce the s106 obligations on the promotor (or its successors) rather than enforcing against Lytham Town Trust who is the Parish Council and landowner.</p> <p>3.4.4.We understand the current draft deed of indemnity indemnifies Lytham Town Trust so that it is not liable for the s106 obligations as the landowner. The Council therefore requires a method to enforce against the promotor (including successors), given that the applicant / promotor does not own the s106 land. The Council received correspondence on 8 April 2026 to confirm that the Morecambe would be willing to enter into a deed of indemnity with the Council in which Morecambe will indemnify the performance of the</p>	The Applicants provided a draft Deed of Indemnity to the Council on 20 May 2026 and look forward to receiving any comments which the Council has on this draft.

Reference	SoS point	IP submission	Applicants' response
		<p>obligations in the BRRG s106. We will seek to promptly negotiate the deed of indemnity on appropriate terms. To date, no draft deed of indemnity has been received. The position in relation to a deed of indemnity for Morgan / the Morgan Offshore Wind Project is unconfirmed and is still required.</p> <p>3.4.5. For security of enforcement, the Council maintains its request for a requirement in the DCO, restricting development until the s106 agreement(s) and associated deed(s) of indemnity are entered into by the Applicants with the Council.</p> <p>3.4.6. Failure of the Applicants to engage on the draft deed of indemnity in favour of the Council prevents the Council from having an appropriate enforcement mechanism for the s106 obligations against the promoters and risks necessary mitigation being unable to be obtained.</p>	
C1-015-09		<p>4. Other representation made by the Council</p> <p>4.1. The Council also asks the Secretary of State to note the following against other questions set out in the Request for Information</p> <p>4.1.1. Question 24 – Landscape and Visuals The Council maintains its view that the proposed substations would be inappropriate development within the Green Belt and would severely compromise the intended functions of the designated Area of Separation to maintain open countryside between the settlements of Kirkham and Newton with Scales. The Council does not consider that the Applicants have assessed alternative sites in isolation or in combination and raise concerns regarding the effectiveness of the visual screening for the onshore substations where the delivery of the Morgan and Morecambe projects is subsequential (see paragraph 2.1.1.4 above).</p>	Please refer to the response within row C1-007-24.
C1-015-10	25	<p>4.1.2. Question 25 – Construction Hours The Council is concerned that the Applicants have not carried out adequate Equalities Assessments in relation to sensitive receptors with protected characteristics such as the Wrea Green Equitation Centre, Century Care Home and the residential development in and around Blackpool Road Playing Fields.</p>	The Applicants refer FBC to section 1.7 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39).
C1-015-11		<p>4.1.3. Question 27 – Biodiversity Net Gain The Council is supportive of the proposed amended wording for Requirement 26 (1) of Schedules 2A and 2B of the draft DCO, on the basis that the biodiversity benefit works may be part of and prerequisite to work which more broadly falls within 'onshore works'.</p>	The Applicants note this response.
C1-015-12	32	<p>4.1.4. Question 32 – Historic Environment The Council also request the Secretary of State has due consideration to its representations made on the historic environment, particularly to the Grade 1 Listed New Lea Hall, Grade II Listed Newton buildings and the non-heritage listed assets and burial ground at Lower Lane. These representations were most recently summarised in Section 1.4.3 of REP-028.</p>	The Applicants note identification of designated heritage sites, including those within 5km of the onshore substations, are presented in Volume 3, Chapter 5: Historic Environment of the Environmental Statement (APP-096). The mitigation measures and monitoring outlined in Volume 3, Chapter 5: Historic environment and the Commitments Register (REP-042) are appropriate and will ensure significant effects to heritage assets are avoided.
C1-015-13	33 and 34	<p>4.1.5. Questions 33 and 34 – Funding for Morgan The Council support the request for Funding Statements of Morgan and the provision of detailed information regarding its viability and the necessary funding to underpin the compulsory acquisition powers sought and any potential claims for blight.</p> <p>Given the absence of a confirmed successive promoter, the Council maintains its requested wording to be included in the DCO to ensure that no relevant part of the development can be carried out and no compulsory acquisition powers exercised unless and until it can be demonstrated that the development is deliverable and funding is in place for the relevant part of the Development to avoid environmental harm and harm to affected owners. See the Council's January Representations.</p>	The Applicants refer FBC to section 1.15 of their response to the Secretary of State's Letter dated 12 March 2026 (C1-029.39), and with regarding to funding the Applicants also refer to their response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-015-14		<p>5. Conclusions</p> <p>5.1. The decision of Morgan to discontinue with the Morgan Offshore Wind Project risks the obligations contained within the draft BRRG s106 being unenforceable on the successive promotor because the Applicants do not own the land. The following protections are therefore essential:</p> <p>5.1.1. Our requested mechanism to secure the BRRG s106 obligations is contained in the DCO so any successor to Morgan (and to Morecambe) is bound to obligations and the necessary mitigation is secured.</p> <p>5.1.2. The Requested s106 Obligations are to be secured using a s106 agreement and for the DCO to include a mechanism to bind the Applicants, or promoters for the DCO development to any s106 obligation. The Secretary of State cannot be satisfied that the DCO would deliver acceptable environmental, social, or landscape outcomes unless there is a robust mechanism to enforce the planning obligations.</p>	Please refer to C1-015-01 to C1-015-13 for the Applicants response.

Reference	SoS point	IP submission	Applicants' response
		<p>5.1.3. The Applicants enter into a deed of indemnity in favour of the Council to give the Council the security of being able to enforce any s106 obligations against the Applicants or successors and for a mechanism to be inserted into the draft deed of indemnity with any s106 agreement.</p> <p>5.1.4. The Secretary of State to ensure (including by provisions in the DCO) that no relevant part of the development can be carried out and no compulsory acquisition powers exercised unless and until it can be demonstrated that the development is deliverable and funding is in place for the relevant part of the development to avoid environmental harm and harm to affected owners.</p> <p>5.1.5. Clarification of the development pursuant to the DCO, including timeframes and funding, and for protections to be put in place for the promoter to demonstrate the scheme is deliverable and there is sufficient funding to meet all the compensation and mitigation measures.</p> <p>5.2. Failure of the Applicants to engage on the mechanisms required prevents the Council from securing and enforcing appropriate and necessary mitigation from the promoters or successive promoters. The Council considers there to be insufficient security for the enforcement of s106 obligations on the face of the current draft DCO and it cannot fetter its discretion in enforcing s106 obligations. It therefore requires its requested enforcement mechanism to be included in the draft Order.</p> <p>5.3. In light of its failure to make any real progress on negotiating the drafting for the DCO with the Applicants, we expressly request that the Secretary of State considers our proposed wording as part of its decision making together with our justification for its inclusion. We also direct the Secretary of State to request an update from the Applicants on this matter and for meaningful evidence to be provided for why the Applicants refuse to engage on our proposed wording. We will continue to seek proactive engagement with the Applicants on this matter and the other outstanding issues.</p> <p>5.4. The Council respectfully requests that the Secretary of State does not grant the DCO without ensuring that the planning obligations, DCO drafting and indemnity provisions outlined in these representations are secured.</p>	

## 2.15 Natural England (C1-016)

Table 2.15: C1-016 - Natural England Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-016-01		<p><b>Application by Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (“the Applicant”) for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets (“Project”)</b></p> <p>The following constitutes Natural England’s formal statutory response to the Secretary of State’s Request for Information (RFI) dated 12 March 2026. To inform this response Natural England has reviewed the following documents submitted into Examination by the Applicant at Deadlines 6 and 7:</p> <ul style="list-style-type: none"> <li>• [REP6-024] E2.3 Habitats Regulations Assessment Stage 2 Information to Support an Appropriate Assessment - Part Three – Special Protection Areas (SPA) and Ramsar Site assessments (Clean) - Rev F03</li> <li>• [REP7-034] S_D3_8 Outline Wildlife Hazard Management Plan (Clean) - Rev F04</li> <li>• [REP6-104] J20 Offshore In Principle Monitoring Plan (Tracked) - Rev F05</li> <li>• [REP6-151] S_D4_22 Outline Landfall Construction Method Statement (Clean) - Rev F03</li> <li>• [REP6-115] J6 Outline Ecological Management Plan (Clean) - Rev F06</li> <li>• [REP7-009] F2.1 Environmental Statement Volume 2, Chapter 1: Physical processes (Tracked) - Rev F03</li> <li>• [REP5-030] F2.1 Environmental Statement Volume 2, Chapter 1: Physical processes (Clean) - Rev F02</li> <li>• [REP7-021] J19 Outline offshore operations and maintenance plan (Tracked) - Rev F04</li> <li>• [REP7-031] S_D1_9 Stage 2 MCZ Assessment - Rev F04</li> </ul>	The Applicants note this response.

Reference	SoS point	IP submission	Applicants' response
		<ul style="list-style-type: none"> <li>[REP6-140] S_D3_6 Outline Hydrogeological Risk Assessment for Lytham St Anne's Sand Dunes (Clean) - Rev F03</li> </ul>	
C1-016-02	6	<p><b>Correspondence received from the Applicants since the close of the examination</b></p> <p>Since the closure of Examination Natural England has been engaging with the Applicant under our Discretionary Advice Service (DAS) to progress outstanding onshore ornithology matters. Through DAS we received an updated Outline Ecological Management Plan (OEMP) with additional updates since [REP6-115] and we provided comments to the Applicant on 11 March 2026 (provided in Annex 1 of this response letter). With the likelihood of the Applicant submitting an updated OEMP at RFI 1 deadline, we have summarised below our advice provided to the Applicant and our position on the potential alternative mitigation options we have had sight of.</p>	The Applicants have continued engagement with Natural England since the closure of Examination and would refer to the Applicants response to paragraphs 17 and 18 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14) which sets out the latest position. The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-016-03		<p><u>Alternative Temporary Mitigation Measures</u></p> <p>In January 2026 we provided DAS advice to the Applicant which outlined outstanding concerns relating to the alternative temporary mitigation measures. These were predominantly in relation to reinstatement of the land in the areas within the vicinity of Lytham Moss and Newton-with-Scales during the restricted months and the need for further detail to provide assurance that the works undertaken would not fundamentally alter the land in a way that would render these areas unsuitable for birds. aThese concerns regarding alternative mitigation for temporary impacts have now been addressed in the updated OEMP, Appendix H1, which we anticipate the Applicant to submit as requested. Appendix H outlines the three different scenarios and now includes additional detail for scenarios two and three. Natural England is content that the proposed reinstatement measures in the form of backfilling the onshore export cables up to subsoil level, removal of construction plant and equipment and removal of material storage are appropriate, should the alternative scenarios be implemented. We confirm that the additional information included in the updated OEMP reviewed through DAS provides sufficient detail on reinstatement of land to be confident that the areas will be suitable for birds to use during the winter months when the seasonal restriction will be in place. Therefore, Natural England confirms that subject to reviewing an updated OEMP submitted at RFI Deadline 1 as part of our statutory advice to the Secretary of State, we have no further comments on temporary mitigation measures. All outstanding issues related to alternative mitigation for temporary habitat loss during the construction phase are now likely resolved on the understanding that the alternative scenarios outlined by the Applicant are sufficient to rule out an Adverse Effect on Integrity (AEoI) for the Ribble and Alt Estuaries SPA/Ramsar. Natural England will confirm this once we have reviewed the submitted OEMP.</p>	Please refer to the response at row C1-016-02 of this submission.
C1-016-04		<p>Noting Question 5. Raised by the Secretary of State, we wish to highlight that Natural England is of the view that the alternative mitigation options (scenario 2 and scenario 3) represent a more appropriate use of the mitigation hierarchy, than the primary measure (scenario 1) , due to the measures being based on phasing/screening restrictions and screening which will directly avoid and minimise impacts. These interventions represent interventions at earlier stages of the mitigation hierarchy, and as such should normally have been considered first before proceeding to measures lower down the mitigation hierarchy (as raised in Natural England's Relevant Representations ([RR-1601], ref: H2, H32). The Applicant did proceed with off-site mitigation area proposals (scenario 1), which were eventually agreed by Natural England through the Examination process. We do consider that there are grounds for considering these options preferable to off-site mitigation measures, given there is inevitably some uncertainty about the success of off-site measures as well as the specific uncertainty relating to the concerns of Blackpool Airport and Warton Aerodrome and how they might influence management. Through DAS we recommended that the Applicant consider the merits of switching their primary mitigation strategy to one centred around seasonal restrictions and screening measures.</p>	Please refer to the response at row C1-016-02 of this submission.

Reference	SoS point	IP submission	Applicants' response
C1-016-05	8	<p>Whilst, Natural England notes Question 8 is directed to the Applicant, we highlight that we have also been engaging with the Applicant on alternative permanent mitigation measures in addition to the engagement relating to temporary mitigation options. We anticipate that the Applicant will be providing an update on alternative permanent mitigation as part of their submission. To prevent any delay in proceedings we wish to inform the Secretary of State of our position on this matter.</p> <p>In summary we welcome the Applicant's efforts to locate an alternative suitable permanent mitigation area. However, based on the alternative option that has been presented to us, we have advised the Applicant that it does not represent suitable mitigation. Therefore, with regards to permanent mitigation, we advise that Newton-with-Scales remains the only viable option from an ecological perspective which has been presented by the Applicant so far. Our most recent DAS response outlining our comments regarding alternative permanent mitigation is included in Annex 1.</p>	Please refer to the response at row C1-016-02 of this submission.
C1-016-06	12	<p><b>Habitat Regulations Assessment (HRA)</b></p> <p>We welcome the opportunity to provide further advice on submitted documents. We reiterate that our response to question 6 provides our final position in relation to alternative temporary mitigation for the impact of temporary habitat loss during construction and potential removal of AEoI subject to review of submitted documents.</p> <p>We note the Applicant's updated ISAA [REP6-024] and advise that our response to R17.2.2 outlined in [REP7-049] is still applicable. We maintain that mitigation is required for both permanent and temporary impacts and in the absence of the proposed measures at Newton-with-Scales to mitigate for permanent habitat loss we would not be able to rule out an AEoI for golden plover. We confirm that our position remains the same, that based on the updates in the OEMP [REP6-115] regarding long term monitoring and deliverability of management measures at Newton-with-Scales, AEoI can be ruled out for golden plover (and indeed other relevant SPA features). The updates made included confirmation that surveys will be undertaken monthly over the duration of the project (30 years) to inform any adaptive management measures and a commitment to update the final EMP with the detail on the group who will carry out the monitoring/management. At present Newton-with-Scales remains the only suitable option identified by the Applicant and our advice included in [REP7-050] remains the same. A further update on alternative permanent mitigation is also included in response to Question 8 and included in Annex 1.</p>	Please refer to the response at row C1-016-02 of this submission.
C1-016-07	13	<p>Natural England has reviewed [REP7-034] and signpost to our advice relating to this topic submitted a Deadline 6 (point 2 [REP6-190]). The updates made at Deadline 7 do not change our advice issued at Deadline 6. Therefore, there is no further detail on which to provide further additional advice as to whether proposed measures to reduce bird strike risk could potentially negatively impact the proposed mitigation areas for the Ribble and Alt Estuary SPA. Further detail on the likelihood of implementing trigger levels for SPA features would be useful, as this factor could provide further context on the likely frequency of implementing the measures and the subsequent risk of negative impacts on the proposed mitigation areas. However, we wish to highlight that the ongoing conversations around bird strike risk and establishing trigger levels are outside of Natural England's remit.</p>	The Applicants note Natural England's position is unchanged. The Applicants refer to their Response to the Secretary of State's Letter Dated 12 March 2026 (C1-029.39) and the outline Wildlife Hazard Management Plan (oWHMP) which describe the process for defining trigger levels. The Applicants also note that a commitment was made in the updated oWHMP (REP7-034) to include Natural England as a consultee when agreeing the trigger levels post consent as part of the detailed WHMP. The Applicants also refer to their response to paragraphs 10 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-016-08	14	<p>The response provided to questions 6, 8 and 12 outline updates relating to outstanding HRA issues. We do not have any other HRA matters to raise. Should the Secretary of State request further detail on any of the outstanding HRA matters discussed above we will provide further comment.</p>	The Applicants note Natural England's response.
C1-016-09	16	<p><b>Marine Physical Processes, Subtidal and Intertidal Ecology</b></p> <p>We welcome the Applicant's commitment to undertake pre- and post-construction surveys to inform the assessment of sandwave recovery. However, careful consideration needs to be given to the frequency of surveys, particularly post-installation, to accurately capture recovery of the sandwaves. Multiple bathymetric</p>	The Applicants welcome this response and would refer to paragraphs 1.5.2.11 - 1.5.2.14 of their response to the Secretary of State's Request for Information Dated 12 March 2026 (C1-029.39). In addition, the Applicants refer to their responses to paragraphs 23, 25 and 26 of Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	SoS point	IP submission	Applicants' response
		survey datasets (i.e. a time-series) may be needed to demonstrate recovery of sandwaves particularly within the MCZ. Therefore we consider this matter progressed but not resolved. tWe also note and welcome the Secretary of State request in question 17: "...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." We agree that the Applicant should also secure further surveys of sandwave recovery if the initial post-construction survey does not indicate full recovery or if impacts are found to be greater than those predicted in the Environmental Impact Assessment (EIA).	
C1-016-10	22	<p>We note the Applicant's updates at Deadline 6 and Deadline 7 and firstly wish to highlight that the updates do not include any refinement to the impacts with regards to lasting habitat loss/change within Fylde MCZ. Therefore, our view remains unchanged from the end of Examination, and we continue to advise that Measures of Equivalent Environmental Benefit (MEEB) are required to compensate for lasting habitat loss/change from the placement of cable protection within Fylde MCZ [REP6-193]. tWe have had ongoing discussions with the Applicant through DAS engagement regarding concerns around the deployment of cable/scour protection and the requirement for a new Marine Licence from the Marine Management Organisation (MMO) during the O&amp;M phase. From reviewing the updated documents, we note that the Applicant has updated the MCZ Assessment [REP7-031] and Outline OOMP [REP7-021] at Deadline 7 to limit the deployment of cable/scour protection outside of Fylde MCZ to the first 10 years. We note that the Applicant has also updated their position to state that inside Fylde MCZ, deployment of any cable/scour protection during the O&amp;M phase will require a new Marine Licence Application from the MMO. Therefore, we confirm that this has resolved our concerns; RI_A8, RI_C2, and RI_I13 in our Risk and Issues log [REP6-193] and we would also consider matter NE.BE.2 to be agreed in the Statement of Common Ground (SoCG) [REP6-100]. IWe note that the Applicant has also updated the wording in the MCZ Assessment and CoT116 to include the wording "<i>Within the Fylde MCZ, sandwave clearance, which will only be undertaken by Controlled Flow Excavator, will be deposited in close proximity to the works and only within the portion of the Order Limits overlapping the Fylde MCZ.</i>"</p> <p>Whilst we consider this to be a positive inclusion, we maintain that further consideration should be given to boulder clearance and measures to ensure that impacts will be reduced during removal. For example, not using a boulder plough and ensuring that boulders will be redeposited in similar habitat type and randomly to avoid linear structures which may disrupt sediment transport. Therefore, the following concerns in our Risk and Issues Log have been progressed but not resolved; RI_B4, RI_C24 and RI_I9.</p>	<p>The Applicants welcome Natural England's confirmation of issues being resolved in relation to deployment of cable/scour protection during the O&amp;M phase, and the progress made on issues regarding seabed preparation.</p> <p>The Applicants have updated the Commitments Register (F1.5.3/F09) and Outline Offshore Cable Specification and Installation Plan (J15/F06) to secure the commitment that no boulder ploughs will be used within the Fylde MCZ, and that boulders that are relocated will be redeposited in similar habitat type and randomly to avoid linear structures, which may disrupt sediment transport. More information on these updates is provided in the Applicants' response to paragraph 27 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). Following these updates, the Applicants consider this matter closed.</p>
C1-016-11	23	Natural England highlights that several concerns relating to marine physical processes have been addressed by the Applicant through the Examination process and we have highlighted where concerns were addressed in our Risk and Issues log at Deadline 6 [REP6-193]. Additionally, we welcome the Applicant's updates at Deadline 6 & Deadline 7 and advise that these updates go some way in addressing our outstanding concerns around mitigation as outlined in our response to Question 22. aNatural England maintains it still has concerns regarding a lack of mitigation in relation to marine and coastal processes for; Unexploded Ordnance (UXO) clearance, intertidal work area, cable protection within shallow nearshore waters (i.e. MLWS to Depth of Closure), and cable protection within Fylde MCZ.	The Applicants welcome this response and have responded to the topics below respectively.
C1-016-12		<p><i>UXO clearance</i></p> <p>We note that the Applicant has now scoped UXO into the EIA assessment for physical processes [REP5-030]. Further information/assessment has been provided in relation to Worst Case Scenario (WCS). However, Suspended Sediment Concentrations (SSCs) have not been assessed. Additionally, we maintain that UXO should be moved outside of designated sites prior to detonation.</p>	<p>The Applicants refer to their response to paragraph 28 of the of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). The Applicants would further refer to the following previous submissions: (i) the Applicants response to Annex 3.2.9 to RR– Natural England (RR-1601) - Appendix B (Physical Processes) (PDA-016), and specifically REF 1601.B.14 therein; and (ii) Applicants' Response to Deadline 6 Submissions from IPs (REP7-041) Table 2.8 (ID NE3).</p> <p>The Applicants highlight that, as secured in Condition 20(1)(a) of Schedules 14 and 15 to the draft DCO (REP6-013), no low order UXO clearance can be undertaken until a method statement for low order UXO clearance has been submitted to and approved in writing by the MMO in consultation with the relevant SNCB. Therefore, Natural England will have an opportunity to provide</p>

Reference	SoS point	IP submission	Applicants' response
			<p>further comment post-consent, when the method statement is submitted for approval.</p> <p>Overall demonstrating that the risk of any clearance activities being required within the Fylde MCZ is low, and if clearance is to occur, then the impacts to SSCs would be negligible.</p>
C1-016-13		<p><i>Intertidal work area between Mean Low Water Springs (MLWS) to Mean High Water Springs (MHWS)</i></p> <p>We acknowledge and welcome that the intention is for the Applicant to bury the cables in the intertidal and nearshore. We also note that the Applicant has updated the wording of CoT133 at Deadline 7 [REP7-009] to state “no cable/scour protection shall be deployed in the intertidal area between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS) during the construction and operation and maintenance phases”. This addresses risks and issues raised in relation to disruption of sediment transport over the lifetime of the project.</p> <p>However, with regards to temporary infrastructure in the intertidal, insufficient evidence on the duration of the impacts and potential changes to marine and coastal processes has been presented to support the argument that the benefits of using the cofferdams outweigh the loss of sediment. As with other marine Cable NSIPs we advise mitigation measures such as the first project installing the ducts for both projects should be considered to facilitate recovery. In the absence of the information and proposed mitigation we continue to advise that monitoring of geomorphological receptors in the intertidal should be considered (please see below in ‘Monitoring’).</p>	<p>The Applicants welcome that Natural England have acknowledged progress on these points.</p> <p>The Applicants refer to their response to paragraph 23 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14). Following these updates, the Applicants consider this matter closed.</p> <p>The use of temporary infrastructure in the intertidal area will be finalised in the Landfall CMS, required under condition 18(1)(e) of the Deemed Marine Licences at Schedules 14 and 15 of the DCO (REP6-013), which will require agreement in writing from the MMO. Any monitoring proposed will also need to be agreed with the MMO, as required under condition 18(1)(d) of the Deemed Marine Licences under Schedule 14 and 15 of the DCO (REP6-013).</p> <p>The Applicants would reiterate that the use of cofferdams would not result in the loss or change of sediment. As detailed in response to Natural England’s comments on Outline Landfall CMS Figure 3 in Appendix B (REP6-151), the Applicants confirm that where exits pits are located in the intertidal region trenching will be undertaken within the confines of the cofferdams during low tide events. The excavated material would be removed and stored in a temporary working area(s), so it is not at risk of erosion or dispersion due to tides. Excavated material will therefore be preserved to facilitate backfilling to reinstate the intertidal area to pre-construction sediment type and level. This will ensure limited impacts during the construction phase and a return to baseline conditions following the removal of the cofferdams, ensuring that there is no loss of sediment.</p>
C1-016-14		<p><i>Nearshore work area between MLWS and the Depth of Closure</i></p> <p>We remain concerned that the placement of cable protection within shallow nearshore waters (i.e. MLWS to Depth of Closure) could modify the nearshore hydrodynamic regime, interrupt sediment transport, resulting in morphological change. <b>We maintain our position that a commitment should be made to avoid or minimise cable protection between MLWS and the Depth of Closure. If such a commitment can’t be made, further detail on; numerical modelling (as with our R&amp;I comment: RI_B20) and location, height, volume, orientation and type of cable protection between MLWS and the Depth of Closure should be provided to fully inform the assessment on sediment transport processes.</b></p> <p>To resolve this issue, further information is required to provide the necessary comfort to Secretary of State that if required, mitigation measures can be applied to identified WCSs, to sufficiently manage down secondary impact zone/indirect impacts to Feature Of Conservation Importance (FOCI) and designated site interest features.</p>	<p>The Applicants refer to their response to paragraph 24 of the Secretary of State’s Letter Dated 20 May 2026 (S_SoSQ_14). Following these updates, the Applicants consider this matter closed.</p> <p>The Applicants would further reiterate their response to paragraph 19 of the Secretary of State’s Letter Dated 12 March 2026 (C1-029.39).</p>
C1-016-15		<p><i>Monitoring</i></p> <p>Whilst we welcome the inclusion from the Applicant of sandwave monitoring (Question 16) and the Secretary of State request for further monitoring (Question 17), the IPMP [REP6-104] currently only includes post-installation (O&amp;M phase) monitoring of the effect of sediment transport and sediment transport pathways on cable burial. However, it does not include any provision for monitoring of changes to coastal or nearshore morphology in relation to cable burial/protection. Therefore, we continue to advise the Applicant to include a commitment to carry out <b>monitoring of geomorphological receptors</b> in relation to cable</p>	<p>Please see the Applicants response at row C1-016-13 of this response.</p>

Reference	SoS point	IP submission	Applicants' response
		<p>burial/protection for the intertidal work area. Whilst the Applicant included further information on the MDS for exit pits and cofferdams in relation to temporary habitat loss, insufficient evidence on the duration of the impacts to potential changes to marine and coastal processes from temporary infrastructure e.g. cofferdams has been provided.</p> <p>We continue to advise that the Applicant undertake monitoring of the recovery in the intertidal works area to ensure impacts are not greater than predicted in the Environmental Statement. These should be included for consideration in the IPMP. Please also see point RI_B17 of our R&amp;I Log [REP6-193].</p>	
C1-016-16		<p><b>Cable protection within Fylde MCZ</b></p> <p>Natural England has provided our final position on cable protection location and design in relation to physical processes in our final Risk and Issues log [REP6-193] refs; NE4, RI_B2 and RI_B18.</p>	The Applicants note Natural England's position and would refer to their response at Procedural Deadline A to Natural England's representations (PDA-014) and subsequent submissions, specifically REP4-100 and REP7-041.
C1-016-17	29'	<p><b>Other Onshore Ecology</b></p> <p>In [REP5-182] and [REP6-192] we provided advice on previous iterations of the outline Landfall Construction Method Statement. Natural England has reviewed [REP6-151] and confirms the following risks and issues raised in [REP5-182] have been resolved: ref 4, ref 6 and ref 8 which also resolve RI_G48 in our Risk and Issues Log [REP6-193]. These issues are resolved due to the confirmation that a stone trackway will not be used to access the foreshore and due to the clarity provided on the location of the landfall temporary construction compound work areas. We also note and welcome that the sediment removed while digging the exit pit will be stored and preserved within the temporary cofferdam to prevent risk of erosion or dispersion during construction due to tides.</p>	The Applicants welcome the confirmation from Natural England that these matters are resolved.
C1-016-18		<p>Our advice in ref 1, ref 2, ref 5 and ref 7 [REP5-182] has not been resolved. Our advice in ref 3 has been partially resolved following sight of the National Vegetation Classification (NVC) survey report. However, CoT44 has not been updated as advised, and outstanding concerns remain, outlined in RI_G1 [REP6-193]. No further update has been included regarding our concerns raised in RI_G4 [REP6-193] and section 1.3 of [REP6-192].</p> <p>Following review of [REP6-151] we therefore still have concerns which have not been satisfactorily resolved to ensure the outline Landfall Construction Method Statement is as robust as possible at this stage of the development. Our outstanding concerns which remain unresolved since Deadline 6 are as follows:</p>	The Applicants have provided responses to these points in subsequent rows. The Applicants have also updated the wording of CoT44 within the Commitments Register (F1.5.3/F09) to undertake a pre-construction survey of the foredunes at Landfall to map the dune habitat. The Outline Landfall CMS (S_D4_22/F03) has also been updated to include this future survey. The Applicants also note that as the Landfall CMS forms part of the CoCP, Natural England will be consulted on the detailed Landfall CMS as secured under Requirement 8 of Schedules 2A and 2B of the draft DCO (REP6-013).
C1-016-19		<ul style="list-style-type: none"> <li>CoT39 – Concerns remain as the commitment does not flag that the works are located within the Ribble Estuary SSSI, where 'Assemblages of breeding birds – Sand dunes and saltmarshes' are a supporting interest feature of the site. This comment is captured in ref 2 [REP-182].</li> </ul>	The Applicants refer to their Response to Deadline 5 submissions from Statutory Consultees and other organisations: Natural England - Rev F01 (REP6-172) which addresses this point.
C1-016-20		<ul style="list-style-type: none"> <li>CoT44 - We reiterate that clarification is needed on the 100m distance from the works to Lytham St Annes Dunes SSSI. As previously advised the sand dunes are accreting, therefore whilst the distance from the SSSI site boundary from the works may be 100m, the distance from the frontal dunes is likely less (approximately 50m) (ref 2 and ref 3 [REP5-182]), when considering the accretion to the edge of the frontal dune. Therefore, depending on the actual distance to the dunes (when works commence) there may be potential for impacts from construction works at landfall. This comment is captured in ref 3 [REP-182] and reflected in RI_G49 on [REP6-193].</li> </ul>	<p>The Applicants refer to their response to Natural England within their response to Deadline 6 Submissions from IPs (REP7-041).</p> <p>As stated in previous responses on this topic throughout the Examination, the 100 m offset from the Lytham St Annes Dunes SSSI (CoT44) has been defined to take into account the natural dune accretion, ensuring that no working areas encroach on the dune system (which therefore also includes no working areas on the dunes of the Ribble Estuary SSSI which are located within the 100 m offset). The Applicants have updated the wording of CoT44 within the Commitments Register (F1.5.3/F09) to be include a to undertake a pre-construction survey of the foredunes at Landfall to map the dune habitat. This is secured in Schedule 2A&amp; 2B, Requirement 8 of the Draft DCO (REP6-013).</p> <p>With regard to the potential impacts on ornithology within the Ribble Estuary SSSI, no permanent surface infrastructure will be located at landfall, and all construction activities will be undertaken in line with the seasonal restrictions as described in CoT129 of the Outline Landfall CMS (REP5-116). The Outline</p>

Reference	SoS point	IP submission	Applicants' response
			Landfall CMS forms part of the Outline CoCP, which is secured in Schedule 2A& 2B, Requirement 8 of the Draft DCO (REP6-013).
C1-016-21		<ul style="list-style-type: none"> <li>Clarity of the depth of cable burial under the dunes, which should take into consideration data presented in the NVC survey, and hydrological monitoring (presented in the Hydrological Risk Assessment) as detailed in CoT128. Further information is available in RI_G1 [REP6-193]. In summary our outstanding concerns at Deadline 6 relating to cable burial depth and impacts on Ground Water Dependent Terrestrial Ecosystems (GWDTE) i.e. dune slack vegetation have not been progressed. The Outline Hydrogeological Risk Assessment of Lytham St Annes Dunes SSSI ([REP6-140], paragraph 6.1.1.2) notes that "further evidence for a shallow water table within one metre of the surface was observed to the east of the dunes", going on to say, "it is not known whether this is laterally extensive further to the west". The NVC survey data should be used to inform understanding of the ground water hydrology providing an insight of locations where a shallow water table exists due to the presence of dune slack vegetation. In addition, paragraph 6.1.1.4 flags that if the cable is installed within the blown sand there is a high risk that the water table will be dewatered as a result of cabling. However, if cabling occurs within the glacial clays, the risk is very much reduced. Paragraph 6.1.1.2 also notes "the site has a relatively simple hydrogeological conceptual model, supported by boreholes advanced to the west and east of the dune system. These proved the thickness of the blown sands deposits making up the dunes to be 14 metres in thickness". Therefore, Natural England need confirmation that the cable will be buried in the glacial clays (below 14m) and that cabling at this depth is technically feasible, especially at this location where the cable needs to emerge on both sides of the dunes within the Transition Joint Bays (TJBs). Additional boreholes may be required within the dune system along the actual alignment of the proposed cables, to determine the depth of glacial clays. In addition, further groundwater monitoring (typically using a data logger installed in a dipwell) should be undertaken before and after construction to monitor the potential effects where impacts cannot be avoided.</li> </ul>	<p>The Applicants refer to their response to Natural England within the response to Deadline 6 Submissions from IPs (REP7-041).</p> <p>The Natural England SoCG (see NE.OE.3 of REP6-179) outlines that in relation to detailed information on location of transmission joint bays and exit pits and trenchless technique, the Applicants and Natural England are agreed. Natural England state the following: "<i>Noting that confirmation on the location of transmission joint bays and exit pits and trenchless techniques will be provided at detailed design stage, Natural England accept that as much information has been provided as possible at this stage. However, we highlight that mitigation should be secured, as set out in Appendix G6 to our Deadline 6 response.</i>"</p> <p>The mitigation and requirement to provide further detail within the detailed Hydrogeological Risk Assessment(s) and the detailed Landfall CMS(s) is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (REP6-013). Natural England will be a consultee to the discharge of this requirement.</p> <p>The Applicants refer to the Natural England SoCG (see NE.OE.1 of REP6-179) in relation to the updates previously made to CoT128. The Applicants maintain their position that they are unable to commit at this stage to increasing the minimum drill depth beneath the Lytham St Annes Dunes SSSI. Final depths will be determined once contractors are appointed and the detailed design is undertaken post consent.</p>
C1-016-22		<ul style="list-style-type: none"> <li>Detail on the cable alignment under Lytham St. Annes Dunes SSSI and St. Annes Old Links Golf Course BHS (R1_G9, [REP6-193]). As noted in R1_G3 [REP6-193] we require further details of the location of TJBs in Blackpool Airport and the foreshore, the cable alignment under the sand dunes and cable depth to determine the potential for impacts on sand dune SSSI features associated with Lytham St. Annes Dunes. This issue was raised in our Relevant Representations and captured in R1_G9 [REP6-193], "depending on the required distance between the cables this could result in the cables underlying a significant proportion of the SSSI dunes and relict dunes".</li> </ul>	Please refer to the response above in row C1-016-21 above.
C1-016-23		<ul style="list-style-type: none"> <li>Distance between the 6 cables considering the potential effects of heat transfer noted in R1_G9 [REP6-193] and combined effects of drought noted in R1_G10 [REP6-193] have not been considered.</li> </ul>	Heat transfer has been considered within Section 3.4.3 sub-section <i>Impact on groundwater temperature through operational cable heating</i> within the Outline Hydrogeological Risk Assessment (REP6-140).
C1-016-24		<ul style="list-style-type: none"> <li>The outline Landfall Construction Method Statement outlines core working hours, but no update has been included to CoT18 to account for tides and subsequent changes to core working hours (ref 1 [REP5-182]).</li> </ul>	The Applicants refer to their response to Deadline 5 submissions from Statutory Consultees and other organisations: Natural England - Rev F01 (REP6-172).
C1-016-25		<ul style="list-style-type: none"> <li>We advised in ref 7 [REP5-182] that the outline Landfall Construction Method statement should clearly set out future survey requirements to inform detailed design and to ensure that at this stage project surveys will be sufficient to avoid impacts to ecological receptors. Alternatively, commitments should be made to avoid impacts, outline that pre-construction surveys will be undertaken to finalise mitigation measures and outline that the survey methodologies will be agreed with regulator/s in consultation with relevant SNCB beforehand. We advised that the commitment to undertaking surveys should be strengthened to include a requirement that where there are residual concerns in relation to recovery, monitoring will be undertaken with a requirement to undertake remediation, should impacts be greater than predicted. The following should be captured in the 'Future Survey' section: When considering the point raised above in relation to CoT44 it may be necessary to carry out accurate mapping of the frontal edge (i.e. undertaking a topographical survey against a known benchmark) to help determine proximity of the works to the dunes, visual inspection of recent aerial photography shows the vegetated section of</li> </ul>	<p>Please refer to the response in row C1-016-20 above in relation to the Applicants' position that there will be no direct impacts to the dunes habitats.</p> <p>The Applicants further refer to their response to Deadline 5 submissions from Statutory Consultees and other organisations: Natural England - Rev F01 (REP6-172).</p> <p>The 'Future Survey' section Outline Landfall CMS (S_D4_22/F03) confirms that hydrogeological monitoring will take place (including pre-construction and post-construction). The scope of the monitoring will be agreed with Natural England and the Environment Agency. The survey results will be provided to Natural England and the Environment Agency within an agreed timeframe.</p>

Reference	SoS point	IP submission	Applicants' response
		<p>the dunes appears to be much closer than 100m. Rates of current/recent accretion can be calculated using Lidar digital elevation data (available freely from the Coastal Regional Monitoring Programme) - this would help to determine how much additional accretion is likely to occur before the start of works.</p> <p>oFurther detail is required on the potential need for additional boreholes and at what point in the survey schedule this requirement may be determined. One borehole is currently mentioned to be undertaken at St Annes Old Links Golf Club (abstraction borehole ref: GWA_01). This point is captured in RI_G4 and RI_G9 [REP6-193] and [REP6-192].</p> <p>Additional ground investigation and groundwater monitoring (to monitor changes to the position of the water table pre- and post-construction should be included, unless the impacts are shown to be avoided). This has been included in CoT128 which should also be referenced and updated in section 1.8 'Future Surveys' of the final Landfall Construction Method Statement. This is considered necessary as the additional investigation works relate to Lytham St Annes SSSI and St Annes Old Links Golf Course.</p>	

## 2.16 The Crown Estate (C1-017)

**Table 2.16: C1-017 - The Crown Estate Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-017-01		<p><b>Morgan and Morecambe Offshore Wind Farms Transmission Assets Application for Development Consent Order by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited</b></p> <p>We refer to your letter of 12 March 2026, in which you requested various parties to provide updates or information on issues that have been identified by the Secretary of State during his consideration of the above Application.</p> <p>At paragraph 35 of your letter, you asked The Crown Estate to provide:</p> <ol style="list-style-type: none"> <li>1. Further information regarding if and when another developer can be found for the Morgan Offshore Wind Project; and</li> <li>2. Further information regarding any funding or guarantee mechanisms which could be made available to ensure that financial liabilities (such as compulsory acquisition powers or claims for blight) can be met if the Secretary of State grants consent for the Morgan Transmission assets.</li> </ol> <p>The Crown Estate's response to this request is set out below.</p>	The Applicants note this response.
C1-017-02	35	<p><b>New Developer for the Morgan Offshore Wind Project</b></p> <p>Under the leasing arrangements for all offshore wind farms, there are standard provisions which set out the steps to be taken when an agreement for lease is terminated by the project company. These include the right to require any relevant consents and grid connection agreements to be transferred to The Crown Estate or to an alternative company identified by The Crown Estate. These provisions allow The Crown Estate to manage the exit of a developer from a project and facilitate, where practicable, the transfer of consents and grid connection agreements to a new developer/project company.</p> <p>The Morgan Offshore Wind Project remains a strategically important project in our Round 4 leasing programme. The Crown Estate considers that the Morgan project may represent an attractive investment opportunity with an attractive risk proposition for an incoming developer given that the development consent order (DCO) for the generating assets<sup>1</sup> has already been granted and the DCO for the transmission assets is now well-advanced. The Crown Estate also considers that the shared transmission DCO between Morgan and Morecambe provides the quickest route to market for an incoming developer on the Morgan site, allowing both sites to generate electricity at the earliest opportunity.</p>	The Applicants note this response, and welcome TCE's subsequent announcement (in a Press Release of 8 June 2026 - <i>The Crown Estate to launch tender for Morgan offshore wind site in the Irish Sea</i> ) that they will commence the leasing process for the Morgan offshore wind farm site next month, with the intention of having a developer in place this year.

Reference	SoS point	IP submission	Applicants' response
		<p>On that basis, The Crown Estate is confident that a new developer (project company) could be appointed ahead of the development milestones associated with the Morgan Offshore Wind Project DCO, having regard to prevailing conditions.</p> <p>This includes the time limit for commencement of development, which is seven years from 22 September 2025. To reduce uncertainty, The Crown Estate's intention would be to identify a new project company for the Morgan Offshore Wind Project by Q1 2027, subject to approval through TCE's governance requirements for a project entering agreement for lease.</p>	
C1-017-03	35	<p><b>Funding</b></p> <p>Following the termination of the leasing arrangements for the Morgan Offshore Wind Project by the existing project company, the Project (and the associated transmission assets development) can only proceed if The Crown Estate appoints a new project company.</p> <p>As part of this exercise, The Crown Estate would need to enter into a new agreement for lease with the new project company and, as a matter of routine in circumstances such as this, The Crown Estate will (among other things) ensure that any new project company appointed: Has sufficient experience of developing offshore wind farms.</p> <ul style="list-style-type: none"> <li>• Has good financial standing and sufficient funding to undertake the development of the Morgan Offshore Wind Project and the transmission assets.</li> <li>• Can meet the financial costs and liabilities associated with the requirements of the relevant DCOs and the exercise of compulsory acquisition powers.</li> </ul> <p>The Crown Estate also notes that the draft Transmission Assets DCO already prevents the exercise of compulsory acquisition powers until such time as the financial security conditions in draft Article 33 are met. These conditions require the Secretary of State to approve the financial standing of any new project company, providing further assurance that financial liabilities associated with compensation claims will be met.</p>	<p>The Applicants note this response and refer to the Applicants' response within row C1-012-02 above. In addition, the Applicants note their response (along with those of TCE) to paragraphs 32 – 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>

## 2.17 Michael Alexander Plank (C1-018)

**Table 2.17: C1-018 - Michael Alexander Plank Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-018-01	<p><b>Planning Examination inspection for the application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an order granting development consent for the development for the Morgan and Morecambe Offshore Wind Farm Transmission Asset (M&amp;M OWL TA)</b></p> <p>The Secretary of State (SoS) for the Department of Energy Security and Net Zero (DESNZ) has issued three project updates during 2026. The first addressed issues relating to the applicants claims of a three scenario solution options; two wind farms and a common transmission system, one wind farm (either Morgan or Morecambe) and a single transmission system. Although the applicants propose such options there is no apparent financial or costing model variation defined within the document set for such eventualities. The second update requested for further information from applicant stakeholders across a range of subjects to be submitted by the 13th of April.</p> <p>The third update informed all stakeholders that the statutory deadline date of the 29th April had been pushed back to 14th May due to local elections on 7th May, 2026.</p> <p>I have made three submissions to this Planning Examination to date raising many issues and risks, this being the fourth, but there has been no response nor any indication of developments other than awaiting the final decision now scheduled for 14th May.</p> <p>My first submission proposed an alternative route running the power cable corridor along the Ribble estuary but alternative routes for this Examination were deemed out of scope!</p> <p>My second submission identified key issues; firstly, the lack of document maturity, lack of governance and the lack of a consolidated risk definition and associated risk contingency. Secondly, I also identified many project deficiencies i.e. no case for change, no business case, no investment case or net present value (NPV) et al. Since the final submission, 29th October, it has become clear certain processes e.g. the Treasury's Green book has been ignored by the applicants</p>	<p>The Applicants note this response. The Applicants have responded to all submissions made as part of this examination. All documents, including the Applicants responses, can be found in the document library on the Planning Inspectorates website.</p> <p>With regards to site selection, the Applicants would also refer Mr Plank to Volume 1, Chapter 4: Site Selection of the Environmental Statement and accompanying annexes which explains the Applicants approach to site selection. Additionally, further information can be found in section 2.31.2 in The Applicants' Response to Relevant Representations Part 1- Introduction and thematic responses (PDA-005) on why the River Ribble is not suitable alternative route.</p> <p>The Applicants refer Mr Plank to section 1.15 of the Applicants response to the SoS RfI (C1-029.39) regarding funding for Morecambe Offshore Windfarm Ltd.</p>

Reference	IP submission	Applicants' response
	<p>as there is no evidence, nor reference having been made to this process. The alignment of HM Treasury's Green Book (appraisal and business case process) and the Planning Inspectorate process (specifically for Nationally Significant Infrastructure Projects, or NSIPs) requires a parallel, integrated approach where the business case's strategic rationale is solidified before and during the planning submission to ensure viability. The Green Book ensures public value (economic, environmental, social) while the Inspectorate assesses planning merits. I propose if the Green Book had been utilised by the Applicants many of the issues I raised would have been addressed.</p> <p>My third submission raised concerns with respect to the financial provenance of Morecambe OWL, especially as it held very low levels of equity (circa £1,000), to prosecute their part of the transmission assets project. On reviewing Morecambe OWL provenance on HM Gov's Companies House website, the Company's postings looked immature at best. In fact, today's inquiry suggests the Company is in the process of being struck off! Over to Copenhagen Infrastructure Partners (CIP) I assume but there are concerns by Spanish authorities questioning CIP's business practices used in wind farm projects.</p>	
C1-018-02	<p><b>Bird Strike Threat - Page 2 and 3 items 4-14.</b></p> <p>In the second update, bird strike was raised for further clarification between the Applicants and BAe Systems. Freckleton Marsh, part of the Ribble Estuary in Lancashire, is a vital historical site for migratory and breeding water birds, with extensive reclamation since 1806, including major embankments in 1837. Historically, it supported breeding waders like Lapwing and Redshank, and served as a significant site for migratory Knots, Dunlin, and Pink-footed Geese. Over many years BAe System have done a brilliant job protecting these bird communities, preventing damage to their aircraft and local communities from bird strike. With the potential of up to 11 years of noise/vibration from construction, it is impossible for BAe Systems to endorse a risk-free environment, as aircraft activity will continue and birds to thrive there. Especially, as the UK government has recently reached an agreement with Turkey to provide a three-year training and support contract alongside its recently ordered Eurofighter Typhoon aircraft with the final assembly of the 20 Turkish jets set to take place at the BAe systems site in Warton, Lancashire. It also needs to be noted that by the mid 2030s Tempest (GCAP), the 6th generation aircraft currently in design with BAe Systems and partners, will be in the prototype and flight test phase so bird strike will continue to be a significant risk. I have every confidence BAe Systems will continue their professional approach to bird strike mitigation due to their known flight operations and test flight programmes. BAe Systems cannot be held responsible to mitigate unknown, unknowns created by other entities but the Applicants and their construction partners must be fully accountable for any further incidence or disturbance instigating bird strike threats. Freckleton, has already experienced the worst ever military disasters in the country's history (killing 61 people including 38 children &amp; 2 teachers) the local community cannot be allowed to be put in this situation again!</p>	Please refer to the response within row C1-005-07.
C1-018-03	<p><b>Equestrian Centre - Page 9 item 47</b></p> <p>The Wrea Green Equitation Centre in Fylde, Lancashire, is facing potential closure after over 40 years in operation due to this proposed onshore cable corridor for new offshore wind farms. The project involves installing underground cables through the area, with construction activity planned near the centre on Bryning Lane.</p> <p>Impact on the Equitation Centre:</p> <ul style="list-style-type: none"> <li>• Safety and Welfare Concerns: states that the planned work, which includes test drilling, noise, and vibration on land bordering the school, would make it impossible to continue operating. The owner noted that horses are flight animals that cannot handle the disruption, making the site unsafe for riding lessons.</li> <li>• Operational Disruption: The centre, which accommodates roughly 300 riders a week, including many with disabilities, fears the noise and vibration—expected 24/7 for an extended period—would "bankrupt" the business.</li> <li>• Broader Context:</li> <li>• Community Opposition: The project has led to significant opposition from residents and local leaders, who describe the proposed route as cutting the Fylde in two, threatening rural livelihoods, and impacting greenbelt land.</li> <li>• Alternative Routes: local people have suggested using alternatives like the River Ribble or River Wyre to avoid built-up areas, farmland, and businesses like the Wrea Green Equitation Centre</li> </ul>	Please refer to the response within row C1-008-01 regarding Wrea Green Equitation Centre.
C1-018-04	<p><b>Radar Performance Interference by Wind Turbines.</b></p> <p>There is a significant risk that Radar performance is adversely affected by interference from wind turbines. This affects radar performance by creating false targets, signal blockage (shadowing) and clutter, which can severely degrade</p>	The Applicants note that wind turbine generators do not form part of this application. Impacts on radar performance were assessed as part of separate Development Consent Order applications (the Morecambe Offshore

Reference	IP submission	Applicants' response
	<p>surveillance, aviation, and weather radar systems. The large, rotating blades reflect radio waves, producing spurious signals often mistaken for aircraft, while the physical structures create radar shadows, leading to potential gaps in coverage. With recent events resulting from the Gazan and Iran wars and associated threats, it has already been muted that the UK needs an Iron Dome Battle Management Centre similar to the one installed by Israel. Such installations will exploit C4I/C4SRI type technologies that do not need their capabilities degraded by wind turbine interference. Such capability will be required to detect and to protect against from both traditional and asymmetrical threats whilst being linked to an array of surface to air missiles to provide a deterrent and ultimately defence of the United Kingdom. This a significant National Security risk that needs careful consideration by the MoD and our Military Forces.</p>	<p>Windfarm Generation Assets and the Morgan Offshore Wind Project (Generation Assets), both of which have now been granted development consent.</p>
C1-018-05	<p><b>To Concluded; Challenges and Threats to the United Kingdom.</b>  Many issues have been raised with no feedback. The M &amp; M TA Examination was initiated to generation an output of 1,980 MW. That has now been reduced to 480 MW due to the Morgan OWL being unsuccessful in securing Allocation Round funding. This resulted in one of their major backers pulling out and other financial partners deciding not to progress Morgan OWL further. To all intents and purposes Morgan OWL and its associated transmission assets has been abandoned but no formal change of this change has been acknowledged, registered nor presented to stakeholders like myself by the Planning Inspectorate. There is an apparent lack of alignment between Governments Departments involved in this project i.e. the Treasury, the DESNZ, the Dept Housing, Communities &amp; Local Government (Planning Inspectorate) and the risk to the MoD/Military Forces. Failure in such large organisational constructs is typically initiated at the interfaces usually due to ineffective communications and/or inferior process interfaces. Tell me this is not so in this case? I look forward to the Green Book proposal being prepared by Lancashire County Council in conjunction with Fylde Borough and Wyre Councils being fully considered while this project's determination is being made.  UK growth is flat lining. Inflation is 3 %, 50% high than the Bank of England's 2% target. These metrics will only worsen due to the conflicts in the Middle East. High energy costs are adversely impacting UK's industry and consumers is very concerning. UK industrial energy costs are 4 x those of the USA and 8 x those of Texas. The UK is losing wealth generating businesses e.g. Refining, Chemicals, Steel making and Fertiliser production capabilities due to these exorbitant costs, which is bad enough, but the UK losing independent, self-reliant capabilities crucial to satisfy current and future demands. The UK has been subsidising renewables for 40 years and such costs/subsidies are now locked in for a further 20 years due recent Contract for Difference (CfD) agreements. Such high energy costs are now disadvantaging the UK's economy and devastating the industrial landscape, even inward investor potentials are questioning whether the UK is a viable location for investment. The latest casualty being OpenAI who has dramatically pulled its planned £31 billion investment in Britain. The tech giant has scrapped plans for a huge AI data centre because of Britain's crippling high energy costs and the Government's Net Zero policies. The project would have created thousands of well-paid jobs and helped turn the UK into a global AI superpower. As of February 2026, approximately 140 new data centre projects have applied for connections to the UK's electricity grid (Ref Workplace Insight). But how many of these connections will the grid be able to effectively satisfy? This a creating a Capacity Crunch: The proposed data centre capacity demands a further 50GW than current supply, which is truly significant, and in many cases projects face waiting times of over ten years for grid connections. The retirement of the Gas and Nuclear generation fleets are scheduled in the next 2/3 years with no planned replacement. Significant carbon taxes are being added to gas prices making them far more expensive than actual market costs. Also, European Union carbon taxes are anticipated to be added as well, artificially increasing such costs still further. In so doing it makes gas turbine fleet replacement virtually unjustifiable due to an inflated gas price of £145 plus /MWh versus £92/MWh for a fixed offshore turbine. Three companies make 75% of the world's large gas turbines: GE Vernova, Siemens Energy, and Mitsubishi Power. All three have backlogs stretching to 2029 or 2030, and wait times have gone from two or three years to five or seven. Bloomberg estimates more than \$400 billion in planned gas plants could be delayed or cancelled because there aren't enough turbines being made.  Similarly, many nuclear assets are due for retirement in the next few years. Heysham 1 &amp; Hartlepool power stations have already had their service lives extended but Hunterston B and Hinkley Point B are in the defueling phase. Replacement capabilities, Hinkley Point C and Sizewell C, are due to enter operational service 2030 and 2035 respectively. However, Hinkley Point C's poor build/cost performance questions the revised operational implementation targets. There is a high probability of scheduled completion being pushed even further to the right and with further cost escalation. Note. Hinkley Point C original estimated cost was £18 Billion but the latest forecast for 2030/31 completion is £49 Billion. 8As can be seen from a few points made above the UK's Energy Security is far from secure. Most (77%-80%) of renewable energy is funded by inward investment. Therefore, the lucrative profits made from green subsidies will, after EITB and tax</p>	<p>The Applicants refer to their response to paragraphs 32 - 35 of the most recent SoS Rfl 2 (S_SoSQ_14) and the response to row C1-007-08 of this submission.</p> <p>In so far as Mr Plank's comments relate to the merits of the application, the Applicants refer Mr Plank to the Applicants' Closing Statement (REP7-042) and to the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39).</p>

Reference	IP submission	Applicants' response
	concessions have been taken into account, be returned to foreign countries/companies extracting more wealth from the UK economy. The trajectory of the net zero strategy does not give the UK the competitive advantage the UK deserves as is becoming yet another National security at risk. This time an economic one!sFinal thoughts on the Premeditated Industrial Destruction? of the United Kingdom and its reversal.	

## 2.18 Andrew T Coney on behalf of Christine Fare, Jone Fare and Fare Farms Limited (C1-019)

**Table 2.18: C1-019 - Andrew T Coney on behalf of Christine Fare, Jone Fare and Fare Farms Limited Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-019-01		<p><b>BACKGROUND</b></p> <p>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.</p> <p>1.2 I attach at Appendix 1 my Preliminary Hearing Submission with enclosures.</p> <p>1.3 I attach my Further Hearing Submission for Deadline 6 at Appendix 2 with enclosures.</p> <p>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).p1.5 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.</p>	<p>The Applicants can confirm that the two offers referred to in the response to the SoS on the 13 April 2026 remain for the consideration of the tenant While these offers reflect the Applicants considered position, they remain keen to see the matter resolved in a constructive manner.</p> <p>The Applicants consider that there are two paths available to progress the matter:</p> <ol style="list-style-type: none"> <li>1.The tenant provides robust evidence and commentary on why the current offers are not acceptable. To allow for further meaningful negotiations.</li> <li>2.The Applicants and tenant agree to progress the matter through Alternative Dispute Resolution (ADR), with the aim of avoiding unnecessary further delay. The Applicants suggest referral to a RICS administered ADR scheme, and the applicant is prepared to consider Independent Determination, elected to be binding on both parties, as a pragmatic way of moving matters forward.</li> </ol>
C1-019-02		<p><b>2. RESPONSE</b></p> <p>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.a2.2 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.</p> <p>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.</p> <p>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</p>	<p>As stated in the Applicants response on the 13 April 2026 (C1-029.39), the Applicants are of the opinion that by instructing industry experts they have demonstrated that adequate mitigation measures could be put in place (subject to planning) to allow the Tenant to continue their dairying business</p>

Reference	SoS point	IP submission	Applicants' response
		<p>establishment of a beef enterprise.t2.5 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.</p> <p>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.</p> <p>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 many months.n2.8 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.e2.9 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</p>	
C1-019-03		<p>CONCLUSION</p> <p>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.</p>	The Applicants note this response.

## 2.19 Defence Infrastructure Organisation (on behalf of the Ministry of Defence) (C1-020)

Table 2.19: C1-020 - Defence Infrastructure Organisation Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-020-01	7 and 9	<p>Thank you for your letter dated 12 March 2026 within which you have requested information in relation to the above project. The Secretary of State requires a response from the Defence Infrastructure Organisation (DIO) regarding birdstrike concerns and discussions in connection with questions 4, 7 and 9. These responses are detailed below; for ease the relevant question is replicated as a heading. 4. <b>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.</b></p> <p>The MOD can confirm that the objection and concern responses provided relate primarily to the potential for the Newton-with-Scales site (Work nos. 49A/49B) to degrade aviation safety by increasing birdstrike risk. This is due to the proximity and location of the Newton-with-Scales site relative to the aerodrome, in particular the runway, its extended centreline and therefore the airspace in which aircraft are approaching or departing that runway, and to existing environments which support or routinely contain those large and/or flocking bird species hazardous to aviation safety. The introduction of an enhanced attractant environment at Newton-with-Scales is likely to both draw birds across the extended centreline of the runway and to provide an enhanced attractant/potential focal point close to airspace where aircraft are at critical stages of flight increasing the potential for birdstrike.</p> <p>It should be noted that the MOD is concerned that the creation/enhancement of any substantial environment(s) attractive to those large and/or flocking bird species hazardous to aviation on any site close to BAE Warton would be likely to result in degradation of aviation safety by providing an attractant for large and/or hazardous bird species to cross the aerodrome, the runway, and approach/take off climb airspace. Elements of the Morgan and Morecambe Offshore Wind Farms Transmission Assets that were of particular concern are the temporary construction mitigation areas proposed at Lea Marsh (Works nos. 35A/35B and Works nos. 44A/44B) and Lytham Moss (Works nos. 35A/35B). The risks posed by these temporary construction mitigation areas would be mitigated through the discharge of requirements found at Schedule 2A, Requirement 27 and Schedule 2B,</p>	The Applicants refer to their response to paragraphs 18 to 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	SoS point	IP submission	Applicants' response
		Requirement 27 in the draft Development Consent Order (Document reference: C1/F09, Rev: F09 22, dated October 2025)	
C1-020-02	7 and 9	<p><b>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.</b></p> <p>and</p> <p><b>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 Newtonwith-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.</b></p> <p>There is some complexity in responding separately to the requests for comments on the submitted oWHMP (question 7) and the principle of whether the impact of the proposed ecological mitigation can be managed through the oWHMP setting bird population levels as well as triggers/thresholds for active management (question 9). As such the MOD provide the combined response below to questions 7 and 9</p> <p>The MOD acknowledge that an updated oWHMP (Document reference: S_D3_8/F04 dated 29 October 2025) has been submitted for review.</p> <p>Whilst the submitted oWHMP is, in principle and subject to the acceptability of any Wildlife Hazard Plan submitted in accordance with requirements found at Schedule 2A, Requirement 27 and Schedule 2B, Requirement 27 in the draft Development Consent Order (Document reference: C1/F09, Rev: F09 22, dated October 2025), acceptable to address the potential harm caused by the temporary construction mitigation areas proposed at Lea Marsh (Works nos. 35A/35B and Works nos. 44A/44B) and Lytham Moss (Works nos. 35A/35B), it would not be considered acceptable to mitigate the potential harm caused by implementation of the permanent mitigation area south of Newton-with-Scales (Work nos. 49A/49B).</p> <p>The MOD understand that the works proposed at the site south of Newton-with-Scales are intended specifically to enhance features of the site for the birds currently present, and to provide space for birds displaced at the substation sites. The result of these works is likely to be intensification of bird populations. Whilst at present these populations may be distributed across the wider area, the enhancement works proposed would be considered likely to provide a greater attractant to hazardous bird populations, effectively increasing the density of hazardous birds in this location.</p> <p>The MOD would suggest that developing the Newton-with-Scales site to provide bird mitigation is problematic. In Table 1.4 of a previous draft oWHMP (Doc. Ref. S_D3/8/F03 dated 22 October 2026) the applicant has stated that with regard to the Newton-with-Scales site and the works designed for ducks and waders 'The intention of this mitigation is not to increase overall bird numbers in the area, but simply to enhance the area for the birds currently present and provide a safe space for birds displaced at the substation sites.' It is noted that the area referred to is not quantified. The more recent draft oWHMP (Document reference: S_D3_8/F04 dated 29 October 2025) omits this language and instead, at B2.2, refers to the potential for the Newton-with-Scales site to provide habitat for golden plover, to mitigate temporary impacts on teal and black-tailed godwit, and 'to benefit a far greater suite of terrestrial waders and wildfowl'. The MOD cannot accept any increase in the number of birds close to BAE Warton as such increases are highly likely to degrade aviation safety. By virtue of the location of Work nos. 49A/49B relative to BAE Warton, in particular the runway (closer to the extended centreline than either of the substation sites) and the approach and take off/climb airspace, and to those existing environments that provide habitats/attractive environments for those large and/or flocking bird species</p>	<p>The Applicants refer to their response to paragraphs 18 and 21 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). Specifically, the Applicants would note that the mitigation proposals at south of Newton-with-Scales have been updated to reflect discussions with BAE and Natural England (documented in updates to the oEMP and oWHMP), reflecting the process for updates and approval that is secured under Requirements 12 (Ecological management plan) and 27 (Wildlife Hazard Management Plan) of Schedules 2A and 2B of the draft Development Consent Order.</p> <p>As set out in the Applicant's response to SoS Letter dated 12 March (C1-029.39), the purpose of the mitigation at south Newton-with-Scales is not to increase overall bird numbers in the area, but to secure and enhance existing habitats for bird populations already present within the local environment, including those displaced from the substation sites. The majority of potential habitat attractants at the south of Newton-with-Scales mitigation area already exist but would be managed using the measures set out in the oWHMP.</p> <p>The birds for which the mitigation is designed are already recorded at Newton-with-Scales and in the surrounding area. This is evidenced in the Applicants' site surveys over the 2022/23 and 2023/24 seasons (see Volume 3, Annex 4.2: Wintering and migratory birds technical reports Part 1 and 2 (APP-092 and APP-093)), which confirm that that the area is already used by waders and wildfowl. The Applicants' surveys also identified that the terrestrial habitats at the onshore substation sites supported small assemblages of breeding and non-breeding birds (see section 4.12 of Chapter 4: Onshore and Intertidal Ornithology (APP-090).</p> <p>In this context, the Applicants do not agree that the proposals would result in an intensification of hazardous bird populations such that aviation safety would be degraded. The Applicants' assessment of bird strike risk at Warton Aerodrome (Appendix C of the oWHMP (S_D3_8/F05) concludes that the Transmission Assets Project would not give rise to an increased bird strike risk relative to current conditions.</p> <p>With regard to management, the Applicant's position is not that management would "control" birds in a manner inconsistent with the purpose of the habitat, but rather that proportionate monitoring and management provide an appropriate safeguard to ensure that the mitigation functions as intended and does not result in unanticipated effects. This approach reflects established practice for mitigation sites located within operational landscapes and is consistent with the overall conclusion that the Project does not introduce an increased aviation safety risk.</p> <p>The Applicant therefore maintains that the south of Newton-with-Scales mitigation site is appropriate in principle, that it does not seek to increase bird numbers in proximity to BAE Warton, and that the concerns raised fall within matters that have already been assessed and addressed through the Examination process. The Applicants further wish to note that whilst the MoD do not consider that a management plan (i.e. the oWHMP) is appropriate on ornithological grounds, they have not suggested that it is ineffective mitigation in dealing with the potential for bird strike.</p> <p>Finally, in respect of the proposal for a requirement in relation to the number of hazardous birds above the levels currently present, the Applicants do not</p>

Reference	SoS point	IP submission	Applicants' response
		<p>hazardous to aviation safety, those Works are likely to result in the movement of hazardous bird species through/across air space where aircraft are at critical stages of flight to the detriment of aviation safety.</p> <p>The applicant has suggested that a management plan might provide a means to mitigate the harm created by the enhancement of the Newton-with-Scales site. The MOD do not consider it appropriate to seek to mitigate the intended effect of enhancing a habitat specifically to attract and support bird species by controlling the number of those bird species. The MOD does not think that a management plan is appropriate to mitigate the increased hazard to aviation safety introduced by the Newton-with-Scales proposals.</p> <p>As set out in the Secretary of State's question, the MOD consider that, if the Secretary of State considers a management plan to be appropriate, a requirement must be set out that no number of hazardous birds above the levels currently present can be tolerated. The MOD suggest that this approach would directly contradict the purpose of habitat creation on the Newton-with-Scales site.</p>	<p>consider that this is required on the basis that the oWHMP clearly states that the proposed approach would ensure that all operations at Blackpool Airport and Warton Aerodrome "were aligned with CAP 772 guidance <b>and ensure bird strike risk at the aerodromes does not increase beyond its current level due to the Transmissions Assets.</b>"</p>

## 2.20 Armistead Barnett on behalf of T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough (C1-021)

Table 2.20: C1-021- Armistead Barnett on behalf of T J Kirkham, Mrs J E Worlock and Mrs J A Myerscough Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-021	<p>MOW – Our Clients: Messrs. Kirkham, Worlock and Myerscough – Reference: EN020032</p> <p>We refer the questions raised on the 12th March 2026 and in particular item 40. We act on behalf of Eastham Hall Farm and the proprietors Messrs. Kirkham, Worlock and Myerscough. We are pleased to give the Secretary of State an update on the current status of negotiations with the Morecambe Offshore Windfarm scheme. The Morecambe scheme have forwarded to us some revised Heads of Terms and we continue to negotiate those Heads of Terms with the Project. Progress is being made and we are hopeful that we may be able to successfully conclude negotiations for the Easement strip, however, the Heads of Terms submitted in respect of the mitigation area are totally unrealistic with the financial offer being substantially less than rental value of the land, also the Project are unable to indicate exactly how much land is required and bearing in mind the large amounts of land being acquired for this Project from this particular Landowner it is essential that they are given some indication of what may be required. The Project also seem to be under the illusion that the Landowner can continue to farm the land whilst the land is in use for mitigation which in our opinion is totally unrealistic. Without a substantial change from the Project Heads of Terms for an Option on the mitigation area will not be concluded.</p> <p>We would also point out that this mitigation area extends onto third party land being Messrs. Bradley and RaynerPorter where although we have not been asked to comment we would once again confirm that it is highly unlikely that terms will be agreed unless there is a noticeable change in the offer from the Project.</p>	<p>The Applicants have engaged with representatives of Eastham Hall Farm, who continue to participate in active and productive negotiations on the required land rights for the project. The Applicants are pleased to confirm the matter in relation to the Ballam Road access has been agreed between the parties. The outstanding matters between the parties are of a commercial nature.</p> <p>The Applicants last met with the land agent on the 11 June 2026 to discuss all matters in relation to Eastham Hall Farm including the mitigation land and are hopeful that voluntary agreement can be reached shortly.</p> <p>The Applicants can confirm that the works necessary to establish, manage and maintain the proposed mitigation land are detailed within the Outline Ecological Management Plan (J6/F06), and were also explained to the Agent during a meeting on 11 June..</p>

## 2.21 Janette McCormick (C1-022)

Table 2.21: C1-022 - Janette McCormick Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-022-01	<p>I am writing as Interested party reference number . I fully endorse the comments made in the attached document from , Partner for TLT LLP on behalf of a number of parish councils including Newton with Clifton and Freckleton Parish Councils.</p> <p>In addition, I would like to add further a comment about: 'Noise and Vibration'. My home is within the noise receptor area for the substations. This subject was not covered during the public enquiry and I, like other residents whose homes are close to the substations and cable corridors, do not therefore have any clarity or understanding of what levels of noise and vibration will be emitted during construction and operation. Hence, there has been inadequate consultation on this matter and a lack of opportunity to ask appropriate questions about how noise and vibration will affect the local community.</p>	<p>The Applicants would refer to Section 12 of the Applicants Closing Statement (REP7-042), which sets out how the noise and vibration assessment was undertaken, explains how noise mitigation has been secured for the construction phase in the draft DCO in order to minimise impacts, and finally confirms that FBC agrees, as set out in the SoCG, that Requirement 18 of Schedules 2A and 2B to the draft DCO (REP6-013), which provides the imposition of an operational noise limit for the substations, represents reasonable control of operational noise from the Onshore Substations (FBC.NV.16 in S_D1_6.3 F03).</p>

Reference	IP submission	Applicants' response
C1-022-02	Landscape and Visual' The Morecambe substation site will be visible from my home and there are still no detailed visual representations of what we will be looking at on a daily basis. As the inspectors are aware the ground slopes steeply and we do not know whether the buildings will be built into or on top of the ground, making it impossible to consider how effective any attempt at screening may be.	The Applicants note Ms McCormick's concerns Please refer to the response within row C1-007-24 of this submission which addresses landscape matters.
C1-022-03	Suitable Alternative Route' Sufficient consideration needs to be given to the suitable alternative route via Stannah/Hillhouse.	The Applicants refer to row C1-005-09 of this submission which addresses the siting position regarding Stanah and Hillhouse.
C1-022-04	Site Selection' The selection of sites should be revisited particularly as Morgan may not be proceeding. As the larger of the two substations, with a need for greater space, Morgan seemed to drive the site selection. If only Morecambe proceeds the whole 'benefit vs harm' argument would need to be revisited.	The Applicants refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14)
C1-022-05	Number of unresolved issues It is apparent that there are many unresolved issues including bird strike risk and aviation safety. How can this application be properly considered until all outstanding matters have been resolved?	The Applicants' final position on all matters raised during Examination is set out in the Applicants' Closing Statement (REP7-042) and the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39). In relation to bird strike and aviation specifically, the Applicants would refer to paragraphs 17 and 18 of their response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14) for the latest position in developing the proposed mitigation in order to address the bird strike concerns.

## 2.22 BAE Systems (C1-023)

Table 2.22: C1-023 BAE Systems Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-023-01	4	<b>Q4. BAE Systems (BAE) and Defence Infrastructure Organisation (DIO) are requested to confirm whether their bird strike risk concerns relate solely to the Newton-withScales site (Work No. 49A/49B) or all mitigation sites proposed by the Applicants.</b> BAE Systems see that Lytham Moss, Newton with Scales, Lea Marsh and Fairhaven are all sites which present concerns from a bird strike and air safety perspective. Collectively, these onshore mitigation sites are located in, or adjacent to critical flight paths serving both Blackpool Airport and BAE Warton. Proposed habitat modifications, supplementary feeding, and vegetation management are likely to increase bird activity at altitudes utilised by aircraft, creating a significant and persistent risk of bird strikes. The combination of temporary and permanent mitigation measures, proximity to runway approaches, and potential inconsistencies in ongoing management necessitate rigorous assessment and continuous monitoring to safeguard aviation operations. In our assessment, a project of this scale, involving extensive earthworks, is likely to serve as a substantial bird attractant along its entire length, particularly for gull species. Likewise, permanent mitigation areas are likely to attract birds, especially when sited near airports or within aircraft approach and departure corridors. Each of these locations have been assessed individually within the Report commissioned by Ontrack AGM on behalf of BAE Systems.	The Applicants refer to their response to paragraphs 18 and 21 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). Specifically, the Applicants would note that the mitigation proposals at south of Newton-with-Scales have been updated to reflect discussions with BAE and Natural England (documented in updates to the oEMP and oWHMP), reflecting the process for updates and approval that is secured under Requirements 12 (Ecological management plan) and 27 (Wildlife Hazard Management Plan) of Schedules 2A and 2B of the draft Development Consent Order (REP6-013).
C1-023-02	7	<b>Q7. 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</b> BAE Systems proactively commissioned a report to assess the impact of bird strike at Warton Aerodrome by a Subject Matter Expert, which concluded that the oWHMP is misleading, inaccurate, and inappropriate in its assessment of bird strike risks. This assessment has been shared with the Applicant and DIO, followed up with a virtual meeting to discuss our key areas of concern within the report. BAE Systems SME articulated the areas still in disagreement, particularly not being able to mitigate Newton-With-Scales. As noted in the oWHMP, the Ribble Estuary adjacent to the BAE Warton site represents one of the largest overwintering grounds for migratory ducks and geese in the UK, and potentially Europe. Any large-scale, prolonged earthworks near to the airfield, as	Please refer to the response within row C1-023-01.

Reference	SoS point	IP submission	Applicants' response
		proposed, are almost certain to attract significant numbers of these birds, in addition to gulls from the extensive colony on the southern side of the estuary. Such activity presents a material and persistent risk to aviation safety and subsequent risk to life, that cannot be adequately or tolerably mitigated under the current proposals from the Applicants. BAE Systems do not agree that the oWHMP demonstrates that even with the commitments made by the Applicants to monitor and manage hazards, that the proposed works can proceed without increasing bird strike risk at the airports (1.1.1.3). That is evidenced by the multiple factors highlighted within the impact assessment report, including the potential for large-scale earthworks and mitigation areas to attract significant bird activity, the proximity of the works to critical flight paths, and the limitations of proposed monitoring and control measures.	
C1-023-03	10	<b>Q10. 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.</b> BAE Systems and the Applicant now have an NDA in place to allow us to enable data sharing as required. BAE Systems have commissioned a bird strike assessment and risk assessment on the impact that the proposed mitigation areas would have on Warton's Bird Strike Risk Matrix. BAE Systems have proactively shared our Bird Strike Risk Matrix with the visibility of the number of bird strikes for the last 5yrs. The data behind this matrix is recorded as a mandatory occurrence report through the MAA/CAA software portals (ASIMS/ECCAIRS) as a regulatory requirement. BAE Systems have also supported several calls and email requests to discuss the above to enable progression.	The Applicants refer to their response to paragraphs 21 and 22 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

## 2.23 Lynn Adele Plant (C1-024)

Table 2.23: C1-024 - Lynn Adele Plant Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-024-01	Yet again I am writing to express my deep concern at the proposed Morgan & Morecambe Windfarm. The farce continues, because even now the applicants having failed to meet the ""final"" deadline and are being given the opportunity to add to their application. The original application was obviously flawed and it should have been rejected at the original deadline. There is now a financial dilemma with the Morgan part of the project, they have no financial backer but are still being given the opportunity, at this extended late stage, to scurry round to desperately save their poorly planned operation. The process has been flawed beyond belief, but still they have been allowed to continue.	The Applicants refer Ms Plant to the Applicants response to paragraphs 31 – 35 of their response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-024-02	Regarding my objections to the project in general, I have repeated myself numerous times, and so I will be brief. My objections are:	The Applicants note this response.
C1-024-03	The inevitable devastation to wildlife. The devastation to our countryside.	The Applicants have prepared a comprehensive Environmental Impact Assessment and management plans as part of the application, which is intended to identify, assess, and ensure that potential effects on wildlife and the wider environment are appropriately addressed, mitigated, and, where possible, avoided or reduced.
C1-024-04	The compulsory acquisition of precious farmland which will ruin the livelihoods of many people, not just the farmers but also the businesses that rely on them, and on whom they rely.	Throughout the application and examination process, it has been the Applicants' preference to secure voluntary agreements for the acquisition of land, and rights, for the land which is required. The Applicants have been undertaken substantial engagement with landowners (see the Land Rights Tracker, REP7-032) in order to ensure that reliance on compulsory acquisition powers is minimised, and is used only as a 'last resort' where voluntary agreement cannot be reached. Please refer to Section 17 of the Applicants

Reference	IP submission	Applicants' response
		Closing Statement (REP7-042) where details of the Applicants approach to compulsory acquisition is set out.
C1-024-05	The substations, about which our communities are still ignorant, due to lack of clarity and information from the applicants. The impact on our rural landscape will be horrific. The inevitable persistent humming will permeate the atmosphere and will have negative effects on the learning of the pupils of the numerous local schools.	The Applicants note Ms Plant's concerns regarding the level of information provided, potential landscape effects, and from the proposed substations. Please refer to the response within row C1-007-24 which addresses landscape matters. The Applicants also note that Ms Plant submitted commentary on the same points at Deadline 4 (see REP4-163) as part of a post-hearing submission. A comprehensive response was provided by the Applicants in their Deadline 5 submission – see REP5-129, paragraph 163.1. In respect of operational noise and vibration, please refer to row C1-022-01 of this submission.  On this basis, the Applicants consider that sufficient information has been provided to understand the nature of the proposals and their likely effects, and that the combination of robust assessment and secured mitigation ensures impacts are appropriately managed in accordance with accepted standards for a NSIP.
C1-024-06	The thousands of birds that migrate to local wetlands will have their flight paths altered, which brings me to my final and most worrying objection.  BAE cannot mitigate the risk of bird strike ... the risk is what it is, and it is too great for the Freckleton community. We have all lived with knowledge of the dreadful events of August 1944, when 61 people, including 38 children, were killed when an American plane crashed on Holy Trinity School. It is a very sad part of our history and will never be forgotten. This project WILL increase the risk of another air disaster, and we should not be put in that frightening position.  The irony is that there is a cheaper, shorter, and less obtrusive route which the applicants have persistently refused to consider.  I am praying that common sense will prevail and implore you to refuse this application.	Please refer to the response within row C1-005-07 for the Applicants latest position on bird strike concerns.

## 2.24 John Rossall Singleton (C1-025)

**Table 2.24: C1-025 - John Rossall Singleton Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-025- 01	Dear Sir Thank you for giving me the opportunity to comment on this application. I am sure toy know the area known as Fylde. Most of the highways in this rural countryside are below their best. We only have limited funding for all Lancashire. This project will further depreciate the road surface especially with regards to this project of destruction which will take years to rebuild. The road network especially in the countryside area are very narrow. I have been complaining regarding the transport network when family farms are re vamped and turned into business serving the wider public. These current large vehicles are turning the verges into mud corridors following the deep tracks of the wheels . tThe country life was the main reason most of us moved here to get away from the noise of transport vehicles. This noise from this project will be a huge concern to everyone. Apart from the noise, our concern is also the excavation of deep channels in our lands which affect our wildlife . All this disturbance and for what ...Net Zero. In my opinion, this government will not retain power at the next election or maybe sooner. Both opposition parties from what I hear are against this nonsense, and they will have to sort this mess out which will be caused by the implementation of such policies.	An Outline Construction Traffic Management Plan (oCTMP) was submitted and updated throughout the examination process (REP7-016). The requirement to produce the detailed CTMP(s) in accordance with the oCTMP in consultation with, and for approval by, the relevant highway authority, is secured by Schedules 2A and 2B of Requirement 9 of the draft DCO (REP6-013). As noted in the Statement of Common Ground (REP7-027), Lancashire County Council (LCC) have worked collaboratively with the Applicants to obtain necessary clarifications and proposals to mitigate the impacts of the development. LCC are content with the changes discussed within the workshops, in regard to the commitments contained within the outline CTMP. Section 1.13.3 outlines that where necessary and where agreed with the relevant highways authority, as a part of the detailed CTMP(s), post consent, video surveys may be undertaken of those local roads where it is considered that the passage of construction HGVs may cause deterioration of highways. The results will be discussed with the relevant highways authority and where

Reference	IP submission	Applicants' response
	Maybe you have guessed, I am against this project, but you have your job to be done, and I thank you for allowing to have my say, It is appreciated.	<p>it is agreed that damage has resulted from the passage of HGVs associated with construction work for the Transmission Assets a remediation strategy will be agreed with the highways authority.</p> <p>The Applicants would refer to Section 12 of the Applicants Closing Statement (REP7-042), which sets out how the noise and vibration assessment was undertaken, explains how noise mitigation has been secured for the construction phase in the draft DCO in order to minimise impacts (in particular, through requirement to produce the detailed Construction Noise and Vibration Management Plan, in accordance with the Outline CNMVP, which is secured by Requirement 8(2)(c) of Schedules 2A and 2B of the draft DCO (REP6-013).</p> <p>The Applicants Closing Statement confirms that FBC agrees, as set out in the SoCG, that Requirement 18 of Schedules 2A and 2B to the draft DCO (REP6-013), which provides the imposition of an operational noise limit for the substations, represents reasonable control of operational noise from the Onshore Substations (FBC.NV.16 in S_D1_6.3 F03).</p> <p>Details of the assessment of noise and vibration effects during construction and operation are outlined in section 8.11, with details of embedded mitigation measures provided in section 8.8 of this chapter.</p> <p>The Applicants have prepared a comprehensive Environmental Impact Assessment as part of the application, which is intended to identify, assess, and ensure that potential effects on wildlife and the wider environment are appropriately addressed, mitigated, and, where possible, avoided or reduced.</p>

## 2.25 Mary Barlow (C1-026)

Table 2.25: C1-026 - Mary Barlow Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-026-01	<p>The issue regarding the potential bird strike leaves me very anxious. I have already endured 3 years of mental health issues regarding this application and the possible prospect of having to vacate my home. I cannot imagine living through 11 years of construction outside my property but the thought of an increased risk of military air crash alongside this is totally devastating for me. The devastation this application is going to cause my family and community beggars belief and should never have been allowed to progress as far as it has. Why is the Stanah option not being fully investigated when all the local councils, parishes and our MP Andrew Snowden are championing it. M&amp;M have shown a total disregard to my family from day 1 of this application, taking away my future without even any concerns for my safety. I find the whole application disgraceful and how on earth can a company from another country put us in this situation! My own government should be there to protect me from them, not assist them. A company in Denmark has no empathy towards the Fylde and why would they, having probably never even been to the Fylde and are there to simply make a profit for their foreign investors.</p>	<p>The Applicants acknowledge Mrs Barlow's concerns regarding mental health and wish to emphasise that this is something the Applicants take seriously.</p> <p>The Applicants have previously addressed concerns relating to human health, including consideration of mental health at section 2.19 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). This confirms that an assessment of human health (including mental health) is contained in Volume 1 Annex 5.1: Human Health (REP6-040). This document also outlines various mitigation measures, which have been developed to ensure the continued health and wellbeing of the local population, as well as how these are secured through the draft Development Consent Order (REP6-013). The Applicants are committed to developing the Transmission Assets in a way that is sensitive to the local environment and community in order to minimise potential effects wherever possible. Impacts which have the potential to give rise to likely significant effects on the local community have been carefully assessed and appropriate mitigation identified throughout the Environmental Statement. Those measures are secured through the Requirements set out in Schedules 2A and 2B of the draft DCO (REP6-013).</p> <p>Please refer to the response within row C1-005-07 regarding bird strike.</p>

Reference	IP submission	Applicants' response
		<p>With regards to Stanah, please refer to row C1-005-09 of this submission.</p> <p>It is noted that NESO is continuing to identify Penwortham as the connection point for future offshore wind projects, including the East Irish Sea Transmission project (which is not currently part of the Holistic Network Design or other strategic planning exercises).</p>
C1-026-02	On Fares Farm, they should be allowed to continue their dairy farm that provides for us all without having to worry about compulsory purchase orders against them.	The Applicants note Mrs Barlow's concerns regarding Fares Farm. Please refer to Section 1.11 of the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39), and to the response within row C1-007-31.
C1-026-03	On Wrea Green Equestrian Centre, this is where my daughter learned to ride many years ago, it is a vital part of the community, has been supporting disadvantaged young children as long as I can remember and should be awarded the respect it deserves. Surely the equality act has not been recognised or included in this application with regards to the centre and should it have to close its doors to the public this would be catastrophic for all the young and disadvantaged children in our community.	Please refer to the response within row C1-008-01.
C1-026-04	On the landscape and visual impact on the village and in particular the receptors, there is no way this can be mitigated. The enormous structures will not only stand out like a sore thumb, they will emit considerable EMF's, light pollution, create undeniable noise pollution and scar the landscape forever. Languishing on our last bit of greenbelt, farmland and countryside that the whole community so dearly cherish. To me it is incomprehensible and disgusting that this is even given consideration.	<p>The Applicants note Mrs Barlow's concern that the above-ground elements of the Transmission Assets, such as the substations. Please refer to the response within row C1-007-24 which addresses landscape matters.</p> <p>The Applicants have previously addressed concerns regarding EMF and lighting. Please refer to The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> <p>With regards to noise, please refer to row C1-025-01 of this submission.</p>
C1-026-05	On the flooding issue, this is really quite simple, just come down and meet me on Lower Lane after some heavy rain and see the flooding for yourselves. This application will not improve the situation, it will make it ten times worse than it already is.	<p>The assessment of the potential for increased flood risk arising from additional surface water runoff is presented section 2.6.6 of Volume 3, Chapter 2: Hydrology and flood risk (REP6-059). Mitigation measures are also presented in Table 2.19.</p> <p>The CoCP includes measures in relation to flood risk during the construction phase, the final CoCP, which must be in accordance with the Outline CoCP, must include a surface water and groundwater management plan and is secured via Requirement 8(2)(i) of Schedules 2A and 2B of the draft DCO (REP6-013). Additionally, the Applicants have committed (see CoT11 of Volume 1, Annex 5.3: Commitments register of the ES (document reference REP6-042)) to preparation of detailed Operational Drainage Management Plans which are to be developed in accordance with the outline Operational Drainage Management Plan, the latest relevant guidance and in consultation with the Environment Agency and the Lead Local Flood Authority (being Lancashire County Council). This is secured via Schedule 10, part 10 of the draft DCO (REP6-013).</p>
C1-026-06	On the issue of the lack of funds, how on earth can a company continue down this path of not offering any compensation for what they are about to do and have no funding in place for the hundreds of substantial claims that will follow should the decision go their way.	The Applicants wish to emphasise that all parties who are impacted by the compulsory acquisition of land or rights have the right to claim compensation in accordance with the statutory compensation code. The Applicants have previously set out detail in relation to this, and in relation to the funding of the Applicants, in Section 17 of the Applicants Closing Statement (REP7-042). Regarding the latest position on Morgan's funding specifically, please refer to the Applicants response to paragraphs 31 – 35 of their response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	IP submission	Applicants' response
C1-026-07	This application needs to be stopped in its tracks and if they refuse the option of Stanah then it should be scrapped once and for all.	Please refer to row C1-005-09 of this submission.
C1-026-08	My final comment is that should the decision be to not approve then that should be final and we can therefore get on with our lives. We have been in limbo now for 3 years wondering if one day we can finish our extension and upgrades to our property they have stopped us from doing, having deemed our house worthless from day 1.	The Applicants note this response.

## 2.26 DWF Law LLP on behalf of Blackpool Borough Council, Blackpool Airport Properties Limited & Blackpool Airport Operations Limited (C1-027)

**Table 2.26: C1-027 -DWF Law LLP on behalf of Blackpool Borough Council, Blackpool Airport Properties Limited & Blackpool Airport Operations Limited Comments on Responses to the Secretary of State Consultation 1**

Reference	SoS point	IP submission	Applicants' response
C1-027-01		Submission on behalf of Blackpool Borough Council, Blackpool Airport Properties Limited, and Blackpool Airport Operations Limited 1. We write on behalf of Blackpool Council, and Blackpool Airport Operations Limited and Blackpool Airport Properties Limited (the latter entities collectively referred to as 'Blackpool Airport') further to the information request by the Secretary of State dated 12 March 2026, and the application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (following the withdrawal of Morgan OWL, Morcambe OWL is referred to in the singular as "the Applicant") for an Order granting Development Consent ("DCO") for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets ("the Proposed Development").n2. Blackpool Council and Blackpool Airport provide below the requested update to the ongoing land agreement negotiations with the Applicant. For the reasons outlined in this letter, Blackpool Council and Blackpool Airport respectfully request that protective provisions are included in the DCO to protect the safe and efficient operation for the Blackpool Airport. To this end, proposed drafting for such protective provisions is appended to this letter.	The Applicants note this response.
C1-027-02	38	Update on negotiations relating to (i) temporary possession powers in respect of the access to St Annes Beach via Starr Gate, and (ii) rights sought by the Applicants over the Blackpool Airport site 3. Blackpool Council and Blackpool Airport have engaged in discussions with the Applicant to resolve material outstanding points with the purpose of entering into, or agreeing heads of terms in respect of, three land agreements over land in the ownership of Blackpool Council and Blackpool Airport. The required land agreements are to cover: 3.1. An access agreement over the Starr Gate Access slipway, Blackpool; 3.2. An option for a deed of easement in respect of the St Annes Dunes (dealing with both access to St Annes Dunes during the carrying out of the Proposed Development and an easement to retain and operate equipment once the Proposed Development is energised); and 3.3. Agreement to enable the undertaker access and use of land within the Blackpool Airport boundary to construct, operate and maintain the development under the DCO.	Please refer to section 1.7.2 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-027-03	38	4. In relation to the Starr Gate slipway and the St Annes Dunes the parties have been unable to align on matters which the Council and Blackpool Airport consider to be fundamental to an acceptable commercial agreement, including: 4.1. The sum and basis of the liability cap and related insurance; 4.2. EMF study and mitigations; 4.3. The extent of termination rights; and 4.4. The scope of retained CA powers despite entry into a voluntary agreement	Please refer to section 1.7.2 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-027-04	41	5. The parties held their last 'all parties' meeting on 16 December 2025. There has been limited progress since this date to finalise any of the land agreements. The lack of progress and materiality of the outstanding points leave Blackpool Council and Blackpool Airport concerned that the DCO if granted will significantly interfere with the rights of operations of Blackpool Airport and will adversely affect the continued safe and efficient operation of Blackpool Airport. Of particular concern to Blackpool Council and Blackpool Airport is the lack of an EMF study, assessing the potential impacts to the continued safe and efficient operation of the Airport and its users	Please refer to section 1.7.2 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

Reference	SoS point	IP submission	Applicants' response
		(public, military, off-shore gas rig support and emergency services), and informing the requisite protective measures to be incorporated by the undertaker.	
C1-027-05		6. In the meantime, Morgan Offshore Wind Limited have issued an exit notice from the co-operation agreement entered into with Blackpool Airport. Blackpool Airport (as operator and a landowner) and Blackpool Council (as sole shareholder and a landowner). Blackpool Council and Blackpool Airport have not received reassurances that the agreed mitigations, studies (including EMF), project management and mitigation assessment costs and CAA approvals will be in place prior to commencement, and all expenditure will be provided by Morecambe and forward funded with no detriment to the Airport or Council budgets	Please refer to section 1.7.2 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-027-06		7. Consequently, Blackpool Council and Blackpool Airport respectfully request that protective provisions be included in the Development Consent Order (if granted), to ensure the continuous, safe and efficient operation of the Airport. Currently the safe and efficient operation of Blackpool Airport has not been secured through voluntary agreements between the parties, and no EMF study has materialised to enable a comprehensive understanding of the required mitigations which will result from implementation of the Development. To this end, proposed drafting for such protective provisions is appended to this submission.	Please refer to section 1.7.2 in the Applicants response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).

## 2.27 Rosaleen Forsey (C1-028)

Table 2.27: C1-028 - Rosaleen Forsey Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-028-01	<p>Introduction</p> <p>This is a response to the Secretary of State's 12 March 2026 document and request for further information. From local resident Ros Forsey, founder member of the, 'Fylde Says No Campaign', and regular attendee at all related consultation hearings. Members of, 'Fylde Says No', have attended all of the consultation hearings related to this application and we have carried out a number of public information and street consultation events, leafleted door to door and held street and beach protests. We continue to meet regularly to monitor the progress of this application and to reach out to local residents, many of whom are still unaware of this application. Whilst I welcome the extension of the deadline for the SOS decision regarding this application, I believe that the new deadline of 14th May 2026, is by no means realistic for the numerous and seemingly ever increasing list of matters still outstanding, to be properly and robustly interrogated and resolved. On this basis alone I believe that this application should be rejected. As the developers of the Morgan offshore aspect of this application have also withdrawn their financial backing and support, and this has apparently not initiated a simple change from one partner investor to another, but rather left a considerable time gap, with seemingly no replacement investor in sight. I'm at a loss to understand how this highly unusual situation can now lend itself to any realistic decision from the SOS to proceed. This application can no longer be clearly and fairly mapped to the consultation, as we are now being faced with an entirely different project altogether and one that becomes all the more different as the days pass and this time gap grows wider. In addition to the above and in relation to the relevant paragraphs of the SOS document my 5 key objections and comments by way of response to this doc are:</p>	<p>Over the course of the six-month Examination period and beyond, the Applicants have engaged with stakeholders, responding to questions, submitting detailed technical documentation, and where appropriate, refined our proposals.</p> <p>The Applicants have provided responses to all submissions made as part of this examination. All documents, including the Applicants responses, can be found in the document library on the Planning Inspectorates website. The Applicants maintain that the project is viable and will enhance the UK's energy security while supporting the delivery of its Net Zero commitments.</p> <p>Regarding the concerns related to the Morgan project, the Applicants refer Ms Forsey to its responses to paragraphs 31 – 35 of their response to the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14). In terms of the 'time gap' between the projects, the Applicants wish to reiterate that any other developer who steps in to progress the Morgan project would still be obliged to commence the works within the time period as has always been prescribed in Requirement 1 to Schedule 3A of the draft DCO (REP6-013).</p> <p>The Applicants note Ms Forsey's comments. The Applicants' final position on all matters is set out in the Applicants' Closing Statement (REP7-042), the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39) and the Applicants Response to Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>
C1-028-02	<p><b>Ongoing unmitigated birdstrike risks.</b></p> <p>The chosen route for the cables running from the Morecambe Bay offshore windfarm to the National Grid at Penwortham will pass close to both Blackpool Airport and BAE Warton Aerodrome. From day one of the ExA consultations led the issue of increased risk of bird strikes on planes and jets using both of these flight centres has been raised by various residents, groups and local representatives. Throughout the process these concerns were routinely dismissed in the most cavalier fashion, even to the point where it was suggested by representatives of the Applicant, M&amp;M, that concerned residents raising the matter were using 'overly emotional language' and exaggerating when sharing their concerns and</p>	Please refer to the response within row C1-005-07.

Reference	IP submission	Applicants' response
	<p>fears. What an unprecedented and strange way to respond to people asking questions relating to serious potential risks to their own and their family's lives. This did however serve to give attendees a flavour, very early on, of the tone the consultations were likely to take when addressing and communicating with local people and stakeholders and we were not disappointed in that respect. Apparently an agreement of some sort has now been made with Blackpool Airport in relation to this birdstrike risk but we are not privy as to what that might be as it is covered by a NDA. I am not alone in believing that it should not be permitted for the outcomes of negotiations of this serious nature where risk to life is a key factor, to be hidden behind NDAs. We can be forgiven for interpreting this as an ongoing lack of respect for local people and concern for their safety. As regards Warton Aerodrome, a different more transparent scenario seems to have unfolded there with representatives from BAE Warton repeatedly stating during the consultation and in local media interviews that the substantial risk of bird strikes on aircraft using Warton Aerodrome cannot be mitigated. Kier Starmer visited Warton Aerodrome in a hail of publicity on Tuesday 28th October 2025, not to discuss these serious issues as one might imagine, but to announce the signing of an £8 billion deal with Turkey, signed the day before to provide them with 20 Euro fighter Typhoon jets, with the first jets due to be delivered in 2030, with an option for more in the future. The building and testing of these jets will clearly coincide with the proposed cable work, should this project go ahead. In this scenario the existing possibility of a serious birdstrike on a high velocity jet along the Fylde would be further and dramatically increased. I don't need to be an aviation expert to know that such an occurrence would be no small matter, as it would cause a very serious, major 'accident', involving widespread destruction and loss of life. This project can surely not morally, ethically or legally be given approval whilst this stalemate exists?</p>	
C1-028-03	<p><b>Lack of Equality Impact Assessments</b>  As far as we are aware from having attended the hearings and asked many questions there, no EqIA has been carried out with regard to this proposed cable work. The most obvious and blatant omission in this regard being a lack of an EqIA to determine what the owners anticipate to be a devastating impact on the considerable numbers of disabled children and adults who currently enjoy horse riding facilities at Wrea Green Equestrian Centre. The owners of the centre, established in 1981 as an accredited Rider Accessibility Mark Centre specialising in tailored lessons for riders of all abilities, particularly those connected to the 'Riding for the Disabled Association' and 'Seaside Venture group', are most definite in their verdict that in the event of this project gaining approval Wrea Green would undoubtedly be forced to close. According to Riding for the Disabled Association (RDA) disabled people enjoy horse riding because it offers a unique combination of physical freedom, emotional connection, and a sense of achievement that is often hard to find in other activities. The RDA testify that 80% of disabled riders see physical improvements within just 12 weeks. What will become of the disabled riders who currently use Wrea Green RC, with the closest alternative being some 55 miles away in Knutsford, Cheshire? As repeatedly suggested, requested and ultimately, in some desperation, demanded during the consultation ... an EqIA needs to be carried out with regard to Wrea Green, with the utmost urgency before any decision can be made re this proposed cable project. In addition, we know from the Office for National Statistics that there are a disproportionate number of older people living along the Fylde coast, particularly within the Borough of Fylde, which has one of the highest median ages in the North West of England. Data indicates the area has a population structure significantly older than the national average. As of the 2021 census, 28.4% of Fylde's population (approx. 24,000 people) were aged 65 years or older. This is much higher than the 18.7% average across England. There is a steadily rising average age and between 2011 and 2021, the median age in Fylde increased from 47 to 50 years. By 2024, estimates suggest the median age to have reached 51.9, which is over 11 years older than the UK average. The 65+ population in the district is projected to grow by 56.5% between 2018 and 2043. An EqIA also needs to be carried out as regards this group because what these figures indicate is that older people as a protected group, (under the Equality Act 2010), will be disproportionately affected in terms of the disruption to Fylde infrastructure, including public transport, public roads and highways, (on pages 10-11 of the SOS doc it states that GTC Pipelines, Network Rail and NGET have withdrawn their objections, but I cannot find any evidence to support this claim).</p>	<p>Please refer to the response within row C1-008-01.</p> <p>The Applicants refer Ms Forsey to documents PIR-005, PIR-006, PIR-007 and PIR-008, which evidence the withdrawal of the objections.</p>
C1-028-04	<p>It's clear that this 11 year project, will particularly impact on those within the age groups mentioned here, residents who already experience disproportionate levels of social isolation and poverty, and are therefore at increased risk of loneliness and poor eating habits resulting in ill health and disability. Any reduced access to reliable and timely public transport will impact their access to local amenities including the targeted support services available to them along the Fylde coast. These include healthcare support, social and educational opportunities and shopping and banking options, thus along with the proposed closure of Starr Gate beach for up to 3 years, rendering many older people, particularly those with disabilities, little choice, but to live as virtual prisoners in their homes on a filthy, noisy building site for 11 years. Make no</p>	<p>Please refer to the response within row C1-008-02 regarding traffic. The Applicants have previously addressed concerns relating to beach access in section 2.5 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005). Following the discussions at the Hearings and in response to Hearing Action Points, the Applicants provided further detailed technical clarifications in relation to beach access in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (REP1-040). Further details of the public access to the beach during</p>

Reference	IP submission	Applicants' response
	mistake that for many of this age group, this outcome would mean they would be destined, should this application be approved, to end their days trapped in this way.	construction are set out in The Outline Open Space Management Plan which is at Appendix A of the Outline Public Rights of Way Management Plan (REP6-087). This sets out the discrete working areas that will be subject to access management during construction works ensuring public access across the majority of the beach remains uninterrupted throughout.
C1-028-05	<p><b>ExA Consultation Hearings - unfit for purpose</b></p> <p>I think it's fair to say that along with myself, 'Fylde Says No' and everyone who attended any of the ExA hearings during 2025 found the whole procedure wholly inadequate, with venues being chosen in far flung often inaccessible places situated nowhere near the suggested locations for the proposed cable work. Advertising was minimal and those who did manage to attend largely did so as a result of information that was shared by word of mouth. There were no leaflet drops to local homes, no signs or billboards in public places, no adverts on local TV or radio, no loudspeaker vans touring the area sharing information about these potentially hugely important consultations. Nothing. Those of us who did manage to find our way along to these events were then left with questions unanswered, requests for information ignored and matters of concern repeatedly overridden. These 'consultations' were unfit for purpose.</p>	<p>The Applicants disagree with this comment. The Applicants liaised with the Case Team to ensure that the venues selected for the examination hearings were suitable and fit for purpose, while also ensuring that the selected venues were accessible.</p> <p>Notice of all hearings were published in local publications as well as the Transmission Assets website. Additionally, Interested Parties could sign up for updates via the Planning Inspectorate's website to receive notifications throughout the process.</p>
C1-028-06	<p><b>Proposed Substation Location and related 'consultation'.</b></p> <p>The consultation inadequacy outlined above was not least demonstrated in relation to the location of the proposed substations in Freckleton. These substations are proposed to be built unusually close to residential and other properties and stakeholders have been apparently requesting renderings and/or photomontages since 2023 to evidence the visual impact of on them. These have never been provided, despite assurances during the hearings that they would be! It was therefore not possible to assess whether any of the proposed screening mentioned for example, would actually screen the substations from local homes at all. When photographs and mock up models were requested, as they repeatedly were, with local residents even offering their own funds to cover the cost, still nothing appeared. This situation continued until a sudden rushed release of a huge number of inadequate AI photos which were shared with Interested Parties by the applicant a few weeks ago, (presumably at the request of the SOS, with the absence of these being so blatantly obvious with them having been mentioned so often during the hearings but not having appeared!). In the event these were, true to the poor form we have grown accustomed to with the Applicants, wholly inadequate, and of absolutely no help to those living in the vicinity. They did not represent a real life view of anything at all. The term 'shabby' comes to mind I'm afraid! In addition to the above 4 key arrears of concern I'd like to mention one last issue that directly impacts me and my home:</p>	<p>With regards to site selection, the Applicants refer Ms Forsey to Volume 1, Chapter 4: Site Selection of the Environmental Statement and accompanying annexes which explains the Applicants approach to site selection for the onshore substations.</p> <p>The Applicants provided visualisations of the proposed onshore substation throughout the examination process, as set out in Volume 3, Annex 10.3: Visual baseline technical report (REP6-052).</p>
C1-028-07	<p><b>Flood Risk</b></p> <p>The Applicants have already caused flooding and damage to land drains during their preliminary investigations on two separate occasions so their track record in this regard is already questionable. The hugely increased flood risk resulting from tunnelling under the Sand Dunes at Starr Gate Beach [REDACTED] will undermine any possibility of local residents being able to access adequate affordable flood protection insurance cover going forwards thus destining them/us to live in a state of heightened anxiety for evermore awaiting the loss of all we own to the sea.</p>	<p>The assessment of the potential for increased flood risk arising from additional surface water runoff is presented section 2.6.6 of Volume 3, Chapter 2: Hydrology and flood risk (REP6-059). Mitigation measures are also presented in Table 2.19.</p> <p>The CoCP will include measures in relation to flood risk during the construction phase and is secured via Requirement 8 of Schedules 2A and 2B of the draft DCO (REP6-013). Additionally, the Applicants have committed (see CoT11 of Volume 1, Annex 5.3: Commitments register of the ES (document reference REP6-042)) to preparation of detailed Operational Drainage Management Plans which are to be developed in accordance with the outline Operational Drainage Management Plan, the latest relevant guidance and in consultation with the Environment Agency and the Lead Local Flood Authority (being Lancashire County Council). This is secured via Schedule 10, part 10 of the draft DCO (REP6-013).</p>
C1-028-08	<p><b>Conclusion</b></p> <p>All these matters I believe not only render these consultations unfit for purpose but expose this proposal as unviable. At the very least, given the number of issues still outstanding with regard to this application, alongside the already mentioned fact that one of the key partners has withdrawn and not been replaced, surely, if this chaotic cable route project IS to be pursued, a new, widely advertised, resident friendly consultation should be set up as soon as possible during 2026 to enable a genuine, user friendly, balanced, ethical and up to date consultation to take place. This needs to</p>	<p>The Applicants maintain that the project is viable and will enhance the UK's energy security while supporting the delivery of its Net Zero commitments. The Applicants' final position on all matters raised during Examination is set out in the Applicants' Closing Statement (REP7-042), the Applicants' Response to Secretary of State Letter dated 12 March (C1-029.39) and the Applicants Response to Secretary of State's Letter Dated 20 May 2026</p>

Reference	IP submission	Applicants' response
	happen prior to any further decisions pertaining to this application being considered. As the situation currently stands I believe the SOS has no option but to reject the current application.	(S_SoSQ_14) provide the most recent position updates post-examination The Applicants also refer to their response at row C1-007-01 of this submission.

## 2.28 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (C1-030)

**Table 2.29: C1-030 - Lancashire Association of Local Councils Fylde Area Committee Energy Working Group Comments on Responses to the Secretary of State Consultation 1**

Reference	IP submission	Applicants' response
C1-030-01	<p>1. This submission responds to your 12 March 2026 request for information on behalf of the Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG).</p> <p>2. The EWG has engaged extensively in the Planning Inspectorate examination to ensure that this development aligns with the legislative framework and Government objectives of 25 minimizing consumer costs, achieving Net Zero targets, and promoting economic growth.</p> <p>3. The Applicants' letter of 30 January 2026 raises points regarding transmission asset location and routing via the Hillhouse Technology Enterprise Zone (HTEZ) and adjacent National Grid PLC Stanah Substation. From the concept outset and throughout the planning life cycle to date, it has remained entirely possible and appropriate to develop and examine alternative - lower unacceptable harm and higher benefit balance - proposals of the obvious material alternative that includes a route to Penwortham via HTEZ/Stanah, and this remains the case. HTEZ already hosts transmission infrastructure for the Walney 2 offshore wind farm and the adjacent National Grid PLC Stanah substation, which connects with Heysham and Penwortham substations and the wider network. Our submission Rep7-047 (attached) addresses these points in detail, and the Applicants have not provided evidence to refute it.</p>	The Applicants have provided detailed justification as to why the selected route to the National Grid connection point at Penwortham is the most suitable. Please refer to row C1-005-09 of this submission.
C1-030-02	<p>4. The HNDR is clear that its conclusions relied upon the Applicants' joint proposal for a shared cable corridor, a shared single substation and a single export cable, reducing the number of connections and environmental impacts. This has not been delivered in the Applicants' submissions, nor reassessed. The Moor Vannin project proposal, though contemporaneous to the HNDR, was not included in the HNDR and has not been assessed with the Morgan and Morecambe proposals in a coordinated way to ensure that costs are minimised for the consumer and that the proposals are efficient. The proposals do not adopt NESO's advice to Government for Clean Power 2030 to prioritise the reinforcement of existing infrastructure. The construction of three completely independent cable routes, some 30km inland without a consistent comparative assessment of reinforcing the coastal connection infrastructure is in conflict with that advice. The HNDR appears to have ignored the criteria to avoid military airfield activity and so the bird-strike issue and its risk of severe consequences of death and impact on critical national infrastructure in the vicinity continue. Similarly the proposals conflict with land and marine environmental protection zones. The HNDR also does not seem to have recognised the obvious value of utilising the provision of sites to support energy sector development in local development and growth plans, such at the nationally designated Hillhouse Technology Enterprise Zone.i</p>	The Applicants note Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (EWG) wide-ranging criticisms of the HNDR process, however that this remains outwith the scope of the DCO process. The Applicant's also refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14), and specifically the section headed 'Co-ordination and Good Design', which sets out why the site selection conclusions would remain robust for Morecambe proceeding alone.
C1-030-03	<p>5. Since the October 2025 closing statements, the Proposed Development's character has changed: the Morgan element now appears "zombie" in status, while the Morecambe element remains adopting a complex land route for a reduced assured total proposed development output. National Grid's prior assessment overlooked HTEZ/Stanah as a viable site for both Morgan and Morecambe infrastructure &amp; network connectivity, which it now recognizes as eligible (see Rep7-047 Annex 3). Concurrent discussions with NESO and National Grid PLC regarding Orsted Moor Vannin's interest in the benefits of connecting via HTEZ/Stanah, illustrate opportunities to reinforce HTEZ/Stanah, delivering cost, growth, and environmental benefits that the Applicants' current approach fails to realize.t</p>	Please refer to the Applicants response within rows and C1-005-09 and C1-007-08 of this submission. Regarding the Morgan project, please refer to the Applicants responses to paragraphs 32 – 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).
C1-030-04	<p>6. The Applicants have not countered the EWG's evidence demonstrating that the Morgan and Morecambe energy can be delivered in a manner that:</p> <p>a. Complies fully with planning policies, mitigating harms to air, land, and marine environments, including bird-strike risks of death and to critical national infrastructure (e.g. BAE Systems Warton and Westinghouse Springfields), whereas HTEZ/Stanah is outside identified bird-strike risk zones.</p> <p>b. Aligns with NESO's Clean Power 2030 guidance to prioritize reinforcement of existing infrastructure, which is achievable at HTEZ/Stanah.</p> <p>c. Minimizes consumer costs. The Applicants' proposal would incur nearly £1.5bn of avoidable expenditure and costs to consumers across the three windfarm projects due to proposed independent, ~30 km inland cable routes to Penwortham. National Grid PLC (rep1-089) also submitted that Penwortham requires substantial substation upgrades and potential</p>	Please refer to the Applicants response in row C1-030-01.

Reference	IP submission	Applicants' response
	greenbelt compulsory land acquisition. In contrast, coordinating via HTEZ/Stanah would realize significant consumer cost and emissions savings.a	
C1-030-05	<p>7. Your public statements on energy costs and the Clean Energy Economy emphasize growth, Net Zero delivery, and minimising consumer costs. The Applicants' current plan fails on all three, whereas HTEZ/Stanah achieves these objectives.</p> <p>8. As of 11th April, NESO Transmission Entry Capacity registers indicate Morecambe and Morgan are scheduled for June and November 2029 completion and connection to the grid network, respectively. Reinforcing existing infrastructure at HTEZ/Stanah is clearly achievable within this engineering timeframe, with risk and schedule benefits from negating the creation of 90km of undergrounded cable routes.t9. To avoid disadvantaging developers by process constraints, the HTEZ/Stanah could serve as a regulatory sandbox innovation zone, complementing initiatives like Ofgem's Anticipatory Investment Policy (AIP) and National Grid Electricity Transmission Partnership (ETP), facilitating coordinated, cost-effective, and timely development in alignment with government objectives as well as the business cases of developers and investors.h10. Supporting evidence, including the EWG Closing Statement to the Examining Authority (Rep7-047) attached, remains unchallenged. Site visits were invited but not undertaken by the Examining Authority.</p> <p>Conclusion: We invite you to visit HTEZ/Stanah to witness a development solution that aligns with Net Zero targets, fosters local economic growth, and minimizes consumer costs. We urge assessment and implementation of this approach prior to determination. If this is not adopted, the Applicants' 95 proposal presents an imbalance of harms over benefits and should be refused, with the HTEZ/Stanah option as the unassessed Obvious Material Alternative.</p>	Please refer to the Applicants response in row C1-007-08.

## 2.29 Hugh Bruce-Watt, Solicitor for the Affairs of the Duchy of Lancaster (C1-031)

Table 2.30: C1-031 - The Duchy of Lancaster Comments on Responses to the Secretary of State Consultation 1

Reference	SoS point	IP submission	Applicants' response
C1-031-01	45 and 46	<p>References to the draft Order in this letter are to the draft submitted at Deadline 6 (REP6-013).</p> <p>Whilst the Duchy of Lancaster and the Applicants disagree on the interpretation of Section 135 and 227 of the Planning Act 2008 ("the Act"), I write to provide the following consent under section 135(1) and (2) of the Act, in relation to Project B (as defined in the draft Order) to the inclusion of:</p> <ol style="list-style-type: none"> <li>1. the "Fylde and Ribble B Plots" (where the Duchy is the owner of mines and minerals within titles LAN67950 and LAN 48722) within the Order (to the extent such consent is required from the Duchy of Lancaster); and</li> <li>2. the "Savick B Plots" within the Order.</li> </ol> <p>I also write to provide the following consent under section 135(1) and (2) of the Act, in relation to Project A (as defined in the Order) to the inclusion of:</p> <ol style="list-style-type: none"> <li>3. the "Fylde and Ribble A Plots" (where the Duchy is the owner of mines and minerals within titles LAN67950 and LAN 48722) within the Order (to the extent such consent is required from the Duchy of Lancaster); and</li> <li>4. the "Savick A Plots" within the Order.</li> </ol> <p>The above consent pursuant to section 135(1) and (2) provided to Project A and Project B is conditional on Article 39 (Crown Rights) of the draft Order being amended as set out in the Enclosure to this letter.</p> <p>Whilst the Duchy of Lancaster acknowledges that the Book of Reference and powers to be granted by the Order specifically exclude the compulsory acquisition of any interest of the Duchy of Lancaster, for the avoidance of doubt, this letter relates solely to consent pursuant to section 135 of the Act to the inclusion of the above plots. It does not give consent to the acquisition by the Applicants of any interest of the Duchy of Lancaster in relation to the Savick Plots or any other interest of the Duchy of Lancaster within the Order Limits.</p> <p>Such consent shall be provided in the form of a commercial agreement (if terms are agreed), pursuant to the amended Article 39 (Crown Rights) of the Order.</p> <p>The Solicitor for the Affairs of the Duchy of Lancaster, For and behalf of the Duchy of Lancaster</p>	The Applicants note this response.

2.30 Lynda Goupil (C1-032)

Table 2.28: C1-032 - Lynda Goupil Comments on Responses to the Secretary of State Consultation 1

Reference	IP submission	Applicants' response
C1-032-01	<p>Since previously listing my objections regarding what was the Morgan &amp; Morecambe wind farm cable corridor, now possibly the Morecambe windfarm cable corridor, such is the evolution of this wind farm, as Morgan has now seen sense &amp; withdrawn, I now find there are more reasons to query the route of the cable corridor.</p> <p>I now learn both Britain's Ministry of Defence &amp; BAE Warton have raised objections to the plans due to potential interference with their aviation and radar systems at BAE Warton. The MOD actually stated the project would have a 'significant &amp; detrimental impact on the effective operation &amp; capability of the air traffic control radar at Warton.'</p> <p>BAE Warton also now has a contract to supply 20 Eurofighter Typhoon jets with Turkey by 2030, therefore there will also be an increase in flights, due to test flights, increasing the chances of a fatal incident &amp; with the increased flight traffic at Warton there will also be an even greater chance of the potential for a devastating bird strike! Freckleton has already suffered one of these devastating events &amp; is therefore fully aware of the possibility of this happening again!</p>	Please refer to the response within row C1-005-07.
C1-032-02	<p>Photos &amp; scaled models were suggested &amp; promised throughout the consultation period. Photos eventually presented after the end of the consultation period! &amp;, as far as I'm aware, scaled models have never materialised, which, I can only assume, is because of the negative response with which they would have been received amongst local residents.</p>	The Applicants provided visualisations of the proposed onshore substation throughout the examination process, as set out in Volume 3, Annex 10.3: Visual baseline technical report (REP6-052).
C1-032-03	<p>I am still dubious regarding the Sabic TPEP pipeline running north to south beyond the back of St Annes. The objections/queries seem to have been signed off with little reference to the seriousness of a potential disaster if this pipeline was to suffer damage. It was just a statement at the hearings that it had been signed off and no reference or further discussions on the repercussions if it was damaged nor any explanation how they had come to this decision considering the seriousness of a possible disaster, which seemed strange?</p> <p>I have still not seen a detailed response/explanation as to why the cheaper/shorter cable corridor route via Stanah has been dismissed? as this seemed the more sensible route, especially now Morgan has backed out from the project.</p>	<p>The Applicants refer Ms Goupil to SABIC UK Petrochemicals Limited and SABIC Petrochemicals BV removal of objection letter submitted at Deadline 7 (REP7-074). The Applicant and SABIC have agreed protective provisions, which was included in the Applicant's draft DCO submitted at Deadline 6 (REP6-013).</p> <p>Please refer to the Applicants response in row C1-007-08 regarding Stanah.</p>
C1-032-04	<p>Another point which was not referenced at the hearings until I mentioned it with some of the hearing panel members on the last break of the last day of the hearings and which affects me, was a 'change of access' on Leach Lane. It was only when I mentioned it at the hearings because I approached the panel members on the final break of the last day. Few locals who live on Leach Lane were even informed of this change &amp; I only knew because I know someone who lives directly opp this access. I discovered that the site entrance on Squires Gate Lane was to be removed &amp; any access required there was to now use the Leach Lane access, even though most of Leach Lane residents still don't know where the access was to be on Leach Lane. It was only through consulting your panel that I discovered where the access was going &amp; a statement was then made at the hearing. Most on Leach Lane are still unaware where the access is to be nor the fact that there will now be even more industrial traffic, diverted from Squires Gate Lane to access the site, coming along their quiet, local roads!</p> <p>In summary, there is nothing 'green' about wind farms. It is just a money making scam for big business! and big business is not bothered about the little people who's lives they impact in a negative manner nor the wild life nor natural habitats they destroy</p>	The Applicants believe Ms Goupil is referring to the Change Request consultation, which took place from 11 August to 12 September 2025. Ms Goupil submitted feedback to this consultation, to which the Applicants responded. Further information can be found in the Change Request Consultation Feedback Response (REP5-157).

### 3 Applicants' Response to post-examination submissions received from 29 October 2025 to 29 January 2026

Table 3.1: Applicant's response to post-examination submissions received from 29 October 2025 to 29 January 2026

Reference	IP name	IP submission	Applicants' response
PIR-001	Lancashire County Council	Closing statement submission by Lancashire County Council. Full submission not inserted due to length of document.	The Applicants position on these matters at the close of examination is presented in the Applicants Closing Statement (REP7-042). Subsequent updates can also be found in The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39).
PIR-002	Christine Abbott	<p>Applicant submissions at Deadline 6</p> <p>Are we expected to review over 180 extremely lengthy, integral and complex documents in 3 working days? The Applicants Deadline 6 submissions were uploaded onto the Planning Portal on 24th October with End of Examination on the 29th October. With all the will in the world It is near impossible to assess these documents fully and provide an adequate response. If further documents are submitted by the Applicant these will not be able to viewed, examined and/or commented on by parties. This is wholly unacceptable in an Examination process.</p>	The Applicants note Ms Abbott's criticisms of the examination process.
		<p>Examination Timetable Revisions</p> <p>The revision of the timetable as requested by the Applicant are seemingly unjust and lie in the Applicants favour. From commencement of the Examination, many Consultees stated they had limited capacity to respond to deadlines and I believe this limiting factor ought to have been considered during revision of the timetable.</p>	The examination timetable is set by the Examining Authority. This was done in consultation with the Applicants and all Interested Parties via the Rule 6 letter submitted on the 28 March 2025. Any revisions to the examination timetable were done so at the discretion of the Examining Authority.
		<p>Outstanding Issues</p> <p>A large number of critical issues remain unaddressed by the Applicants. These unresolved matters undermine both the integrity of the examination process and the reliability of the Application itself.</p>	The Applicants refer Ms Abbott to the Applicants closing statement (REP7-042) and subsequently to The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39) on progress of outstanding matters.
		<p>Inadequate Environmental Assessment (EA)</p> <p>The EA contains serious and material gaps. The project has not been sufficiently assessed, appraised, or mitigated to enable an informed decision.</p>	The Applicants have prepared a comprehensive Environmental Impact Assessment and management plans as part of the application, which is intended to identify, assess, and ensure that potential effects on wildlife and the wider environment are appropriately addressed, mitigated, and, where possible, avoided or reduced.
		<p>Landscape</p> <p>The development would (a) significantly degrade the quality of the local landscape and have a significant adverse impact on local landscape character. (b) The development would not contribute positively to the maintenance and enhancement of local character, identity and distinctiveness. (c) The development would not protect or enhance a valued landscape. (d) The introduction of new huge substations would bring further impacts to the visual characteristics of the area. This is considered to result in harm to its character and the Application should be refused as such.</p>	Please refer to the response within row C1-007-24 in section 2 of this document.
		<p>Connection Security</p> <p>Recent discussions between Fylde Borough Council and Ofgem indicate that the Penwortham connection offer assumes completion by 2030—an unachievable timeline. This contradicts the Applicants' request for a seven-year commencement window (to 2033), with a three-year construction period potentially extending completion to 2036, excluding delays. The primary reason for rejecting Stanah—insufficient time for network upgrades—lacks credibility given the 11-year window to 2036. Other justifications also fail: Stanah is not fully encircled by residential development (adjacent on two sides at most; see Ordnance Survey extract in the Statement of Benefits and Harms); Environmental impacts would be markedly lower than the Penwortham route: a 2 km cable corridor versus 30 km, with substations in an industrial zone rather than a sensitive rural residential area.</p>	National Grid has confirmed in its response to Examining Authority questions (REP3-088) that the alternative Point of Interconnection at Stanah is not possible. It is also notable that the proposed East Irish Sea Transmission Project has a recently provided connection at Penwortham, not Stanah, further highlighting the unsuitability of this connection point. The Applicants have provided detailed justification as to why the selected route to the National Grid connection point at Penwortham is the most suitable and note that none of the alternative routes suggested would meet the established site selection criteria set out in APP-033.

Reference	IP name	IP submission	Applicants' response
		<p><b>Biodiversity Net Gain</b></p> <p>The Applicants' Biodiversity 'Benefit' Supporting Statement (REP5-145, Table 3, pp. 15–16) confirms a net biodiversity loss. Public authorities must consider actions to conserve and enhance biodiversity under s.40 of the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021). Approving a project that fails to conserve biodiversity contravenes this duty. Natural England (REP6-190, Q4) warns that drilling less than 15 m below Lytham Beach dunes risks impacts on Ground Water Dependent Terrestrial Ecosystems. As the Applicants classify these dunes as irreplaceable habitat (e.g., REP5-151), and would be drilling c10m, this constitutes a further biodiversity breach.</p>	<p>Please refer to section 1.9 of The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39) Biodiversity Net Gain</p>
		<p><b>Bird strike</b></p> <p>The unresolved risk of increased bird strikes at Blackpool Airport and BAE persists, despite an agreement with Blackpool Airport's owners. This This issue ought to have been considered much earlier in the Examination process. I strongly urge that The Secretary of State considers carefully the overwhelming evidence to refrain from approving this Application.</p>	<p>Please refer to the response within row C1-005-07 in section 2 of this document.</p>
PIR-003	Ministry of Defence (MOD)	<p>This letter updates the Ministry of Defence (MOD) Safeguarding position with regard to the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets. A letter, dated 20 May 2025, setting out the MOD position was provided to the Examining Authority, which was subsequently updated by letters dated 22 September 2025 (in response to the Examining Authority's ExQ2 &amp; commentary and questions on the draft development consent order) and 22 October 2025 (in response to Action Points arising from issue specific hearing 4). A Statement of Common Ground (SoCG) has been prepared in conjunction with both the Applicants and BAE Systems Warton; that SoCG was signed 31 October 2025.</p> <p>This letter addresses outstanding issues only which relate to the proposed development as situated within the boundaries of the statutory birdstrike safeguarding zone for Warton Aerodrome and the impact of the proposed environmental mitigation works and biodiversity benefit sites and will focus on the MOD maintained objection on the grounds that the development in its currently proposed form specifically the environmental mitigation area proposals at Newton-with-Scales has the potential to degrade aviation safety by creating or enhancing environments that would attract or support populations of large or flocking bird species. This is particularly relevant to the Applicants' proposed wording of Requirement 27 within Schedule 2A and Schedule 2B of the draft Development Consent Order.</p> <p>Birdstrike MOD acknowledge that the Applicants, BAE Systems, and MOD have made efforts to work collaboratively to identify realistic and pragmatic solutions. There are a number of Works within the proposed Onshore Transmission Assets which have the capacity to impact on the operation and capability of Warton Aerodrome. In responding to consultation, MOD has sought to identify those elements and worked with the Applicants and BAE Systems to find means to address/mitigate those potential impacts. MOD note that the Applicants have submitted documents intended to ensure that the development does not result in the creation or enhancement of environments that might attract hazardous bird species within the statutory safeguarding zone drawn to preserve aviation safety at Warton Aerodrome.</p> <p>MOD has reviewed the most recently submitted Outline Wildlife Hazard Management Plan (Doc. Ref. S_D3_8/F03 dated 22 October 2025), specifically the measures and activities detailed in Appendix A 'Wildlife Attractants Habitat Risk', and this assessment has concluded that the MOD objection on the grounds of the potential for increased risk of birdstrike must be maintained.</p> <p>Work Numbers 49A (Morgan permanent environmental mitigation works including permanent access) and 49B (Morecambe permanent environmental mitigation works including permanent access) relate to proposed works covering a variety of sites. These works at Newton-with-Scales involve the enhancement and restoration of existing habitat features to provide replacement habitat for non breeding and breeding terrestrial waterbirds and farmland birds displaced by the permanent loss of habitat at the sites where the onshore substations will be located. Amongst the environmental measures and activities to be undertaken at Newton-with-Scales the Applicants propose the creation of permanent scrapes, management water levels within existing ditches, stopping up hedgerows and the creation of a mosaic of grassland.</p> <p>The site at Newton-with-Scales is located slightly north of Warton Aerodrome, to the south of the site is the Ribble Estuary. Given the location of the site and the Applicants' proposed enhancement of the habitat for Golden Plover,</p>	<p>The Applicants have addressed the points raised by Secretary of State for Defence in The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39) and The Applicants Response to Secretary of State Letter and Request for Information 2 (S_SoSQ_14).</p>

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		<p>Teal, Black-tailed Godwit, other terrestrial waders such as Lapwing and Curlew, and waterfowl such as Wigeon (though the environmental mitigation proposals would also benefit breeding farmland birds such as Corn Bunting, Grey Partridge and Tree Sparrow) there is particular concern that movements of flocking hazardous birds, such as waders and waterfowl, to and from the Ribble Estuary to the south will take them through, and across, operational airspace which includes both the approach and take-off/climb airspace associated with runway 25 / 07. The introduction of these bird species which are hazardous to the safety of aircraft has the capacity to increase the potential for birdstrike to the detriment of aviation safety.</p> <p>MOD has provided feedback to the Applicants advising that the environmental mitigation proposals, for the implementation of habitat enhancement measures to mitigate potential impacts of temporary and permanent habitat loss associated with each of the onshore substations, are not appropriate at the Newton-with-Scales location. The species targeted by these proposals include Golden Plover, Teal, Black-tailed Godwit, other terrestrial waders such as Lapwing and Curlew, waterfowl such as Wigeon, and breeding farmland birds such as Corn Bunting, Grey Partridge and Tree Sparrow. The primary objective of the mitigation area is to provide permanent alternative habitat for non-breeding Golden Plover due to the permanent habitat loss at the onshore substation sites. Golden Plover form very dense flocks, and movements of these flocks around the area to the east of Warton Aerodrome will have a significant impact on birdstrike risk with this species (flocking species result in a higher probability of damage to the aircraft if struck due to the increased chance of multiple strikes in the same incident).</p> <p>During discussions MOD has advised that use of the Newton-with-Scales site for the species identified is problematic. If it is necessary to provide habitat for these species it would be more expedient and/or judicious to provide it on a site south of Warton Aerodrome, ideally to the south of the estuary. If mitigation must be undertaken at the Newton-with-Scales site it should target less potentially hazardous species such as Corn Bunting and Grey Partridge and be designed to deter larger more hazardous species especially wintering waders and waterfowl.</p> <p>The MOD is advised that any effective management plan to mitigate the potential birdstrike risk associated with the proposed environmental enhancements would be, by design, required to target those species for which the Applicants seek to provide a replacement habitat. 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.</p> <p>Schedule 2A Requirement 27 and Schedule 2B Requirement 27</p> <p>MOD acknowledge that the Applicants have made provision within their draft Development Consent Order (Document ref. C1/F09, Revision. F09, dated 22 October 2025) for a mechanism through which a detailed Wildlife Hazard Management Plan may be submitted for approval and, subject to receiving that approval, works may begin subject to implementation of those measures/actions set out in the approved Wildlife Hazard Management Plan. That requirement is set out at Schedule 2A, Requirement 27 and Schedule 2B, Requirement 27. The wording of each of those requirements makes specific reference to an Outline Wildlife Hazard Management Plan, and as the detailed WHMP is required to be in accordance with the Outline Wildlife Hazard Management Plan the contents of which, as previously detailed, have not been agreed or deemed acceptable it is not possible for MOD to agree the wording of either Requirement. I trust this adequately explains the updated MOD position in regard of this proposed development.</p>	
PIR-004	Gordon Ashworth, Christine Ashworth, Katherine Fare	<p>My wife and I have taken careful consideration in preparing both verbal and written submissions to the Planning Inspectorate examination. We have abided by the timescales and deadlines defined to satisfy DL6 and DL7 targets of 24<sup>th</sup> October and 29<sup>th</sup> October accordingly. We understand that we can make no further contribution after these dates that can be incorporated into the final documents as of the 29<sup>th</sup> of October, however, Dalcour Maclaren on behalf of M&amp;M are now offering us all, option incentive payment terms with the cut-off date now being moved to the 19<sup>th</sup> December 2025. The above criteria's also relate to my wife's sister Kathryn Fare who lives in a linked property to ours, also a land owner stakeholder, holds the same principals and concerns as ourselves and is a joint signature of this letter. We note that during this period Mr John Wheadon, Head of Energy Infrastructure Planning &amp; Innovation, on behalf of the Secretary of State for Energy Security and Net Zero issued a request for information extending the decision date for the Morecambe Offshore Windfarm Ltd from 23<sup>rd</sup> October to 19<sup>th</sup> December, 2025. On this letter, as attached, there is no mention of this extension applying to the Morgan and Morecambe Transmission Assets schedule. In fact the formal documentation timescales remain the same as stated in the official website M&amp;M</p>	<p>We do not accept the suggestion that the Applicants improperly used the extension to the Morecambe Offshore Windfarm Generation Assets application to progress land negotiations.</p> <p>The close of examination does not prevent the Applicants from continuing discussions with affected landowners and stakeholders to resolve outstanding matters as far as reasonably possible.</p> <p>Such engagement should not be characterised as an abuse of process or a breach of planning legislation.</p>

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		<p>Transmission Assets However, as you can see from the two further letters attached the applicants are using the Morecambe OWL extension to progress their activities further with respect to the Morgan &amp; Morecambe Transmission Asset stakeholders. It is our understanding this should not be the case and that all such applicant activity should have ceased on 29<sup>th</sup> October. The applicants appear to be exploiting this situation to harass/bully my wife and I to agree to a land transaction we have no intention of making. Their behaviour oozes sharp practice conducting such activist engagements whilst the Planning Inspectorate are considering their final decision. We believe the applicants are not conducting themselves in the spirit of the planning process laws and are at best abusing their position, at worst breaching planning legislation, namely Planning Act 2008: Guidance on Changes to Development Consent Orders and The Infrastructure Planning (Change to, and Revocation of. Development Consent Orders) Regulation 2011.</p> <p>We would appreciate you urgently reviewing this situation and advise us accordingly.</p>	
PIR-005	Addleshaw Goggard LLP on behalf of National Grid Electricity Transmission plc (NGET)	We act on behalf of National Grid Electricity Transmission plc (NGET) in relation to its role as an Interested Party in the Morgan and Morecambe Offshore Wind Farms Transmission Assets Project. By way of an update, NGET has now reached an agreed position with Morgan Offshore Wind Limited in relation to the interactions between its part of the wider Project and NGET's apparatus and interests and has completed a confidential side agreement confirming that position. NGET has also reached an agreed position with Morecambe Offshore Wind Limited, subject to completion of a confidential side agreement. This is anticipated to follow early in the new year, following the winter holiday season. NGET cannot withdraw its objection until both agreements are completed and will update the Examining Authority once this position is reached.	The Applicants note this response.
PIR-006	Addleshaw Goggard LLP on behalf of National Grid Electricity Transmission plc (NGET)	Further to correspondence below, I can confirm that NGET has now reached an agreed position with both Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited and as a result of that agreement NGET wishes to withdraw its objection to the Order. NGET notes that its preferred protective provisions were included in the Deadline 6 version of the DCO. I would be grateful if you could please confirm safe receipt.	The Applicants note this response.
PIR-007	Birketts LLP on behalf of GTC Pipelines Limited	We act for our above named Client in connection with the DCO Application. Our Client has voluntarily entered into an Agreement dated 21 October 2025 made between (1) Morgan Offshore Wind Limited and (2) our Client and an Agreement dated 17 December 2025 made between (1) Morecambe Offshore Windfarm Ltd and (2) our Client. In pursuance of those Agreements, our Client wishes to withdraw its representation submitted on 6 January 2025. Please kindly acknowledge receipt of this correspondence and withdrawal of our Client's representations A copy of this letter has been sent to the solicitors acting for Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd	The Applicants note this response.
PIR-008	Eversheds Sutherland (International) LLP on behalf of Network Rail Infrastructure Limited	We are instructed by Network Rail Infrastructure Limited ("Network Rail") in relation to the Morgan Offshore Wind Project and Morecambe Offshore Windfarm: Transmission Assets Order 202[] ("the Order"). We write further to Network Rail's Relevant Representation in March 2025 which set out Network Rail's grounds of objection to the Order. Network Rail has now entered into respective Framework Agreements with the Morgan Offshore Wind Project and Morecambe Offshore Windfarm: Transmission Assets Order 202[] (both were completed 18 December 2025) which appends Network Rail's Protective Provisions, addressing Network Rail's concerns. Accordingly, we write to confirm that Network Rail's representation is hereby withdrawn.	The Applicants note this response.
PIR-009	Walker Morris LLP on behalf of Fylde Borough Council	Full submission not inserted due to length of document (total of 141 pages including appendices).	The Applicants have addressed the points raised by Fylde Borough Council in section 2 of this document, The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39) and The Applicants Response to Secretary of State Letter and Request for Information 2 (S SoSQ 14).
DR-001	Lancashire County Council	I am writing as Chief Executive of Lancashire County Council to inform you that the county council, at a meeting on 20 November 2025. Approved a resolution regarding the Morgan and Morecambe Offshore Windfarm. In particular, Full Council asked that I write to you, and all affected MPs, setting out our willingness to work with you and the developer to deliver the urgent action needed to avoid the adverse impacts and realise the opportunities that proper	National Grid has confirmed in its response to Examining Authority questions (REP3-088) that the alternative Point of Interconnection at Stanah is not possible. It is also notable that the proposed East Irish Sea Transmission Project has a

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		<p>assessment of the alternative routing options could deliver, and also to facilitate these discussions for the benefit of all.</p> <p>Please find enclosed a copy of the council's resolution in full, for your reference.</p> <p>Notice of Motion approved by Lancashire County Council on 20 November 2025:</p> <p>The proposed onshore cabling route for the Morgan and Morecambe Offshore Windfarm through Lancashire will cause major disruption and harm to residents, businesses, tourism, farmland and the environment. Concerns have been raised by local councils, community groups and residents about the scale and duration of works; damage and safety risks from heavy construction traffic; harm to landscapes and wildlife habitats; disturbance to St Annes beach affecting the coastal environment; and the planned construction of new substations in rural Fylde permanently altering its character and agricultural use. There are also concerns that the developer has deviated from the assumptions that the Holistic Network Design relied on. The developer has not, in the view of many residents, fully explored less harmful routes, siting options or technical solutions. As a result, consumers and investors could be faced with additional costs without any additional benefits. Council therefore resolves to instruct the Chief Executive to write to the Secretary of State for Energy Security and Net Zero, and all affected MPs, setting out our willingness to work with them and the developer to deliver the urgent action needed to avoid the adverse impacts and realise the opportunities that proper assessment of the alternative routing options could deliver, and also to facilitate these discussions for the benefit of all.</p>	<p>recently provided connection at Penwortham, not Stanah, further highlighting the unsuitability of this connection point. The Applicants have provided detailed justification as to why the selected route to the National Grid connection point at Penwortham is the most suitable and note that none of the alternative routes suggested would meet the established site selection criteria set out in APP-033. The Applicants also refer to their response to paragraph 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>
DR-002	David Walton	<p>I write to raise concerns about the planned cable route for the wind farm extension (EN020032).</p> <p>Issue</p> <ul style="list-style-type: none"> <li>* The proposed route will cause extensive disruption - like a bull in a china shop.</li> </ul> <p>Suggested Alternatives</p> <ul style="list-style-type: none"> <li>* A better option would be to use an existing route nearer Fleetwood along the river shore.</li> <li>* Or consider an alternative route along the edge of the river Ribble, where one could replace or enhance the flood barriers without much disruption along the way. I believe the birds or mussels will return once the project is complete.</li> </ul> <p>Additional Proposal</p> <ul style="list-style-type: none"> <li>* Please consider funding/designing a home wind turbine solution which could be sited in people's gardens or bolted to the side of houses.</li> <li>* Connect such turbines to a household battery and the consumer unit.</li> <li>* This could be developed in liaison with e.g. the Institute of Physics, to allow homeowners to generate some of their own electricity and reduce the need for a huge cable upgrade. Thank you for considering these alternatives. Yours sincerely,</li> </ul>	<p>The Applicants have prepared a comprehensive Environmental Impact Assessment and management plans as part of the application, which is intended to identify, assess, and ensure that potential effects on wildlife and the wider environment are appropriately addressed, mitigated, and, where possible, avoided or reduced.</p> <p>The Applicants have provided detailed justification as to why the selected route to the National Grid connection point at Penwortham is the most suitable and note that none of the alternative routes suggested would meet the established site selection criteria set out in APP-033.</p> <p>In respect of the 'Additional Proposal', the Applicants have no comments, as it does not form part of the present application."</p> <p>The Applicants also refer to their response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (S_SoSQ_14).</p>