



TLT LLP
20 Gresham Street
London EC2V 7JE
T +44 (0)333 006 0000
[REDACTED]

Our ref 308S/AW67/124653/000002
Your ref EN020032

SoS DESNZ c/o John Wheadon
3 Whitehall Place
LONDON
SW1A 2AW

By email

Direct tel	+443330 [REDACTED]	Date	20 July 2026
Direct fax	+443330 [REDACTED]	Email	[REDACTED]@TLT.com

Dear Secretary of State

**Morgan and Morecambe Onshore Transmission Assets DCO application
First response to third (8 July 2026) request for information**

Introduction

1. This is a first response to the Secretary of State's third (8 July 2026) request for information on behalf of Newton-with-Clifton and Freckleton Parish Councils, for whom TLT acts.
2. This response covers the three issues on which comment is sought by 22 July 2026, although it is noted that the Parish Councils are not specifically requested to respond. Although the request is restricted to three areas, the other unresolved issues upon which the Parish Councils have made representations remain unresolved:
 - a. the granting of powers to construct the Morgan project effectively to persons unknown with no attendant compulsory acquisition or temporary possession powers;
 - b. the Applicants having given the airports the final say on the conflict between environmental impacts and bird strike risk, whether there is sufficient confidence that adequate environmental mitigation will be provided given that it has already been diluted from 'enhance' to 'maintain' and may further be diluted at the behest of the airport operators due to continuing bird strike concerns;
 - c. the visual impacts of the substation(s) remaining significant and the Applicants' proposals to mitigate these further (C1-029.39, paragraphs 1.6.2.22-31) remaining unsecured;
 - d. the significant biodiversity net loss that would occur if the project were consented as proposed when all other recent projects have achieved a gain close to or exceeding the 10% figure that is due to become mandatory;



- e. the lack of progress on a s106 agreement with Fylde Borough Council meaning the mitigation it would contain remains unsecured;
 - f. the rationality of granting consent for a project that could be achieved at much lower cost and impact.
3. The Parish Councils continue to press for these significant issues to be resolved, and to maintain that the application should be refused if the issues remain unresolved at the time the decision is made.

Paragraph 7

4. The Parish Councils have made enquiries locally and have not been advised that any further negotiations on land powers have taken place.

Paragraph 8

5. The Parish Councils are encouraged by the implication that if the application is to be consented it will not contain compulsory acquisition or temporary possession powers for land just to be used for the Morgan assets.
6. According to section 1.10 of the Statement of Reasons ([C1-029.19](#)), this presumably means that all parcels containing the letter 'A' should be removed from all documentation (plus any without that designation but listed only for Morgan, e.g. 16-029ii), and any parcels without an 'A' or 'B' that are only subject to temporary possession for Morecambe should be reduced to that power where greater powers are currently sought (e.g. parcel 05-052).
7. If compulsory acquisition and temporary possession powers are removed for Morgan-only development, particularly in the light of land negotiations not progressing or at least not having concluded, should powers to construct Project A (i.e. Morgan) be granted at all when they do not have an identified promoter and will face significant additional hurdles with implementation due to lack of land access?

Paragraphs 9-12

8. The Parish Councils do not understand the first sentence of paragraph 10, which seems to be suggesting that if it is merely feasible that temporary disturbance effects can be sufficiently avoided via scenario 3, then the Applicants should remove their proposed mitigation for those effects from the project via scenarios 1 and 2. 'Feasibility' is far too low a threshold to justify abandoning back-up mitigation proposals if effects do in fact occur. Planning practice guidance on appropriate assessment (reference ID: 65-003-20190722) states (emphasis added):

*"a competent authority is permitted to grant a plan or project consent which leaves the applicant free to determine subsequently certain parameters relating to the construction phase, only if that authority is **certain** that the consent includes conditions that are strict enough to **guarantee** that those parameters will not adversely affect the integrity of the site"*

9. Only adopting one set of measures on the basis that it is feasible and dropping others clearly falls short of guaranteeing no adverse effect on integrity.

Paragraph 13

10. The Parish Councils will respond to paragraph 13 by the second deadline of 7 August, and if there is time, will also respond to published submissions received by the first deadline.



Other information

East Irish Sea Transmission Project

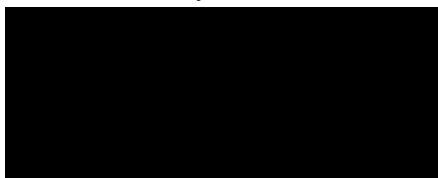
11. The Parish Councils note that the Mooir Vannin wind farm is currently undergoing examination by an Examining Body appointed by the Isle of Man government, due to complete on 9 September. The part of the project in UK waters is the East Irish Sea Transmission Assets project (EN0210008) which remains in pre-application. However, on 16 December 2025 the applicant for that project, Ørsted, which has a Penwortham connection agreement, confirmed its preferred onshore cable route to be at Fleetwood¹ (extract at Appendix 1).
12. This underlines the feasibility of the (Morgan and) Morecambe project also using this landfall, and routing via Stanah to Penwortham.

Bluefield solar farm

13. The Parish Councils note that the proposed 32ha 28MW Grange Farm Solar Farm planning application made by Bluefield Renewable Developments Ltd (reference 24/0541) is due to be considered by the Fylde Borough Council planning committee on 2 September 2026. Its red line boundary is immediately adjacent to the order limits across Dow Brook west of Parrox Lane (see approximate overlay at Appendix 2).
14. There are acknowledged to be cumulative visual impacts but not transport impacts because (to quote the Bluefield highways technical note):

"it is understood that the earliest start date for the DCO scheme is likely to be 2027. In contrast, the proposed solar farm is expected to be determined in Autumn 2025. Subject to the timely discharge of pre-commencement conditions, construction could reasonably be expected to begin in spring 2026 and be completed within approximately six months, with the site operating before the end of 2026. Accordingly, it is considered highly unlikely that there will be an overlap in construction activity between the solar farm and the DCO project."
15. Given that the solar farm is now a year late it is now quite likely that their construction phases will overlap. The cumulative impact of constructing two large projects on country lanes such as Lower Lane should be properly assessed and mitigation proposed.

Yours sincerely



Partner
for TLT LLP

¹ [Ørsted confirms preferred cable route for East Irish Sea Transmission Project](#)



APPENDIX 1 – EXTRACT OF ØRSTED PRESS RELEASE

16.12.2025 12:00

Orsted confirms preferred cable route for East Irish Sea Transmission Project

Ørsted, a global leader in offshore wind, has confirmed its preferred onshore cable route for the East Irish Sea Transmission Project, which will bring secure renewable energy from the Mooir Vannin Offshore Wind Farm in the Isle of Man's territorial waters to the UK.

Following extensive early engagement with communities across the proposed cable route search area, Ørsted has taken the decision to progress an application for a landfall at Fleetwood. As a result, the previously proposed southern landfall at Sefton will no longer be pursued.

This decision reflects detailed environmental, technical, commercial and planning assessments, alongside the valuable feedback received during seven local information events held in September 2025, which were attended by more than 550 residents.

Once operational, the majority of the electricity generated by the wind farm – enough of power more than 1.4 million homes – will be supplied to the UK grid. Up to 100MW could also be supplied to the Isle of Man to help meet the Island's net zero and energy security goals.

