



# **MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS**

**Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 2**



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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).                                                                                                                                                                                                                                     |

| Term                                                          | Meaning                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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.<br><br>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              | <p>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.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>                                                                                                                                                                                                                       |
| Transmission Assets Order Limits: Onshore               | <p>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).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>                                                                                                                                                                                     |

## 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 2

## 1.1 Introduction

- 1.1.1.1 Following Secretary of State Consultation 2, 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. C3-002-1, C3-002-2, etc. Where appropriate, the relevant Secretary of Statement question number has also been included for submissions in response to the Secretary of State's letter.

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

### 2.1 Steve Hunter (C2-002)

Table 2.1: C2-002- Steve Hunter Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-002    | <p>I can only suggest from a personal point of view the damage it would create to habitat farmland businesses tourism dangers to aircraft from bird strikes and people are worried over even more flooding than occurs wouldn't like to estimate how many hundreds of tons of concrete are going to be poured into our beautiful countryside not outstanding on the above complaints I am extremely worried over the emittance of the amount of decibals these 2 substations will emit constantly 24 hrs per day I myself am certainly not against wind farms and recognise the need for them but when you have an alternative in this instance in the enterprise project at hillhouse Thornton that offers a much more sensible option hardly any disruption to land and people's jobs and livelihoods and a really significantly cheaper project to who it may concern I trust you acknowledge my email and register my strong opposition to the cable route of 30 kms and siting of the substations thank you with regards Steve hunter resident of freckleton village</p> | <p>The Applicants have previously addressed these matters throughout examination. The Applicants would direct Mr Hunter to the following documents:</p> <ul style="list-style-type: none"><li>• Farm holdings and other businesses - Applicants Closing Statement (REP7-042) – Section 10.2.4</li><li>• Tourism - Applicants Closing Statement (REP7-042) – Section 14.2</li><li>• Bird strike – Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), Section 1.3, and to BAE's response (C2-027) for their latest position.</li><li>• Flooding - Applicants Closing Statement (REP7-042) – Section 7</li><li>• Operational noise - Applicants Closing Statement (REP7-042) – Section 12, and Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3) within row C1-005-04</li><li>• Alternative route/ connection point - Applicants Closing Statement (REP7-042) – Section 2.2.</li></ul> |

### 2.2 Trevor Enstone (C2-003)

Table 2.2: C2-003: Trevor Enstone Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-003    | <p>As you are aware Morgan &amp; Morecambe Offshore Wind farms have withdrawn from this project. This of course has made a significant reduction in the compensation i will receive. The land has already become worthless !!!!</p> <p>For a second time i am requesting that the now single pipeline be moved over the the side of my land fronting XX rather than it goes through the middle of the plot of land.</p> <p>I only signed the agreement on the basis of the compensation i was originally informed i would receive.</p> <p>Surely the original agreement must be now void.</p> <p>I trust you can look at my request favorable with applying "common sense".</p> | <p>The Applicant acknowledges Mr Enstone's concerns and spoke with Mr Enstone on the 8 July 2026, where the structure of the agreement and the status of the project were discussed. Throughout the negotiation process, compensation attributable to the individual project elements was clearly distinguished and communicated, ensuring that landowners were fully informed of the basis upon which compensation would be assessed and payable should any particular element proceed, be modified, or not be taken forward.</p> <p>The most up-to-date position regarding the Morgan Project is set out in paragraphs 31–35 of the Secretary of State's letter dated 20 May 2026 (C2-029.2), together with The Crown Estate's response to the Secretary of State (C2-026 and C3-006).</p> |

### 2.3 Keith Rawlinson (C2-004)

Table 2.3: C2-004: Keith Rawlinson Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                  | Applicants' response                                                                                                               |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| C2-004    | <p>Under the Wildlife and Countryside Act of 1981, it is illegal for you to damage the beach and sand dunes at Starr Gate and I will be seeking litigation to prevent such an outrage taking place. Further, if the bulldozers attempt such willful and illegal destruction, I have no doubt that the public response will forthright and determined to stop this illegality taking place.</p> | <p>Please refer to Section 2.3.2 of Applicants Closing Statement (REP7-042), which confirms no damage to the dunes will occur.</p> |

## 2.4 B D Glistner (C2-005)

**Table 2.4: C2-005 - B D Glistner Comments on Responses to the Secretary of State Consultation 1**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-005    | <p>I am writing to object to the proposal of disrupting Starr Gate Sand dunes etc to enable the pipeline to come in for the windfarm, which would affect the sand dunes which are protected by law.</p> <p>I live in XX. I am dreading all the noise and disruption this will cause, which will greatly affect the rest of my life, when I should be enjoying XX.</p> <p>Why, can't it go through Stannah at Thornton Cleveleys, who have said they would welcome this and it would cause minimal destruction or disruption?</p> <p>It would also affect the property prices in our area.</p> | <p>Please refer to the Applicants response within row C2-004 of this document regarding potential disruption to the dunes.</p> <p>With regards to the alternative connection point, please refer to the Applicants Closing Statement (REP7-042) – Section 2.2.</p> <p>For the Applicants latest position on noise and vibration, please refer to the Applicants Closing Statement (REP7-042) – Section 12.</p> <p>The Applicants have previously addressed concerns regarding property prices. Please refer to Section 2.27 of The Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</p> |

## 2.5 Margaret Barbour (C2-006)

**Table 2.5: C2-006 - Margaret Barbour Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-006    | <p>I am writing to object to the proposal of disrupting Starr Gate Sand dunes etc to enable the pipeline to come in for the windfarm, which would affect the sand dunes which are protected by law.</p> <p>I have lived at Starr Gate for XX years, XX. Any undue stress will have a detrimental affect to my ongoing health concerns, and any chance of experiencing quality of life, will be non existent. I XX spend most of my time at home, the magnitude of the consequences to myself as a result of the disruption this will create is unbearable to think about.</p> <p>I am aware that there are other proposals which would be welcomed for the site so these surely should be considered?</p> <p>I cannot express how fearful I am of this situation, I am sure I will not be alone with these fears.</p> | <p>Please refer to the Applicants response within row C2-004 of this document regarding the sand dunes.</p> <p>The Applicants acknowledge Mrs Barbour's concerns regarding human health and wish to emphasise that this is a matter the Applicants take seriously. Please refer to Section 14.2.4 of the Applicants Closing Statement (REP7-042).</p> <p>In terms of alternative routes, please refer to Applicants Closing Statement (REP7-042) – Section 2.2.</p> |

## 2.6 Newton-with-Clifton and Freckleton Parish Councils (C2-007)

**Table 2.6: C2-007 - Newton-with-Clifton and Freckleton Parish Councils Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| C2-007-01 | <p>1. This is a response to the Secretary of State's second (20 May 2026) request for information on behalf of Newton-with-Clifton and Freckleton Parish Councils, for whom TLT acts.</p> <p>2. From the submissions made by the Applicants and others to the first request for information and the extent of the questions contained in the second request for information it is clear that no issues have been resolved since the first request was made and the number of outstanding issues is increasing, given that agreements (e.g. with Blackpool Airport) have been exited and the Secretary of State is asking for alternative mitigation solutions (paragraph 19(b)).</p> <p>3. Even eight months after the examination ended the key issue of compensating for impacts on an internationally significant site without increasing bird strike risk at two aerodromes remains unresolved and indeed in our submission is incapable of being resolved within the scope of the current application.</p> <p>4. The Parish Councils maintain that the application should be refused unless all of these significant issues are resolved before a decision is made. Each unresolved issue represents one or more adverse impacts of the project. Taken together, those impacts significantly outweigh the project's benefits, particularly as those benefits are now over 75% lower than at the time of the application because the Morgan offshore windfarm is no longer being taken forward (480MW of generation rather than 1980MW).</p> | <p>The Applicants note that the matters raised by the Parish Councils have been addressed in the Applicants' Closing Statement (REP7-042).</p> <p>With regard to compulsory acquisition powers for Morgan and the Parish Councils' characterisation of project benefits, the Applicants refer to Section 1.6.2 of C2-029.2 and for the project benefits the Applicants would specifically refer to the Section headed 'Co-ordination and Good Design'.</p> <p>Regarding bird strike, please refer to row C2-007-01 below.</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|           | <p>5. As previously stated, 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, and it would be unusual to grant consent to build part of a project for which no land rights existed.</p> <p>6. If the project had just been for the Morecambe elements or the Applicants had not omitted to take the proximity of Blackpool Airport and Warton Aerodrome into account in site selection it would have been elsewhere, never mind that an alternative does obviously exist that has now been costed by three local authorities as over half a billion pounds cheaper.</p>                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| C2-007-02 | With regard to the irresolvable conflict between promoting wildlife in general and birds in particular, and the need to avoid more risk of birdstrike. We note the Applicants' continuing convoluted attempts to prove that not one more bird than agreed would be at both Newton-with-Scales and Lytham Moss. This is simply unachievable and would be impossible to regulate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), the Applicants' Response to the Secretary of State's Consultation 3 (C3-008.11), as well as BAE's response (C2-027) for their latest position.                                                                                                                                                                     |
| C2-007-03 | We also note that the Applicants do not accept Natural England's view that the Newton-with-Scales site is the only viable option for a permanent area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Please refer to Natural England's response to the Secretary of State's Consultation 3 (C3-005). The Applicants have set out revised mitigation measures at land south of Newton-with-Scales and an alternative permanent mitigation at Lytham Moss in the updated Outline Ecological Management Plan (oEMP) (C2-029.16).                                                                                                                    |
| C2-007-04 | It is disappointing that the Secretary of State, in referring the Applicants to the Fylde BC and Lancashire CC submissions only, has resulted in the Applicants not addressing the points raised by the Parish Councils previously. These included the continued failure, despite promises during the hearings, to provide renderings to allow local communities to judge the understand the visual impact of the two substations, and how any proposed mitigation, such as the mistitled "community led off site planting", would change that impact.                                                                                                                                                                                                                                                                                                                                                                                                      | Please refer to the Applicants response within rows C1-007-24 and C1-007-25 in the Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3).                                                                                                                                                                                                                                                 |
| C2-007-05 | Also of concern is the reference to the use of the limited Community Benefits Fund. The consultation on this Fund was only for the smaller Morecambe proposal, and covered a substantial area well beyond the immediate scope of the route and substations including Poulton-le-Fylde in Wyre. Diverting this fund into works that should be provided by the applicant will further dilute the impact of the fund away from its intended use for impacted local communities around the substations.                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Please refer to paragraphs 1.5.1.25 to 1.5.1.28 in the Statement of Reasons (REP6-018).                                                                                                                                                                                                                                                                                                                                                     |
| C2-007-06 | We maintain our opposition to the proposed working hours, which will impact on local communities, businesses and schools. Shorter hours would reduce that impact.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Please refer to Section 1.7 in the Applicants response to Secretary of State letter dated 12 March 2026 (C1-029.39).                                                                                                                                                                                                                                                                                                                        |
| C2-007-07 | We note the Applicants failure to agree the Secretary of State's approach to Biodiversity Net Gain as the latest in their attempts to avoid responsibility for meeting the Government's ambitions for Biodiversity Net Gain.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Please refer to Section 1.9 in the Applicants response to Secretary of State letter dated 12 March 2026 (C1-029.39).                                                                                                                                                                                                                                                                                                                        |
| C2-007-08 | We compare the rather rosy picture painted of progress with landowners at points 37-42, with the more sombre reality set out below in paragraph 14.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The Applicants note this response and have no further comment.                                                                                                                                                                                                                                                                                                                                                                              |
| C2-007-09 | We agree that there remains a lack of consideration of the 'alternative route' and the recent Green Book exercise commissioned by Fylde BC, Wyre BC and Lancashire CC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Please refer to the Applicants Cover Letter (S_SoSQ_65) for the Applicants response to Fylde Council's Economic Assessment. Regarding the alternative route, the Applicants refer to Section 2.2. in their Closing Statement (REP7-042).                                                                                                                                                                                                    |
| C2-007-10 | We note, as with many of the remaining issues, the failure of the Applicant to engage meaningfully                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The Applicants maintain that meaningful engagement has continued.                                                                                                                                                                                                                                                                                                                                                                           |
| C2-007-11 | <p>We share their concerns about the withdrawal of the Morgan promoters and the failure to find a successor. In particular we agree the following:</p> <ul style="list-style-type: none"> <li>i. that Fylde BC must be able to enforce all mitigation measures including s106 agreements against the Applicants and their successors</li> <li>ii. that the withdrawal of the Morgan promoters increases the likelihood of sequential development, which we have consistently warned about, with worsening of impacts on local communities;</li> <li>iii. we agree with Fylde BC that any alternative provider must demonstrate that the development is deliverable and funding is in place;</li> <li>iv. as with other Interested Parties the Applicants are failing to engage meaningfully on issues such as the requested s106 obligations, mitigation for the Lytham Sand Dunes SSSI and the Blackpool Road Recreation Ground s106 agreement;</li> </ul> | <p>Please refer to the Applicants response within row C1-007-04 and C1-015-01 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2.029.3). Regarding the assessment of sequential construction, please refer to Section 2.4 of the Applicants Closing Statement (REP7-042).</p> <p>Please also refer to submissions made by The Crown Estate in response to the SoS (C2-026 and C3-006).</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                     |
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|           | v. we welcome Fylde BC's ongoing commitment to the Green Belt and designated Area of Separation to maintain open countryside between the settlements of Kirkham and Newton with Scales.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-12 | We note the following statement: 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.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position.                                                                                                                                                                                                                                   |
| C2-007-13 | This remains directly contradictory to the below comments from BAE Systems and MOD about the impact on bird strike.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-14 | We note the ongoing failure to resolve issues, which we believe are incapable of being resolved, between the drive to provide mitigation for birds at Newton with-Scales, and the need to avoid an increase in bird strike risk at Warton Airport.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-15 | We note BAE Systems' concerns over the project being a substantial bird attractor and that it presents a material and persistent risk to aviation safety and subsequent risk to life which cannot be adequately or tolerably mitigated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-16 | We also share their concerns that the Applicants' outline Wildlife Hazard Mitigation Plan (oWHMP) is misleading, inaccurate and inappropriate in its assessment of bird strikes, with particular concerns at Newton-with-Scales.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-17 | We also note the concerns expressed by MOD on the creation of an enhanced attractant environment at Newton-with-Scales as being "problematic" from an aviation safety perspective.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-18 | We note their view, similar to our own, that the only acceptable DCO would be one with no number of birds above the current number being tolerated, which directly contradicts the purpose of the habitat creation at the Newton-with Scales site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| C2-007-19 | We note, with some alarm, the complacent approach by the Crown Estate, with a timeline of up to Q1 2027 to identify an alternative provider, with no assurance to local communities of that provider's ability to meet costs and liabilities apart from the Crown Estate's assessment, which is conflicted given their expected income from the project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Please refer to the latest submissions made by The Crown Estate in response to the SoS (C2-026 and C3-006).                                                                                                                                                                                                                                                                                                              |
| C2-007-20 | We note ongoing delays and concerns on the following:<br>a. Blackpool Council etc (C1-027) where there has been no progress on key issues and Morgan have withdrawn from the co-operation agreement;<br>b. Canal and River Trust (C1-006) where land negotiations are stuck as M&M agents are not providing information for Heads of Terms;<br>c. Executors for the late Derek Fare and Michelle Fare (C1-004) where there is no progress on option agreements for Morgan and they have been told this is "permanently on hold", and that all negotiations for the Morgan agreements are paused and will only be discussed when Morgan is recommenced;<br>d. Christine and John Fare (C1-019) where no agreement has been reached and there is no progress for the Morgan proposal; and<br>e. Jean and Harry Kirkham (C1-013) where Heads of terms were not finalised following the withdrawal of Morgan from the joint project.                                                                                                                                                                                                                                                                                                                                                                                                 | The Applicants latest position on land agreements can be found in land rights tracker submitted in response to Secretary of State Consultation 3 Request for Information (C3-008.7).                                                                                                                                                                                                                                     |
| C2-007-21 | Paragraph 7: submissions received during the recommendation period<br>15. Our comments on the submissions made during the representation period are as follows.<br>16. We note and agree with a number of the concerns raised by Lancashire County Council (PIR-001) including:<br>a. gaps and inadequacies in ecological surveys which may also impact on the calculation of Biodiversity Net Gain;<br>b. their criticism of the level and method of consultation on landscape and visual resources with the primary area of concern being the two substation sites, where we have consistently pointed out the failure to engage or inform local people about visual impacts, including the proposed Bluefield solar farm;<br>c. that the current Green Belt designation for the substation sites will result in redesignation as Grey Belt (intended for poor quality or ugly land within the protected Green Belt like disused car parks or old petrol stations) and lead to further development with further loss of Green Belt;<br>d. that alternative substation sites should have been considered, which had lesser impacts on the Green Belt but with the same benefits;<br>e. the failure to agree a position on public rights of way, one of many examples of unresolved issues, including traffic and transport; and | The Applicants refer to their Closing Statement (REP7-042) which addresses a number of these issues. Subsequent updates can also be found in the Applicants Response to Secretary of State Letter and Request for Information (C1-029.39), the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2) and the Applicants' Response to the Secretary of State's Consultation 3 (C3-008.11). |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|           | f. failure to carry out trenching work on time impacting on the ability to gauge and mitigate impact on the historic environment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| C2-007-22 | <p>Paragraphs 9-10: functionally linked land</p> <p>17. The question asks if the substation sites are functionally linked land for golden plover, an SPA species. In November 2023 Natural England commissioned a report submitted with this response which considers (at Section 3.4 and Figure 4, reproduced below and compared with the onshore order limits) that wigeon and pintail use land within 2km of an SPA and whooper swan use land within 5km (these are all species cited in the designation of the SPA, the fourth shown, curlew, is not).</p>                                                                                                                                                                                                                                                                                                                                               | Please refer to Natural England's response to the Secretary of State's Consultation 3 (C3-005).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| C2-007-23 | 18. Most of the cable route is clearly functionally linked land for these species and mitigation, if not derogation and compensation, should therefore be provided for the effects on them from this project and has not been.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | There is no category of effect that is left unconsidered or unaddressed: temporary effects are mitigated by the seasonal working and screening measures secured in the OEMP (C2-029.16), and permanent effects, in accordance with Natural England's latest advice, do not give rise to an AEol requiring mitigation. As AEol can be ruled out for all SPA features (with mitigation secured where required), the derogation stage of the Habitats Regulations, and with it any question of compensation, is not engaged. Please refer to Natural England's response to the Secretary of State's Consultation 3 (C3-005). |
| C2-007-24 | <p>Paragraphs 11-13: golden plover at substation sites</p> <p>19. Although Natural England have focused on golden plover it should be noted that the conservation objectives for the Ribble and Alt Estuaries SPA2 require maintaining or restoring the habitats of the qualifying features, which are 20 species of bird, namely: Bewick's swan, Whooper swan, Pink-footed goose, Common shelduck, Eurasian wigeon, Eurasian teal, Northern pintail, Eurasian oystercatcher, Ringed plover, European golden plover, Grey plover, Red knot, Sanderling, Dunlin, Ruff (Breeding), Black-tailed godwit, Bar-tailed godwit, Common redshank, Lesser black-backed gull (Breeding), Common tern (Breeding). Any of these that use the order land as functionally linked land should have the effects of its loss (or inadequate improvement due to not increasing bird strike risk) mitigated or compensated.</p> | The Habitats Regulations Assessment information provided by the Applicants has considered the full suite of qualifying features of the Ribble and Alt Estuaries SPA and Ramsar site, please refer to REP6-024.                                                                                                                                                                                                                                                                                                                                                                                                            |
| C2-007-25 | 20. We also note that there are flocks of starlings at the substation sites and although these are not protected SPA birds they are likely to increase bird strike risk if their numbers increase through environmental improvements acting as an attractant – this will be the case for many other non-SPA birds as well.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | With regards to bird strike risk, please refer to the agreed joint position statement between BAE and the Applicants at paragraphs 1.3.2.56 to 1.3.2.60 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2.029.2), and the Applicants' Response to the Secretary of State's Consultation 3 (C3-008.11).                                                                                                                                                                                                                                                                                 |
| C2-007-26 | <p>Paragraph 14: Enhancements at substation sites</p> <p>21. The Parish Councils note that if there are to be enhancements that could benefit golden plover this should not increase bird strike risk.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Please refer to the Applicant's response within rows C2-007.23 and C2-007.25.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| C2-007-27 | <p>Paragraphs 15-18: Crossens Outer and Banks Marsh</p> <p>22. Before this site is able to be used for environmental compensation, leaving aside the question of whether it is suitable for that, the Applicants must demonstrate that they have all the necessary land rights to create and maintain such a site and that all those affected by it have been consulted to the same level that would have occurred had the site been included in the application in the first place. Even should that be demonstrated, it is clear that this proposal will not have nearly the level of scrutiny that the rest of the application has undergone and this clearly hurried proposal should be treated with extreme caution as a result.</p>                                                                                                                                                                    | Please refer to the Applicants response within row C2-025-03 of this document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| C2-007-28 | 23. The Parish Councils also note that this site is still within the 13km buffer referred to in EN-1 paragraph 5.5.42, which derives from CAP772 produced by the Civil Aviation Authority.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Please refer to the Applicants response within row C2-007.25                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| C2-007-29 | <p>Paragraph 19: Active Management Measures</p> <p>24. This question goes to the heart of the impossibility of delivering this project as applied for. Proposing additional wording that requires AMM to provide the necessary mitigation while not increasing bird strike risk is likely to be impossible to fulfil</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2.029.2), specifically paragraph 1.3.2.51 onwards regarding the role of Active Management Measures (AMM), and the updated outline Wildlife Hazard Management Plan (oWHMP) (C2-029.18).                                                                                                                                                                                                                                                                                                                     |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicants' response                                                                                                                                                                                                                                                              |
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|           | and so would make the project unimplementable. The Parish Councils strongly argue against a requirement that seeks to resolve this impasse later as it is their view that it cannot be resolved and so the powers of development and compulsory acquisition would be hanging over those affected unnecessarily. This impasse must be resolved by the time a decision is made on this DCO application and not afterwards.                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                   |
| C2-007-30 | 25. The suggestion in paragraph (b) that further as yet unknown alternative mitigation solutions could be put forward at this stage is even more unfair than the late introduction of Crossens Outer and Banks Marsh on parties affected by this application. The scrutiny of an even later proposal is likely to be even more limited. Leaving the specification and securing of compensation until after the decision is made would be unlawful. The Applicants made this application on 21 October 2024 and should not be given yet more opportunities to correct its flaws.                                                                                                             | Please refer to the Applicants response within row C2-025-03 of this document.                                                                                                                                                                                                    |
| C2-007-31 | Paragraphs 20-22: BAE Systems<br>26. The Parish Councils have no comment on these paragraphs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | The Applicants note this response.                                                                                                                                                                                                                                                |
| C2-007-32 | Paragraphs 23-29: Marine ecology<br>27. The Parish Councils have no comment on these paragraphs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The Applicants note this response.                                                                                                                                                                                                                                                |
| C2-007-33 | Paragraph 30: Flooding<br>28. The Parish Councils are pleased that this issue has been taken up by the Secretary of State; flooding is a real issue in this area and the risk to residences, farmland and other property should not be increased by the presence of this project.                                                                                                                                                                                                                                                                                                                                                                                                           | Please refer to Section 1.5 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) regarding flooding.                                                                                                                                               |
| C2-007-34 | Paragraphs 31-33: Funding<br>29. The Parish Councils are of the view that compulsory acquisition powers should not be granted in the absence of the identification of the party who is to exercise them. This is not just an issue for blight claims and negotiation for acquisition by agreement but also there needing to be demonstrated that there is a reasonable prospect of funds being available, as in paragraph 8 of the MHCLG guidance on compulsory acquisition <sup>4</sup> , how any shortfalls are to be met (paragraph 17) and that the funding is likely to be available during the acquisition period (paragraph 18). None of these is currently able to be demonstrated. | Please refer to Section 1.6 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2), and the Applicants' Response to the Secretary of State's Consultation 3 (C3-008.11), as well as The Crown Estate's responses (C2-026 and C3-006) on this matter. |
| C2-007-35 | 30. The Morgan project has clearly gone into reverse already, with land negotiations having paused and an exit from co-operation with Blackpool Borough Council having occurred. The effect of the latter is that anything that was agreed between those parties is now no longer agreed and other agreements may have been voided, as suggested in paragraph 33.                                                                                                                                                                                                                                                                                                                           | Please refer to Section 1.6 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2).                                                                                                                                                                  |
| C2-007-36 | Paragraph 34-35: Crown Estate<br>31. The Parish Councils would be concerned if the consents were transferred to another as yet unknown party by the Crown Estate and note that the provisions of the Morgan DCO (in particular article 7) would need to be complied with pursuant to any such transfer despite what any Crown Estate lease might say, as the law would override a lease.                                                                                                                                                                                                                                                                                                    | Please refer to The Crown Estate's response (C2-026 and C3-006). The Applicants agree with the need for any future party to comply with the DCO, in addition to TCE's leasing requirements.                                                                                       |
| C2-007-37 | 32. The Parish Councils consider that notwithstanding any response given to the question of viability by the Applicants and the Crown Estate it would remain the decision of a new owner whether the project remained viable enough to pursue land acquisition rights by other means, so their answers to this question should be given little weight.                                                                                                                                                                                                                                                                                                                                      | Please refer to Section 1.6 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) as well as The Crown Estate's response (C2-026 and C3-006) on this matter.                                                                                        |
| C2-007-38 | Paragraphs 36-39: Land powers<br>33. The Parish Councils have no comments on these paragraphs other than that agreement with the Morgan applicants is now unlikely if it has not yet happened.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The Applicants note this response.                                                                                                                                                                                                                                                |
| C2-007-39 | Other issues<br>34. Although not the subject of the second request for information, the Parish Councils note that several other issues remain unresolved as mentioned in the response to the first request for information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | The Applicants note this response.                                                                                                                                                                                                                                                |
| C2-007-40 | 35. On biodiversity net gain, the government confirmed on 15 April 2026 how it is to be implemented for nationally significant infrastructure projects for which applications are made from 2 November 2026. While this means such provisions will not apply to this project as mandatory obligations, our previous points remain that other projects have voluntarily provided biodiversity net gain, calculated across their whole order limits, which is in line with what is now proposed;                                                                                                                                                                                              | Please refer to Applicants response within row C1-007-29 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3).                                                                                                              |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicants' response                                                                                                                                                 |
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|           | whereas this project would produce a biodiversity net loss if calculated in the proper way according to the now fully formed proposals.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                      |
| C2-007-41 | 36. The Applicants have still not provided visualisations of the substations as they will be visible by local residents and so this has not been properly tested.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Please refer to Applicants response within row C1-032-02 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3). |
| C2-007-42 | <p>Legal challenge</p> <p>37. The Parish Councils put the Secretary of State on notice that approving this project is likely to be the subject of legal challenge from them or one or more of their residents. This will depend on the contents of the decision letter but is likely to include:</p> <ul style="list-style-type: none"> <li>a. the rationality of granting powers to be exercised by an unidentified applicant, in particular compulsory acquisition powers;</li> <li>b. the rationality of relying on a s106 agreement (referred to in paragraph 44 of the Secretary of State's first request for information) that is not close to agreement and has inadequate safeguards;</li> <li>c. the lawfulness of granting an application that either increased risk to human life or had an uncompensated adverse effect on a Natura 2000 site, or both;</li> <li>d. the lawfulness of a derogation from Habitats obligations given the existence of an obvious alternative to the project;</li> <li>e. the rationality of granting a project with biodiversity net gain proposals that fall so short of the proposals in all other recent consents; and</li> <li>f. the rationality of granting a project with its very significant attendant costs and environmental and social impacts, when there exists an obviously material alternative that not only has a fraction of these impacts but would also have additional benefits of local regeneration through site reclamation and job creation.</li> </ul> | Please refer to the Applicants Cover Letter for more information (S_SoSQ_65).                                                                                        |

## 2.7 Marine Management Organisation (C2-008)

**Table 2.7: C2-008 – Marine Management Organisation Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicants' response                                                                                                                                                                                                                              |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-008-01 | 1.1 The MMO notes that the Applicants have been requested to commit to pre and post construction surveys of geomorphological receptors at the intertidal work area. The Applicant has shared with the MMO an update to commitment 115 (CoT115) with the additional wording "The Offshore In-Principal Monitoring Plan (OIPMP) also includes for monitoring of the recovery of sediments in the intertidal potentially impacted by construction." The MMO welcomes this amendment and have no further comments to make.                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Applicants welcome this response and consider this issue resolved.                                                                                                                                                                            |
| C2-008-02 | 1.2 - The MMO agrees with the need to update commitment 45 (CoT45), or for the Applicants to provide a new commitment to explicitly require consultation with Natural England if it is necessary to deploy any cable protection between Lowest Astronomical Tide (LAT) and Depth of Closure (DOC). In response to point 24 from the Secretary of State's request for information (Ref: C1-001), dated 20 May 2026, the Applicants have shared with the MMO the proposed wording for an updated commitment which reads "No cable protection will be deployed between Lowest Astronomical Tide (LAT) and Depth of Closure (DoC) without the prior written approval from the licencing authority when approving the CSIP and CBRA, in consultation with Natural England." The MMO has reviewed the proposed wording and is satisfied with the update to the Commitments Register in regard to cable protection in the Outline Cable Specification and Installation Plan. | The Applicants welcome this response and consider this issue resolved.                                                                                                                                                                            |
| C2-008-03 | 1.3 - The MMO welcomes the need for an update in the Offshore In Principle Monitoring Plan (IPMP) to include commitments to adaptive management and remedial actions for impacts identified within the Marine Conservation Zone (MCZ). The Applicant has shared with the MMO an updated commitment in the register (CoT142) which reads "Within the Fylde MCZ, boulder ploughs will not be used for the purpose of boulder clearance, and any boulders that are relocated will be redeposited in similar habitat type and randomly to avoid the creation of linear structures which may disrupt sediment transport." The MMO defer to Natural England to comment on this commitment, and we will keep a watching brief over further discussions.                                                                                                                                                                                                                      | The MMO has confirmed to both the Applicants and the Secretary of State that the In Principle Monitoring Plan (C1-029.12) has been satisfactorily updated. The Applicants welcome this confirmation and consider the matter to be fully resolved. |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                           | Applicants' response                                                                                                                                                                                                                                                 |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-008-04 | 1.4 - Regarding Unexploded Ordnance (UXO) clearance, the Applicants have been asked whether it is feasible to relocate UXO from within to outside the Fylde MCZ prior to detonation. The MMO will keep a watching brief over the Applicant's response and may consult Cefas for further advice depending on the Applicant's preference. | The MMO has confirmed to both the Applicants and the Secretary of State that they are satisfied with the recommended updates made to the Commitments Register (C1-029.22). The Applicants welcome this confirmation and consider the matter to be fully resolved.    |
| C2-008-05 | 1.5 -Finally, the MMO looks forward to reviewing the Applicant's response in relation to a without prejudice benthic compensation schedule. The MMO may consult Cefas' benthic ecology advisors on the Applicant's response.                                                                                                            | The MMO has confirmed to both the Applicants and the Secretary of State that they no further comments on the Without Prejudice Benthic Compensation DCO Schedule (C1-029.24). The Applicants welcome this confirmation and consider the matter to be fully resolved. |
| C2-008-06 | 1.6 - We note that the Applicant has updated the MMO via email on 15 June 2026 to state that these updates are made alongside the appropriate updates to the Outline Cable Specification and Installation Plan and In Principle Monitoring Plan. The MMO are happy with this approach.                                                  | The Applicants welcome this response and consider this issue resolved.                                                                                                                                                                                               |

## 2.8 Mandy Hopkins (C2-009)

**Table 2.8: C2-009 - Mandy Hopkins Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-009    | <p>As a recent local resident of XX I am asking on behalf of the local residents that you consider the alternative route of the above proposed development as recently put forward by local MPs and Councils.</p> <p>Myself and my husband walk on the local nature reserve twice daily with our dog, passing and chatting to many locals and visitors who choose the same route daily. Not only is the area full of local plants, and animals including Herons, Toads, Frogs, butterflies, lizards and buzzards, but also a nice walk away from the wind and sand blizzards from the beach on stormy days.</p> <p>The dunes and beach across the road also offer the same wonderful walks with unique plants and habitats of many animals. Featuring one of Lancashire's most important sand dune systems, home to over 280 plant species, rare lizards, and hundreds of wintering wading birds.</p> <p>Taking this away from local residents and tourists for a couple of years would be absolutely heartbreaking. We shouldn't be excluded from what belongs to us.</p> <p>The traffic is busy now at peak times, without future traffic disruptions from the proposed development - Lytham St Annes will be hit hard.</p> <p>All we ask is you please consider the alternative proposed route which is cheaper and has less impact on the local wildlife, habitats and residents of Lytham St Annes.</p> | <p>The Applicants have previously addressed these matters throughout examination. For the Applicants latest position, the Applicants direct Ms Hopkins to the following documents:</p> <ul style="list-style-type: none"> <li>Alternative route - Applicants Closing Statement (REP7-042) – Section 2.2.</li> <li>Nature reserve and habitats – Section 2.3.2 of Applicants Closing Statement (REP7-042).</li> <li>Beach access – Section 2.5 of the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> <li>Tourism - Applicants Closing Statement (REP7-042) – Section 14.2</li> <li>Traffic - Applicants Closing Statement (REP7-042) – Section 15.</li> </ul> |

## 2.9 David Barlow (C2-010)

**Table 2.9: C2-010 – David Barlow Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicants' response                                                                                             |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| C2-010-01 | <p>Having responded to the last two SoS/PI extension notices and also all the deadline dates up to present I find it astonishing that there has not been a single request to the applicants to comment on the effect this is having on human beings within our community. Noting the last request for information regarding the habitat of the golden plover (items 13/14) within the massive substation site, you will see how this highlights the total lack of concern for the receptors expected to live directly opposite who are unable to fly away from the 11 years of disruption and in the position of not being able to sell their property.</p> <p><i>Quote:13.</i><br/> <i>Without prejudice to the conclusions of the Secretary of State's Habitats Regulations Assessment, the Applicants are requested to provide any further information to support their position that habitat loss at the proposed substation sites would not result in an adverse effect on the integrity of the SPA, even if a functional linkage to the SPA cannot be ruled out. The further information should as a minimum: a. quantify land use at the substation sites and how much of specific</i></p> | <p>The Applicants note this response is directed at the Secretary of State (SoS) and has no further comment.</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Applicants' response                                                                                                                                                                                                                                                                                                                         |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p><i>habitat types, e.g. pasture/arable land etc, will be lost; b. quantify land use in the wider area around the substation site and provide detail on what specific habitats will remain available to impacted features such as golden plover; c. provide information on how these sites are known to be used by golden plover and the potential for these habitats to support birds displaced by the substation site. The Applicants are encouraged to work with Natural England to identify any other information relevant to this assessment.</i></p> <p><i>Quote:14. Applicants are requested to explain if works at the substation sites such as balancing ponds and landscaping works provide opportunities for habitat enhancement works that could benefit golden plover.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                              |
| C2-010-02 | <p>Having now lived in limbo for almost the last 4 years, I find it astonishing that this fiasco is still ongoing. There has been total disregard for human suffering and the empathy shown towards people compared to the Golden Plover simply beggars belief. I have no problem with concerns on wildlife, I love the wildlife, its one of the reasons I live where I live but I would imagine when most people die in my community they would we be quite happy coming back as a golden plover. This application started years ago with the flawed consultation, progressed to the six months examination period to finish on the 29th Oct 2025, then the PI stated three months maximum for the SoS to make a decision and here we are still discussing issues like the Golden Plover. You really couldn't write it.</p> <p>The applicants have had plenty of time to present the application within the set dates. A decision should have been made on what was put in front of the PI on the final deadline. It now appears that the government are simply assisting the applicants DCO application, crossing the Ts and dotting the Is, filling in all he missing parts for them and basically marking their own homework. Net Zero will implode, not if but when, and when the country is bankrupt you will walk away into your eutopia with the millions you have accumulated from the green energy scam, oblivious to the mess you have left us all in.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                       | The Applicants note this response is directed at the SoS and has no further comment.                                                                                                                                                                                                                                                         |
| C2-010-03 | <p>On the request bullet point 39.</p> <p><i>Quote: 39. The Applicants are requested to provide any further updates regarding any land right agreements.</i></p> <p>Could I ask for clarification on the following regarding the initial land rights tracker and the ongoing situation up to the present time.</p> <p>As the deadline dates for the application have been constantly extended, has the final agreed uplift been a constant throughout the process. In other words, as the applicant has continually been trying to statistically improve the percentage of agreements made, I am concerned about the protocol that has been implemented. For instance, have landowners who agreed to sign for an uplift, having been told if they don't sign before a certain deadline date they would lose any further rights to an uplift, been offered new terms once the deadline has been extended. I know of one landowner who has to date still refused to sign any Heads of Terms agreements, who has been offered three improved uplifts at different stages as the deadlines continue to evolve.</p> <p>This would then intimate that the original landowners who did sign when pressurised by the first deadline date, should not therefore be held to that agreement. As the deadline dates changed, they should have either been given the option of more time to think about their decision or at the very least given the improved offers offered at a later date to other landowners.</p> <p>To date there are more than 50% who are refusing to sign Heads of Terms agreements for compulsory purchase uplifts, which speaks volumes for the sentiment in the community behind this badly designed cable corridor and depending on the applicant's response to this, maybe just less than 50% wishing they had not signed Heads of Terms in the first place when pressurised to do so.</p> | The Applicants refer to the latest Land Rights Tracker (C3-008.6). The most recent position regarding the Morgan Project is set out in the Applicants response to paragraphs 31–35 of the Secretary of State's letter dated 20 May 2026 (C2-029.2), together with The Crown Estate's response to the Secretary of State (C2-026 and C3-006). |
| C2-010-04 | <p>On the bird strike issue, item 20. I have this to say. You are still asking the applicants all sorts of questions on the habitats and effects on the bird population within the 13km exclusion zone around BAe Systems runway, yet in the next breath you are asking BAe Systems to offer you a mitigated risk assessment that they have constantly referred to as "impossible to mitigate".</p> <p>The simply solution that should have been addressed at the very start of this application is to respect the 13km exclusion zone as it is there for a reason, not just in our country but internationally.</p> <p>At a time when we can't find the money to defend our country, why are we spending all our money on net zero, what's the point? We have ONE company that designs builds and test military aircraft to defend our country, BAe Systems.</p> <p>BAe Systems are not a one trick pony, they are developing all sorts of future military concepts to protect us all and as such are probably the most important company we have. Their Typhoon jets not only protect us all, they offer you the ability to</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position.                                                                                                                                                       |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicants' response |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | <p>acquire the F35s from America at a competitive price. Take away our only mass-produced military jet aircraft and you take away any negotiating muscle you have to buy from abroad. At the moment you can say to America if you do not supply the F35 for less than the Typhoon we will order Typhoons for our air force.</p> <p>This favourable scenario will end should BAe Systems become mothballed due to bird strike issues. If a jet goes down, it will put their operations in jeopardy at a time when the whole country could soon be reliant on them for our national security. To me this bad cable corridor design has all the hallmarks of a 1st year university graduates project, therefore, there is only one decision available to the SoS and that is to take this nonsensical cable corridor design for what it is, nonsensical, and demand a new design taking it away from BAe Systems or preferably to scrap it altogether and concentrate on the defence of our realm.</p> |                      |

## 2.10 Joyce McEvilly (C2-011)

**Table 2.10: C2-011 – Joyce McEvilly Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-011    | <p>I am writing to formally object to the proposals for the Morgan and Morecambe Offshore Wind Farms Transmission Assets. As a local resident residing at XX</p> <p>I strongly oppose the current plans for the following reasons:</p> <ul style="list-style-type: none"> <li>• Environmental and Amenity Impact: The proposed use of local beaches and sand dunes will irreparably damage cherished natural habitats, negatively impact local wildlife, and heavily disrupt tourism.</li> <li>• Disruption and Traffic: The sheer scale of the onshore construction will cause severe traffic congestion and years of disruption to our local roads, which are already under strain.</li> <li>• Lack of Local Mitigation: The developer has failed to adequately consult with local communities and provide robust plans to mitigate the severe environmental and community impacts of this project.</li> </ul> <p>Given the proximity of my XX postcode to the impacted coastal zones, I urge the Planning Inspectorate and the Secretary of State to reconsider the current onshore routing and require the developer to pursue less destructive alternatives, such as estuarine routing.</p> <p>I request that my concerns be fully registered as par of the ongoing DCO process.</p> | <p>For the Applicants latest position on the various environmental impacts raised, please refer to Section 2.3.2 of 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) and The Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2).</p> |

## 2.11 Linda Christine Jarrett (C2-012)

**Table 2.11: C2-012 - Linda Christine Jarrett Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicants' response                                                                                                                                                                                                                                                              |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-012-01 | <p><b>Awareness</b></p> <p>I don't believe that local people have enough awareness or understanding about this proposed project. Most who live on my estate (and it is of significant size and will be directly impacted) have not heard about this project despite claims from the applicant about awareness campaigns in the area. What evidence is there of a wide spread on-going marketing campaign, that clearly states the strategy, objectives, goals and timeframes (in simple terms) to all residents in the area? Did these materials have a 'call to action' so that people would actively have to acknowledge that they received and understood the communications? Was there a plan to update and engage with people on a personal (and ongoing) level in the area, to make sure the level of understanding was adequate?</p> <p>I attended one presentation in the past 5 years and although I was able to put questions forwards, no response or further communication has taken place. This is why the level of awareness falls short of anything I would expect with a project of this size and with such huge implications.</p> <p>The beach, nature reserve, traffic infrastructure, birds, animals, sand dunes, flood defences, noise, pollution are all things that concern me.</p> | <p>Please refer to the Consultation Report (APP-170) for detail on the consultations undertaken.</p> <p>With regards to future engagement, please refer to the Outline Communications Plan (REP7-014), which set out a framework for engaging the community and stakeholders.</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                                                                                                                                     |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-012-02 | <p><i>Alternative route</i></p> <p>There is an alternative that will be far less disruptive, which has been put to the applicant and yet, there has been no change to the proposal to reflect further consideration to this alternative.</p> <p>I would like to see these concerns being taken seriously.</p> <p>I have copied in my MP, Mr Snowden as I'm hoping that a full response concerning the alternative route will be forthcoming. It is not a case of opposing alternative energy, it is more about making sure that projects like these are placed in the best areas with the least disruption to all life and that the applicant is more transparent with awareness campaigns.</p> | For the Applicants latest position, please refer to Section 2.2 of Applicants Closing Statement (REP7-042) and the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2). |

## 2.12 Tony Hardman (C2-013)

**Table 2.12: C2-013 - Tony Hardman Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Applicants' response                                                                                                                                                                                                                                                                                              |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-013    | <p>I am requesting that Ed Milliband and his team put a halt to this badly designed and dangerous project, it will disrupt peoples livelihoods, Green Belt Land, natural Habitat and wildlife, also there would be an increased risk of Bird strikes to Fighter jets manufactured at Bae Warton which could result in devastating consequences.</p> <p>I urge him to investigate as recommended by our local representatives the cheaper, safer and shorter alternative route which would make more business sense.</p> | Please refer to response in row C2-012-02 of this document with regards to the alternative route. In terms of bird strike, please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position. |

## 2.13 Alison Margaret Levi (C2-014)

**Table 2.13: C2-014 - Alison Margaret Levi Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicants' response                                                                                                                                                                                                                                                                                                 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-014    | <p>Ok so, in a nutshell, an offshore wind-farm has been approved for Morecambe bay. This wind farm needs to be connected to the National Grid at Penwortham. An application has been made by BP and a group of overseas 'investors' to run a bunch of gigantic cables from this wind farm through the Fylde coast coming ashore at Starr Gate and then smashing through everything in their path on route to Penwortham. So, through St Anne's sand dunes, (there will be closed for up to 3 years and the local flood risk increased), through the Nature Reserve (likely destroyed forever), and onwards via Blackpool airport.</p> <p>This will involve the digging of a trench as wide as 3 motorways to accommodate the cables and the associated machinery, work force etc.</p> <p>The whole project will take an estimated 11 years of heavy work turning the area into a building site with road closures, delays, noise and air pollution and vibration and involving hundreds of workers and heavy machinery moving around from early morning into evening, 6 days a week.</p> <p>It will also involve the construction of two massive, noisy, unsightly substations at Freckleton.</p> <p>Lancashire council and our MP Andrew Snowden have strongly opposed this project and researched and proposed a shorter, cheaper and less destructive route and there are a group of local people fighting this too, via the Fylde Says No! Campaign. Why? Well, because we have sat through all of the in-depth consultations with the National Inspectorate and the "applicants", and we have no doubt of what is coming and what the impact on our wellbeing and livelihoods here on the Fylde coast will be.</p> <p>This proposed project will not only disrupt traffic and tourism and impact on property prices indefinitely, but it will also bankrupt local farmers and a riding school used by disabled children and decimate local wildlife. In short, it will change the Fylde as we know it forever.</p> <p>The powers that be don't seem to care about any of this. However the key formal remaining sticking point seems to be the fact that all this chaos will disrupt the extensive bird population around BAE Warton Aerodrome and in so doing increase the possibility of a birdstrike bringing down one of their high velocity jets, 20 of which they are currently building there and will soon be test flying over the Fylde for the Turkish Govt. This clearly poses a major risk to human life and one which representatives of the Aerodrome have repeatedly said, 'cannot be mitigated'. The current risk level has been assessed as we understand it as 'medium', and Ed Miliband who is making the</p> | <p>For the Applicants latest position, please refer to Section 2.2 of Applicants Closing Statement (REP7-042) and the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2).</p> <p>Please also refer to BAE's response (C2-027) for their latest position regarding bird strike.</p> |

| Reference | IP submission                                                                                                                                           | Applicants' response |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | final decision re this project by 14th Sept is pushing for them to reduce this risk assessment to, 'low', which so far Warton have said they cannot do. |                      |

## 2.14 David Morris (C2-015)

**Table 2.14: C2-015 – David Morris Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-015    | <p>I am all in favour of green and renewable energy but shocked in the decision to potentially allow a cable corridor from Blackpool Airport all the way through Lancashire into Penwortham. It is not just the damage to local areas and wildlife that would be imposed upon people in and around this route, but also the damage you inflict on local businesses and residents if you grant consent.</p> <p>Traffic is congested at the best of times around Blackpool Airport where I live due to the housing and business estate, and this for me will cause years of misery, noise pollution, and have my part of the local beach closed for several years which many families utilise and enjoy. There has to be a better route that could be taken even if it meant more money being spent in not piling on misery for so many people of Lancashire. And this is just one small piece of the proposed cabling route, I dread to think the thousands upon thousands of people who will have their lives impacted for the worse.</p> <p>I am also shocked that you would allow cabling to be run under both Lytham St Annes sand dunes as well as under Lytham St Annes nature reserve which is an area of SSSI.</p> <p>Surely local politicians for Lancashire should make decisions for their area and not have these decisions imposed upon us by politicians in Westminster who will never be impacted by decisions they make.</p> <p>If this cabling corridor is given consent to proceed, I will have really lost faith in our country and the politicians who make these decisions as this is not about green energy, it will be about money.</p> <p>I hope you do the right and honourable decision in not allowing this cabling corridor to proceed and look at an alternative route which would cause less damage and inflict less misery on so many people for so many years.</p> | <p>The Applicants have previously addressed these matters throughout examination. The Applicants would direct Mr Morris to the following documents:</p> <ul style="list-style-type: none"> <li>• Traffic - Applicants Closing Statement (REP7-042) – Section 15.</li> <li>• Noise pollution - Applicants Closing Statement (REP7-042) – Section 12</li> <li>• Beach access – Section 2.5 of the Applicants' Response to Relevant Representations Part 1 - Introduction and thematic responses (PDA-005).</li> <li>• Alternative route - Applicants Closing Statement (REP7-042) – Section 2.2.</li> <li>• Nature reserve and habitats – Applicants Closing Statement (REP7-042) Section 2.3.2.</li> </ul> |

## 2.15 Gillian Fielding (C2-016)

**Table 2.15: C2-016 – Gillian Fielding Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| C2-016    | <p>I am very disappointed that the SoS did not make a decision on this project and delayed it until September 26.</p> <p>Even at this stage there are still major issues. And we don't seem to have moved any closer to resolving them</p> <p>This project in its current form does not make the grade and needs to be denied.</p> <p>It seems to me that the SoS is hoping that Morgan can be resurrected, but it is not fair on the affected people that have now lived with uncertainty for the last three years and how can you grant compulsory purchase orders for the part of the project that now does not exist whoever takes over if at all would need to negotiate new terms with affected Landowners as Morgans are now void</p> <p>The applicants have had the NSIP process to prove themselves and they have fallen short and should have been judged on the merits of the DCO that was submitted</p> <p>Since then, one project was dropped when they didn't get the cfd</p> <p>That should have been the end</p> <p>But it seems the desperate push forward for offshore wind is determined to proceed at any cost, that is not the way to engage and take communities with you all you have done is turn people against</p> <p>We just need the correct decision based on what was put before the NSIP process, not keep delaying the process to give the applicants more time hoping it can be passed. There has got to be a Final Cut off point</p> <p>Crown estate</p> | <p>The Applicants note this response is directed at the SoS, however, with regards to bird strike, the Applicants refer Ms Fielding to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position.</p> <p>The latest position regarding the updates to Morgan is set out in the Applicants response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (C2-029.2). Please also refer to The Crown Estate's response (C2-026 and C3-006) on this matter.</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicants' response |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | <p>I don't believe we should take the Crown Estates submission on finding a suitable company to take Morgan forward due to the conflict of interest they hold the decision should be based on how the projects merits stand today with Morgan out of the equation</p> <p>BAE</p> <p>I still believe the bird strike risk is a major issue, one that cannot be mitigated under any circumstances. This could be a disaster waiting to happen and could potentially end in loss of life.</p> |                      |

## 2.16 Lynda Goupil (C2-017)

**Table 2.16: C2-017 – Lynda Goupil Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| C2-017    | <p>and yet another 'final' deadline is upon us!</p> <p>How many more final deadlines are we likely to have?</p> <p>Even when BAE release potential life threatening red flags M&amp;M still persist in pursuing ways to get around possible disaster outcomes. Even though one of the 'M's has now withdrawn!</p> <p>BAE can still not mitigate the possibility of a major bird strike nor interference to their radar systems, but still M&amp;M persist!</p> <p>I now discover at this late stage that Unexploded Ordnance is now being discussed. I was never even aware that this was a thing on the Fylde coast! and that EOD, Ministry of Defence Explosive Ordnance Disposal teams are called to detonate the devices! The last one discovered on the beach as recently as May 2024!</p> <p>Let's be honest here, none of this has anything to do with 'green' energy, if such a thing even exists, this is all about BIG business &amp; BIG money!</p> <p>None of these multinationals are even vaguely interested in damage to the environment or, as it appears, damage to life, nature or wildlife &amp; the fact that nothing in their way is going to stop this BIG machine! The whole thing has dragged on for so long now that most of the locals assume it isn't happening &amp; has lost momentum, which I think is another method these big companies use to wear the people down! Many still aren't aware this is even happening so poor has been the publicity!</p> <p>Every time a Final deadline hits not long after another final one appears! How many more are we to expect?</p> <p>M&amp;M seem not to have to adhere to these Final deadlines! M&amp;M just create another final deadline to get around the problems the public have highlighted at the last deadline &amp; on &amp; on it goes!</p> <p>It appears BAE is M&amp;M's biggest stumbling block &amp; BAE is unable to sign off on a potential bird strike &amp; radar interference. This in itself, without any of the other numerous negative factors, should be sufficient to negate the route of this project. The only successful outcome for this whole project is the cheaper, alternate route via Hill House or preferably not to bother at all!</p> <p>I'm still not convinced all the drilling/tunnelling is not going to flood the local area as there is so much house building work currently taking place in the area. They are currently building 100s of houses around the Fylde, across the local Moss area requiring 'piling' pouring 1000s of tons of concrete into their foundations, displacing water. The cable corridor involves tunnelling underneath the sand dunes &amp; local golf course, creating the perfect conduit for the sea to flood the whole, already waterlogged area! I have not yet heard M&amp;M address this?</p> <p>Regarding Morgan having now withdrawn, this surely changes the whole dynamics of this project &amp; all that has gone before &amp;, in my view, negates all the decisions that have gone before &amp; therefore a whole new project should start again from the very beginning!</p> <p>There still appears to be a lot of outstanding action points at this late stage of the process.</p> <p>I still have not heard any logical reasons why the cheaper, more appropriate, alternate route is not being utilised?</p> <p>The application should be refused unless all of these significant issues are resolved before a decision is made &amp; refusal seems the logical outcome!</p> | <p>Regarding bird strike, please refer to Section 1.3 of the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position.</p> <p>Please refer to Applicants Closing Statement (REP7-042) for detail on how UXO, flooding, the sand dunes and all other environmental matters were considered during the examination. Subsequent updates can also be found in The Applicants Response to Secretary of State Letter and Request for Information (C1-029.39) and The Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2).</p> <p>With regards to the alternative route, please refer to the Applicants' Closing Statement (REP7-042) – Section 2.2.</p> <p>The latest position regarding the updates to Morgan is set out in the Applicants' response to paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (C2-029.2).</p> |

2.17 Armistead Barnett on behalf of Colin W Bradley (C2-018)

Table 2.17: C2-018 - Armistead Barnett on behalf of Colin W Bradley Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicants' response                                                                                                                                                                                                                               |
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| C2-018    | <p>Further to the Secretary of State's most recent letter we write on behalf of our client who is the owner of land adjacent to Queensway to the east of Blackpool Airport. Noting the Secretary of State's comments within his most recent letter we note that there is a possibility that the Morgan Offshore Windfarm Project will not be granted the requested Development Consent Order Rights. If that is the case we would respectfully suggest that the routing of the Morecambe Project through our clients land together with the location of the compound will need review as the current routing and location are very much tied in with the routing and location of the cable route and works compound for the Morgan Project.</p> <p>In the event that the Morgan Project are not granted their rights we would respectfully request an opportunity to review the cable route and location of works compound for the Morecambe Project.</p> | <p>Please refer to TCE's latest submissions (C2-026 and C3-006).</p> <p>The Applicants have recently held productive engagement with the land agent on the 11 June 2026 and will continue to do so until voluntary agreement has been reached.</p> |

2.18 Armistead Barnett on behalf of Colin Bradley and Shirley Rayner Porter (C2-019)

Table 2.18: C2-019 - Armistead Barnett on behalf of Colin Bradley and Shirley Rayner Porter Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicants' response                                                                                                                                                                                                                                                                                          |
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| C2-019    | <p>We write in respect of the above and having previously submitted representation in respect of the mitigation area we understood that the mitigation area was unlikely to be required however, recent discussion with the remaining Project have indicated that this mitigation area is now likely to be required. As as the date of writing this there are no viable Head of Terms available for our clients consideration to enter into a voluntary agreement and we would request that the Secretary of State take into consideration when making his decision.</p> | <p>Representatives of the Applicants and Colin Bradley &amp; Shirly Rayner Porter continue to participate in active and productive negotiations</p> <p>The works required to establish, manage, and maintain the mitigation land is set out in the Outline Ecological Management Plan (oEMP) (C2-029.16).</p> |

2.19 Armistead Barnett on behalf of Mr T J Kirkham, Mrs J E Worlock, Mrs J A Myerscough and H & J Kirkham (C2-020)

Table 2.19: C2-020 - Armistead Barnett on behalf of Mr T J Kirkham, Mrs J E Worlock, Mrs J A Myerscough and H & J Kirkham Comments on Responses to the Secretary of State Consultation 2

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| C2-020    | <p>The Owners and Occupiers at XX continue to participate in active and productive negotiations for the required land rights on the project. The issues surrounding access on Ballam Road have been agreed between the parties but there remain outstanding issues regarding Saltcotes Road access and the mitigation area. The Landowners are concerned that the construction access for the Morecambe Project at Saltcotes Road is unnecessarily intrusive and an alternative access as previously described by the Landowners could be used whereby access from Saltcotes Road is direct onto the working area rather than some distance away from it adjacent to the Landowners XX.</p> <p>The Landowners are also concerned regarding the routing of the Morecambe Project when considered in isolation from the Morgan Project and would respectfully suggest that if the Morgan Project is not granted their Development Consent Order that an alternative routing across the Landowners property would be appropriate for the Morecambe Project. In particular we highlight the routing adjacent to XX where a more appropriate routing would be for the Morecambe Project to be situated on the north boundary of the field rather than passing through the middle of the field.</p> <p>As far as the mitigation area is concerned the Landowners are still no wiser as to what exactly is required both in terms of exactly what area the Morecambe Project will require and what works will be carried out and what will be permissible on that area. Whilst negotiations are taking place it is going to be difficult for the commercial terms to be agreed until this additional information is available. We understand from the project that until further works and investigations are carried out it is unlikely that they will know exactly what they want.</p> | <p>The most recent position regarding the Morgan Project is set out in the Applicants' response to paragraphs 31–35 of the Secretary of State's letter dated 20 May 2026 (C2-029.2).</p> <p>The issue relating to access from Ballam Road has now been resolved between the parties. The remaining matters in dispute are commercial in nature and continue to be the subject of ongoing negotiations.</p> <p>The Applicants position on the Saltcotes Road was outlined to the agent on the 11 June and that the access remains as submitted in the DCO.</p> <p>With regard to the mitigation land, the works required to establish, manage and maintain the mitigation areas are set out in the Outline Environmental Management Plan (oEMP) (C2-029.16).</p> |

## 2.20 Fylde Borough Council (C2-021)

**Table 2.20: C2-021- Fylde Borough Council Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| C2-021-01 | <p>Submission 1:<br/>FBC has reviewed all documents submitted since the Examination was closed and provides relevant comments in the following Sections of this statement.</p> <p>FBC has reviewed all documents submitted since the Examination was closed and provides relevant comments in the following Sections of this statement.</p>                                                                                                                                                                                | The Applicants note this response.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| C2-021-02 | <p>Points of disagreement:<br/>Funding, Agreements with Landowners, and Human Health (Examination Library references provided in discussion below)<br/>FBC notes with concern that the Applicants have set out Section 1.1.1.6 of [D1 Funding Statement F03] that the ultimate shareholders for Morgan intend to step away as soon as possible following any decision being issued. This raises concerns with regards to the Applicant's ability to meet potential blight claims.</p>                                      | Please refer to Section 1.6 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) for our latest position.                                                                                                                                                                                                                                                                                                                                                      |
| C2-021-03 | FBC also notes that update to Section 1.2 of [D2 Statement of Reasons F08] which is presented in Section 1.1.1.15 of the same document as presenting clearer detail of funding provides extremely limited additional detail and instead refers back to earlier submissions, thereby not providing the required assurances.                                                                                                                                                                                                 | Please refer to Section 1.15 in the Applicants' Response to Secretary of State's Letter Dated 12 March 2026 (C1-029.39) regarding funding for the Morecambe Offshore Windfarm Project                                                                                                                                                                                                                                                                                                         |
| C2-021-04 | FBC also notes with concern the continued lack of progress and cooperation with regards to land agreements. A number of parties have alleged that despite requests, the Applicants' agents for this matter have not been responsive, for example in [C1-006] from the Canal & River Trust.                                                                                                                                                                                                                                 | Please refer to Section 1.7 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) regarding land negotiations, and to the latest Land Rights Tracker (C3-008.6). With regards to the Canal & Rivers Trust, please refer to Section 1.16 in Applicants' Response to Secretary of State's Letter Dated 12 March 2026 (C1-029.39) as well as Table 2.5 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3). |
| C2-021-05 | Any likely harm arising from compulsory acquisition and rights over land could be exacerbated by prolonged and unresponsive engagement from the Applicants and their agents. Indeed, a number of residents and farmers have explained that the lack of meaningful engagement by the Applicants has had significant harmful impacts on their wellbeing and business operations. Representation [C1-019] provides a clear explanation of this and presents a rather damning picture of the approach taken by the Applicants. | Please refer to row C2-021-04 regarding land negotiations. With regards to the Fare's, please refer to Table 2.18 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3).                                                                                                                                                                                                                                                                 |
| C2-021-06 | Other representations also note that where engagement has taken place, the Applicants' position does not reflect a reasonable approach, for example suggesting that farming operations could continue on land which is being used by the Applicants for mitigation [C1-021].                                                                                                                                                                                                                                               | Please refer to Table 2.20 in Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3).                                                                                                                                                                                                                                                                                                                                                        |
| C2-021-07 | FBC also notes the verbal submissions made at hearings and open floor sessions by local farmers raising these same issues, for example at Open Floor Hearing 1 – Part 1 – 29 April 2025 [00:37:37:08 – 00:38:08:11].                                                                                                                                                                                                                                                                                                       | The Applicants note this response.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| C2-021-08 | FBC is also concerned to note that [C1-004] some landowners have been told that all matters relating to the Morgan interests are permanently on hold, with no further information provided. FBC understands the reasons behind this but consider that it highlights the increased risk of the Applicants not being able to meet the necessary requirements for compulsory acquisition rights to be granted, and disagrees with their assertion that conditional granting of rights is an appropriate way forward.          | Please refer to Section 1.6 in in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) for more information.                                                                                                                                                                                                                                                                                                                                                      |
| C2-021-09 | FBC has raised concerns relating to human health and economic impacts throughout the Examination, with Section 15 of the Local Impact Report [REP1-078] providing an early summary, with Section 8 of the same report specifically discussing agricultural impacts.                                                                                                                                                                                                                                                        | Please refer to Section 14 in the Applicants Closing Statement (REP7-042) regarding Human Health, and the Applicants cover letter (S-SoSQ_65) in response to Economic Assessment submitted by FBC.                                                                                                                                                                                                                                                                                            |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Applicants' response                                                                                                                                                                                                                                                                                   |
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| C2-021-10 | Furthermore, FBC petitioned for the Examination to include a hearing session topic on Human Health several times. The first request was made early in the process at Deadline 1 in Sections 5.3 and 8 of [REP1-079]. This request was not accepted.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Please refer to Section 14 in the Applicants Closing Statement (REP7-042) regarding Human Health.                                                                                                                                                                                                      |
| C2-021-11 | FBC maintains its position with regards to concerns about likely harms to human health, in this case with specific reference to impacts associated with agricultural land and businesses, as summarised in the Final Position Statement [REP7-046].                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Please refer to Section 14 in the Applicants Closing Statement (REP7-042) regarding Human Health.                                                                                                                                                                                                      |
| C2-021-12 | <p>J6 Outline Ecological Management Plan F07</p> <p>Appendix E contains the amended sand lizard mitigation plan. Whilst FBC notes that progress appears to have been made between the Applicants and Natural England in this regard, these ongoing discussions have not included FBC (as Local Authority) and nor is there evidence of Lancashire Wildlife Trust being included in more recent discussions.</p> <p>The relevance of this and subsequent tension is apparent by comparing the retained and additional wording in Section 3.2.1.1 and following Sections, where previous the commitment to agree details with all three parties via the Ecological Management Plans would now potentially conflict with specific mitigation measures now committed to. Specifically, hand-capture and release of sand lizards detailed in Section 3.2.1.4 and Table 3 cannot be assumed to accord with any details yet to be agreed via future detailed management plans. Similarly, details in Sections to 3.2.2 to 3.2.9.1 include specific details which should instead be agreed as part of the same future engagement.</p> <p>FBC notes that the Applicants acknowledge in Section 1.1.1.6 that they have engaged only with Natural England and not with FBC or Lancashire Wildlife Trust. This is disappointing, given the very proactive approach taken by each of these parties, with FBC submitting significant representations on this topic at all stages of the Examination.</p> <p>FBC is concerned that the amendments would reduce the ability of the relevant consultees to appropriately manage impacts on a protected species. This additional text should be amended only to provide an update on work relating to the ESPM licence, with all other related updates to be managed through subsequent engagement relating to the management plans.</p> | Please refer to the Sand Lizard Mitigation Plan (C1-029.8) which the Applicants consider incorporates all amendments discussed with FBC including the installation of temporary exclusion fencing, seasonal restrictions on activities, and the commitment to obtaining an EPSM licence for the works. |
| C2-021-13 | <p>S D3 8 Outline Wildlife Hazard Management Plan and [C1-020]</p> <p>FBC notes the addition of Appendix C which relates to the assessment of bird strike risk at Warton Aerodrome. The assessment sets out that there will be increased risk for most species surveyed.</p> <p>FBC notes the submissions from the DIO [C1-020] and [PIR-006] which disagree with the Applicants' position that the increased risk identified would not have relevant material harmful impacts.</p> <p>FBC maintains its position sets out in Section 2.6 of its Final Position Statement [REP7-046] which notably includes that it is not possible to conclude that the Applicants have met the requirements of Strategic Policy T2 and EN-1 as they relate to impacts on Warton Aerodrome and defence.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Please refer to Section 1.3 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2.029.2).                                                                                                                                                                                       |
| C2-021-14 | <p>S-SoSQ 5 Alternative Ornithology Mitigation Note</p> <p>FBC is concerned that the Applicants are maintaining a position of active disagreement with Natural England, as stated in Section 1.2.6. FBC relies upon Natural England for such matters and defers to their assessment.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Please refer to Section 1.3 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2.029.2).                                                                                                                                                                                       |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Applicants' response                                                                                                                                                                                                                                             |
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| C2-021-15 | <p>Equitation Centre [C1-008]</p> <p>FBC notes the additional qualified evidence provided by the Wrea Green Equitation Centre, which supports previous concerns relating to harmful impacts on the operation of the centre, with related harmful impacts on human health, animal welfare and business activities. FBC considers that alternative locations for the nearby compound should have been considered and that it would not be acceptable to allow for a compound in a position which would give rise to harmful impacts on the centre.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Please refer to Section 1.20 in Applicants' Response to Secretary of State's Letter Dated 12 March 2026 (C1-029.39) as well as the Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 within row C1-008-01 (C2-029.3). |
| C2-021-16 | <p>S SoSQ 9 F01</p> <p>FBC notes that Section 1.6.2.3 should refer to [REP7-028] rather than [REP7-029].</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The Applicants note this response.                                                                                                                                                                                                                               |
| C2-021-17 | <p>FBC BC disagrees with the Applicants' summary of the FBC position at the end of the Examination, particularly with reference to the following Sections:</p> <ul style="list-style-type: none"> <li>• 1.6.2.3: some points remain 'not agreed' in Statement of Common Ground as it relates to Landscape and Visual Resources;</li> <li>• 1.6.2.15: the quoted excerpt is without the broader context and is misleading. Rather than complete satisfaction with the proposed post-consent design framework, FBC maintains areas of concern and disagreement as set out in the Statement of Common Ground itself [REP7-028];</li> <li>• 1.6.2.27: given the potential timescale of the buildout, a stronger commitment to early planting has the potential to have a significant mitigating impact on landscape harm. Up to 12 years of growth time for trees is substantial, with the Applicants own assessment suggesting that 15 years will be sufficient time for the trees to achieve effective screening;</li> <li>• 1.6.2.29: the Applicants state in Section 1.6.2.27 that early planting is unlikely to be possible despite it being identified as an important component of the landscape strategy. It is therefore disappointing to see the Applicants dismiss community-led offsite planting as not being required or proportionate. In such a scenario where early planting is not possible, offsite planting should be considered; and,</li> <li>• 1.14.1: see comments under the 'Funding, Agreements with Landowners, and Human Health (Examination Library references provided in discussion below)' at the beginning of this Section.</li> </ul> | The Applicants refer to their Closing Statement (REP7-042).                                                                                                                                                                                                      |
| C2-021-18 | <p>Points of agreement</p> <p>F1.5.3 ES Commitments Register F08<br/>FBC is supportive of the amendment to CoT81 which prevents works from being undertaken in non-surveyed areas until further targeted surveys have been undertaken.</p> <p>J1.5 Outline Public Rights of Way Management Plan F07<br/>FBC is supportive of the amendments in Section 1.3 to increase the scope of the management plan to also include onshore site preparation works.</p> <p>J1.7 Outline Soil Management Plan F05<br/>FBC is supportive of the added text at Section 1.1.1.5 which restricts work within non-surveyed areas and also references the hierarchy of measures for managing impacts on peat.</p> <p>S S51 2 Schedule of Changes to dDCO F09<br/>FBC is supportive of the following amendments:</p> <ul style="list-style-type: none"> <li>• Sch 2A Requirement 14: wording change agreed but FBC maintains its position within regards to more restrictive working hours;</li> <li>• Sch 2A Requirement 16: addition of 12-month requirement;</li> <li>• Sch 2A Requirement 19: clarification of responsible authorities;</li> <li>• Sch 2A Requirement 25: onshore collaboration additional requirements;</li> <li>• Sch 12 paragraphs 3 and 6: change from eight to 10 weeks;</li> <li>• Sch 12 paragraph 6: specified fees information.</li> </ul> <p>S SoSQ 7 Without Prejudice Outline Code of Construction Practice F01<br/>FBC is supportive of the additional clarification over mobilisation activities but maintains its position within regards to more restrictive working hours.</p>                                                                    | The Applicants welcome this response.                                                                                                                                                                                                                            |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                                                                                                                                 |
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| C2-021-19 | Other Comments:<br>J6 Outline Ecological Management Plan F07<br>FBC notes the amendments made in Section H.2 (beginning page 105) which relate to alternative mitigation for permanent impacts to protected habitats. FBC defers to Natural England with respect to the suitability of these amendments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The Applicants note this response and would direct FBC to Natural England's latest submission (C3-005).                                                                                              |
| C2-021-20 | Submission 2:<br><br>On the 20th May 2026, the Department for Energy Security & Net Zero [DESNZ] wrote to FBC, Lancashire County Council and Wyre Council jointly, in response to a joint submission made relating to the Alternative Route National and Local Economic Assessment known also as the Green Book economic review of the alternative route and connection.<br><br>DESNZ have advised that comments cannot be made on the submitted economic review, on the basis that Ministers are limited by virtue of the role and responsibility of the Planning Inspectorate in determining the application.<br><br>This clearly indicates that DESNZ consider it the responsibility of the Planning Inspectorate to consider the economic review as part of the determination of this application.<br><br>On this basis FBC submitted the following:<br><br>Attachment 1 - Letter of 17 April 2026 to The Rt Hon Ed Milliband MP signed by Lancashire County Council, Wyre Council and Flyde Council.<br>Attachment 2 - Letter of 20 May 2026 in response from Michael Shanks MP<br>Attachment 3 - Alternative route high level feasibility report by Genecon for the 3 local authorities dated April 2026. | For the Applicants latest position, please refer to Section 2.2 of Applicants Closing Statement (REP7-042) and the Applicants Cover Letter as part of this latest submission to the SoS (S_SoSQ_65). |

## 2.21 John Fare, Christine Fare & Fare Farms Limited (C2-022)

**Table 2.21: C2-022 - John Fare, Christine Fare & Fare Farms Limited Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-022    | <p>"Paragraphs 31 to 35 of the Request for Further Information focus on the funding of the Morgan Offshore Wind Project Transmission Assets and ask specific questions of the Applicants and the Crown Estate.</p> <p>As an All Party comment, my clients would like to respectfully point out to the Secretary of State that the further uncertainty around the withdrawal of the Morgan Offshore Wind Project Transmission Assets has caused further stress and anxiety on my client's part but crucially that withdrawal does not mitigate the impact of the Schemes overall on their property. Clearly if the Morgan Scheme doesn't proceed then there will be less permanent land take which post-construction would leave my clients with more of their Farm to farm. But, if the Morecambe Scheme proceeds on its own, the impact in our Submission on my client's business will be the same, it will have to close because my clients still won't be able to access more than three quarters of their Farm and continue their Dairy Operation in its current form because of the impact of the construction of the Scheme and associated cables on the Cow Access Track and the normal operation of the Farm.</p> <p>My clients also observe that this is a Joint DCO for the two Schemes and if there is uncertainty as to the funding and delivery of the Morgan element of the Scheme, then in their opinion the DCO should fail overall and although the Schemes have presented their case to the Secretary of State, the Inquiry and the general public as two Schemes that could proceed independently of each other, they still made an application for a single DCO and if part of the Scheme can't be delivered then that DCO, in our opinion should fail overall and it is quite clear to us from the information we have available that at this present moment in time, the Morgan element of the Scheme hasn't been proved to be deliverable.</p> | <p>The Applicants latest position on the funding associated with the Morgan project is set out in Section 1.6 in Applicants' Response to Secretary of State's Letter Dated 20 May 2026 (C2-029.2) and TCE's latest position is set out in C2-026 and C3-006.</p> <p>The Applicants maintain their position as set out in Section 2.18 of the Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2.029.3), and in particular reference C1-019-02.</p> |

| Reference | IP submission                                                                                                                                                                  | Applicants' response |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | We would respectfully ask the Secretary of State to bear the above observations in mind in coming to his conclusion on whether or not the DCO rights here should be granted. " |                      |

2.22      **Pete & Annette Sharkey (C2-023)**

**Table 2.22: C2-023 Pete & Annette Sharkey Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-023-01 | <p>It is irrational to ask further questions rather than reject this DCO application. The application has too many unresolved issues, financial uncertainty and a clearly better material alternative. The benefits do not outweigh the harm.</p> <p>Below are the issues we raised last time. None of these issues have been resolved. The ongoing process outside of the public hearings format does not feel equitable, rather being biased towards getting the application over the line without proper scrutiny.</p> | <p>Please refer to table 2.4 in the Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3) for the Applicants response to matters previously raised by Mr and Mrs Sharkey.</p> <p>Subsequently, the Applicants would like to refer Mr and Mrs Shakey to the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for their latest position on bird strike matters.</p> |

2.23      **Environment Agency (C2-024)**

**Table 2.23: C2-024 - Environment Agency Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Applicants' response                                                                                                                                      |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-024    | <p>Response to question 30:</p> <p>We are satisfied that the approach taken by the applicant, which was based on the data available at the time, remains appropriate. We do not consider that the further flood data issued by the Environment Agency in its "Flood Zones plus Climate Change" series1 (issued 27 August 2025) should be incorporated into the Flood Risk Assessment.</p> <p>We are satisfied that the approach taken by the applicant, which was based on the data available at the time, remains appropriate. We do not consider that the further flood data issued by the Environment Agency in its "Flood Zones plus Climate Change" series1 (issued 27 August 2025) should be incorporated into the Flood Risk Assessment.</p> <p>The Flood Map for Planning climate change dataset is derived using the NaFRA2 indexing methodology, which is known to overestimate flood risk in many coastal locations. In addition, the dataset does not currently include the water level information required to support site-specific flood risk assessments for climate change scenarios</p> <p>Our advice about the climate change outlines published in the Flood Map for Planning is as follows:- "The climate change outlines published in the Flood Map for Planning show our best understanding of climate change flood risk. It often uses interpolation between available scenarios. In some cases, these are likely to be a little conservative due to limited availability of scenarios at the top end. Further work is being carried out to refine the interpolation method, which is likely to improve these estimates."</p> <p>Therefore, until such time as this 'further work' has been completed, the climate change outlines should be treated as high-level sensitivity testing information, helping to ensure that the potential impacts of climate change are not underestimated.</p> | <p>The Applicant's welcome the Environment Agency's advice that the approach taken and data used in the assessment of flood risk remains appropriate.</p> |

| Reference | IP submission                                                                                                            | Applicants' response |
|-----------|--------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | We are satisfied that the approach taken by the applicant, based on the data available at the time, remains appropriate. |                      |

## 2.24 Natural England (C2-025)

**Table 2.24: C2-025 – Natural England Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| C2-025-01 | <p>Update on Natural England's position following discussions with the Applicant on Functionally Linked Land (FLL)</p> <p>As set out in our Relevant Representations [RR-1601] and during the Examination, Natural England has raised concerns regarding the adequacy of the Applicant's onshore ornithology survey effort, the extent and quality of the supporting data, and the assessment approach used to conclude no Adverse Effect on Integrity (AEol) in relation to the temporary and permanent loss of supporting habitat for the Ribble and Alt Estuaries SPA and Ramsar site. As a route to resolution, Natural England advised the Applicant to apply the mitigation hierarchy in the first instance (avoid, reduce, mitigate, compensate), and to revise and update its assessments accordingly. However, these concerns were not fully addressed in the revised assessment, and the Applicant maintained its position that AEol could be ruled out. Alongside this, the Applicant identified land south of Newton with Scales (NwS) as a potential mitigation option for permanent habitat loss, should mitigation be required.</p> <p>In this context, Natural England's advice during Examination focussed on the suitability and deliverability of the proposed NwS mitigation area, rather than on the Applicant's FLL assessment in isolation. This reflected the Applicant's position at that time that any risks associated with the loss of FLL could be addressed through the proposed offsite mitigation at NwS, which Natural England indicated could be acceptable towards the end of Examination, subject to the relevant details being secured.</p> <p>However, concerns subsequently raised by other Interested Parties regarding the mitigation areas have introduced significant uncertainty as to whether mitigation at NwS can be delivered. In light of that uncertainty, Natural England considers it important that the Secretary of State (SoS) gives weight, in the first instance, to the Applicant's further information on habitat loss at the proposed substation/FLL, including their response to Questions 10-13. These welcome questions align with Natural England's concerns regarding survey effort and assessment in our Relevant Representations and subsequent Examination submissions.</p> <p>Since the close of Examination, Natural England has continued to engage through ongoing discussions and has provided further technical advice to the Applicant. Following the extension to the decision deadline, the Applicant shared additional detail concerning the potential risk to SPA and Ramsar site features arising from FLL loss, together with their draft responses to Questions 10-13. On the basis of our review of that additional information, and provided that the Applicant's final responses to Questions 10-13 are materially the same as the drafts shared with Natural England, it is likely that Natural England would be able to conclude that the loss of FLL would not result in an AEol.</p> <p>Notwithstanding this provisional view, the Secretary of State has specifically invited comments on the Applicant's proposed measures at Crossens Outer and Banks Marsh. Natural England's responses to Questions 15–17 are therefore provided on that basis and without prejudice to its primary position on the Applicant's further information regarding FLL loss. In summary, Natural England does not consider the proposed measures at Crossens Outer and Banks Marsh to be suitable mitigation or compensation.</p> | <p>Natural England has confirmed in agreement with the Applicants, in response to Point 9 of the Secretary of State's Request for Information 3 Part 1 (C3-005), that Adverse Effect on Integrity (AEol) on the Ribble and Alt Estuaries Special Protection Area (SPA) and Ramsar site due to the potential permanent loss of Functionally Linked Land (FLL) from construction of the substations can be ruled out for the project alone and in-combination with other plans and projects.</p> |
| C2-025-02 | <p>9. Natural England's advice on temporary mitigation measures in [C1-016] (response to question 6) was subject to it reviewing the Applicants' updated Outline Ecological Management Plan ("OEMP") (Document Reference: J6/F07). Natural England is requested to review the OEMP and confirm its advice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>The Applicants welcome Natural England's confirmation that they are satisfied with the proposed alternative temporary mitigation options set out in the oEMP (C2-029.16) and consider this matter closed.</p>                                                                                                                                                                                                                                                                               |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Applicants' response                                                                                                              |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
|           | <p>Natural England has reviewed the Applicant's updated OEMP (J6/F07) and can confirm that the Applicant has included our advice on the temporary measures in Appendix H.1, we are therefore satisfied with the proposed alternative temporary mitigation scenarios presented.</p> <p>However, the OEMP currently presents three scenarios, and one option will need to be selected and implemented post-consent. We reiterate our previous advice that from an ecological perspective Scenarios 2 or 3, which include seasonal restrictions and screening measures, would be the preferable options to mitigate temporary impacts to features of the Ribble and Alt Estuaries SPA and Ramsar site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                   |
| C2-025-03 | <p>15. Noting disagreement between Natural England [C1-016] and the Applicants [C1 029] on the additionality of the proposed alternative mitigation site at Crossens Outer and Banks Marsh, the Secretary of State invites Natural England to submit further information, such as the management plan for the National Nature Reserve, and any evidence that funding is secured to undertake such works in the absence of the Proposed Development, to support its position.</p> <p>Natural England maintains that the measures proposed by the Applicant do not constitute additional measures. Appendix 1 contains the previous management plan for Ribble Estuary National Nature Reserve (NNR) (2020-2025). The Plan is currently under review pending preparation of the next 5 year management plan; however, the existing Plan sets out the current and ongoing management framework for the site. The measures presented by the Applicant in 'Alternative Ornithology Mitigation Note – Permanent F01', namely habitat enhancement through grazing control and reduction of recreational disturbance via fencing, are consistent with, and already embedded within, the existing management framework for the Ribble Estuary NNR. The Management Plan (2020 2025) demonstrates that such interventions form part of routine and ongoing site management to maintain favourable habitat condition for SPA and Ramsar site features.</p> <p>In particular, the Plan outlines that active management of grazing regimes, including the use of fencing, stock control and adjustment of grazing pressure, is a core component of maintaining suitable habitat and sward structure for SPA and Ramsar site features. Minimising disturbance to feeding and roosting birds is also identified as a key management objective, with measures outlined to manage public access and reduce disturbance where necessary. As such, the measures proposed by the Applicant reflect established management practices rather than new or additional interventions. On this basis, Natural England considers that on balance the proposed measures at Crossens Outer/Banks Marsh cannot be considered as additional to standard site management. In respect of delivery and funding, the NNR team have previously secured funding to undertake targeted works including repairs to fencing along Marine Drive and habitat enhancement works (e.g. enhancement of a 25-hectare area for breeding birds) and plans to do so for such works in the next Management Plan period.</p> | The alternative mitigation site at Crossens Outer and Banks Marsh is no longer being progressed, therefore this matter is closed. |
| C2-025-04 | <p>16. The Applicants and Natural England are also requested to provide further information on the proposed delivery of the alternative mitigation site at Crossens Outer and Banks Marsh. This should clarify land ownership and responsibilities for securing and implementing long-term management, monitoring and adaptive management for the lifetime of the Proposed Development.</p> <p>In light of the references to "mitigation measures" at Crossens Outer and Banks Marsh in multiple questions, Natural England considers that the proposal would be more appropriately characterised as compensation rather than mitigation.</p> <p>We have previously advised the Applicant through our Discretionary Advice Service (DAS) that this option does not represent like-for-like habitat, due to the area of permanent habitat loss constituting FLL, while Crossens Outer/Banks Marsh is located within the Ribble and Alt Estuaries SPA. As such, the proposed measures do not represent like-for-like replacement habitat. Therefore, the requirements of the Habitats Regulations relating to compensatory measures would apply, including the need to demonstrate that all reasonable avoidance and mitigation options have been exhausted and that no alternative solutions exist. The Applicant would need to demonstrate compliance with the relevant derogation tests before the measures could be considered. Further information can be found here. However, regardless of whether the proposal constitutes mitigation or compensation, Natural England does not consider the measures to be appropriate. Further details are set out in our response to Question 17.</p> <p>Therefore, Natural England continues to advise that if an AEoI cannot be ruled out, consideration of alternative areas is</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document.                                   |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                            |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------|
|           | <p>a necessary step to finding an appropriate location for delivering either mitigation or compensatory measures.</p> <p>Notwithstanding the points raised above, we continue to advise that it would be the Applicant's responsibility to clearly set out the mechanisms for securing the proposed delivery, long-term management, monitoring and adaptive management for the lifetime of the Proposed Development. Further information regarding deliverability is included in response to Question 17.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                 |
| C2-025-05 | <p>17. The Secretary of State notes that Natural England considers the proposed measures at Crossens Outer and Banks Marsh will "likely enhance the environment within the NNR and contribute to positive management of the site. Implementing the measures to support management of the site could lead to positive environmental benefit" (Annex 1 of [C1-016]). Without prejudice to the Secretary of State's conclusion on the matter, the Applicants and Natural England are requested to comment on the suitability of the proposed measures, to provide compensation for impacts to golden plover, should an AEoI on the Ribble and Alt Estuary SPA not be ruled out due to habitat loss at the proposed substation site.</p> <p>Natural England's response to this question should be read in the context of our primary position set out above, namely that the Applicant's further information in response to Questions 10–13 should be considered in the first instance. If, notwithstanding that further information, an AEoI cannot be ruled out, Natural England's position remains that the land south of NwS remains the only viable option for mitigation to address the permanent habitat loss which has been presented to us by the Applicant. Natural England does not currently consider that the proposals at Crossens Outer and Banks Marsh provide sufficient evidence to demonstrate that they would meet the requirements for compensatory measures under the Habitats Regulations, should a derogations case be submitted.</p> <p>Under the Habitats Regulations, the competent authority must be satisfied that all three derogation tests are met. At present, Natural England considers that there is currently insufficient information to demonstrate that the proposed measures would meet the compensation requirements necessary to maintain the coherence of the National Site Network. In particular, we have significant concerns relating to the deliverability, governance and overall responsibility of the proposed measures. We have provided further information on each area of concern below.</p> | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document. |
| C2-025-06 | <p>Additionality</p> <p>As set out in response to Question 15, Natural England has not been provided with sufficient evidence to demonstrate that the proposed measures are additional to existing or baseline site management. The measures described, including grazing management and access control, appear broadly consistent with existing management approaches at the Ribble Estuary NNR. As such, it is currently unclear whether these proposals would deliver ecological benefits over and above those already expected through ongoing site management.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document. |
| C2-025-07 | <p>Ecological suitability</p> <p>Natural England considers that, while the proposed measures may deliver localised habitat improvement, they are relatively modest in scale and nature. The proposals primarily relate to refinement of grazing management and reduction of disturbance, rather than the creation or restoration of habitat providing clearly defined compensatory function equivalent to that being lost. Further evidence would be required to demonstrate that these measures would reliably offset the identified impacts to golden plover and the other waterbird features identified.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document. |
| C2-025-08 | <p>Deliverability and governance</p> <p>Natural England does not currently have confidence in the proposed delivery mechanism. Although the OEMP (F07) suggests that the Applicant would take responsibility for implementation, the governance structure, delivery arrangements and allocation of responsibilities remain unclear. At present, there is no confirmed delivery body with appropriate experience, capability and long-term accountability for delivering compensatory measures of this nature. Natural England does not consider it appropriate for its NNR team to act as the delivery body for developer-led compensation. Such an approach would introduce a clear conflict of interest, whereby Natural England would be responsible both for advising on the adequacy of a compensation scheme and for delivering it.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document. |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <p>Initial discussions between the Applicant and NNR staff were undertaken on the basis that the proposals were being considered as biodiversity enhancement. The requirements and risks associated with compensatory measures under the Habitats Regulations are substantially higher, including long-term delivery, monitoring and adaptive management obligations. NNR teams are not structured, resourced or mandated to manage developer-funded compensation schemes of this nature, nor to undertake the associated contractual and governance responsibilities.</p> <p>Accordingly, should compensatory measures be pursued, these would need to be delivered by a suitably qualified and independent organisation, with clearly defined roles, secured funding, and robust governance arrangements.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| C2-025-09 | <p>Adaptive management and monitoring</p> <p>The proposals provide only high-level commitments to monitoring and adaptive management. Compensatory measures must include a clear framework for monitoring outcomes, defined success criteria, and secured mechanisms to implement adaptive management where required. This level of detail has not yet been demonstrated. Similar to our points above with regards to deliverability and governance, we have concerns that the current proposals imply Natural England will be responsible for adaptive management and monitoring for the lifetime of the Proposed Development and/or while the measures are in place. We reiterate that this is not appropriate for Natural England to be responsible for this.</p>                                            | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document.                                                                                                                                                                                                                                                                                                                                                         |
| C2-025-10 | <p>Timing of delivery</p> <p>There is currently limited detail on whether the proposed measures would be fully implemented, operational and delivering ecological function prior to impacts arising from the Proposed Development. This is a key requirement for compensatory measures, and further clarity would be required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Please refer to the Applicants' responses within rows C2-025-01 and C2-025-03 of this document.                                                                                                                                                                                                                                                                                                                                                         |
| C2-025-11 | <p>Wider constraints (including aviation interests)</p> <p>There remains some uncertainty regarding the compatibility of the proposed measures with other constraints, including aviation safeguarding. Natural England has not seen evidence that the full proposals have been agreed with relevant aviation stakeholders. Given previous constraints in this location, confirmation from aviation stakeholders would be necessary to demonstrate that the measures are deliverable in practice.</p>                                                                                                                                                                                                                                                                                                           | The Applicants have continued to engage positively with aviation stakeholders, in particular BAE Systems and refer Natural England to the substantive update provided in the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2) (paragraphs 1.3.2.10 to 1.3.2.18). This also includes an agreed joint position statement between BAE Systems and the Applicants in response to Points 21 and 22 of the SoS's letters. |

## 2.25 The Crown Estate (C2-026)

**Table 2.25: C2-026 – The Crown Estate Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                       | Applicants' response               |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| C2-026-01 | At paragraph 34 of your letter, you asked whether there are any circumstances in which The Crown Estate would take responsibility for continuing land rights negotiations and providing financial security to meet claims arising from statutory blight until an alternative developer is in place for the Morgan Offshore Wind Project Transmission Assets (" <b>Project A</b> "). | The Applicants note this response. |
| C2-026-02 | At paragraph 35, you indicated that the Secretary of State may refuse to grant compulsory acquisition (" <b>CA</b> ") powers for Project A and asked The Crown Estate to confirm whether Project A would remain viable in planning terms for an alternative company should development consent be granted without CA powers.                                                        |                                    |
| C2-026-03 | We refer to The Crown Estate's previous submission (C1-0170), which confirms that, under the terms of the lease, should Morgan Offshore Wind Farm Limited (" <b>Morgan</b> ") terminate the lease, The Crown Estate retains the right to require that any relevant consents are transferred either to itself or to an alternative developer.                                        |                                    |
| C2-026-04 | At present, no alternative developer has been identified. However, The Crown Estate has begun engaging with the market and expects to be in a position to commence the re-letting of the wind farm site early July 2026. In its previous                                                                                                                                            |                                    |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Applicants' response |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|
|           | response (C1-0170), The Crown Estate indicated that it aimed to have a new developer in place by Q1 2027. This has now been brought forward to Q4 2026.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                      |
| C2-026-05 | The Crown Estate does not consider that there are circumstances in which it would be necessary to assume responsibility for ongoing land rights negotiations or for the provision of financial security in respect of statutory blight claims during any interim period prior to a new promoter being in place.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                      |
| C2-026-06 | Similarly, The Crown Estate does not consider it necessary for development consent to be granted without CA powers. At this time, the Morgan SPV remains an active company capable of maintaining the project pending transfer or replacement, and a revised Funding Statement has been submitted (C1-029.17/8) and, as stated above, The Crown Estate retains the right to require that any relevant consents are transferred to an alternative developer. As set out above, The Crown Estate anticipates having a new developer in place for Project A by the end of this calendar year. There is a clear and established mechanism for transferring the benefit of both the Morgan Generation DCO and the draft Transmission DCO (Articles 7 and 6 respectively), in the event that the Morgan SPV itself is not transferred. This is complemented by The Crown Estate's rights under its leasing arrangements to require any relevant consents and grid connection agreements to be transferred to The Crown Estate or to an alternative company. |                      |
| C2-026-07 | While The Crown Estate supports the inclusion of CA powers in the final DCO, The Crown Estate is satisfied that Project A would remain viable in planning terms without such powers, particularly given that a prospective new promoter would not need to undertake a full DCO application, including the associated pre-application and examination stages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                      |
| C2-026-08 | The Crown Estate is confident, based on the anticipated programme for re-letting the wind farm site and the progress made by the Applicants in relation to voluntary negotiations to date, that there is sufficient programme time to recommence negotiations with landowners, who are already aware of the land requirements of Project A, and, if necessary, to make use of statutory compulsory acquisition powers to deliver Project A.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                      |
| C2-026-09 | In any event, and as set out in its previous submission (C1-0170), The Crown Estate considers that a new developer for Morgan would be appointed in sufficient time to meet the time limit for commencement of development, well within the seven-year period that commenced on 22 September 2025. While the previous submission did not expressly consider onshore compulsory acquisition, The Crown Estate does not consider that a period of 12 to 18 months to secure land rights, whether by agreement or through the exercise of compulsory acquisition powers, would be prohibitive to the delivery of Project A. It is therefore The Crown Estate's position that, should development consent be granted for the Morgan transmission assets without CA powers, Project A would remain viable in planning terms, in that there is a realistic and deliverable pathway to securing the necessary land rights within the statutory implementation period.                                                                                        |                      |
| C2-026-10 | As set out in its previous submission (C1-0170) and reiterated here for completeness:<br>"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 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."                                                                                                                                                                                                                                               |                      |
| C2-026-11 | The Crown Estate considers that this remains the case even if CA powers for Morgan are not included in the DCO, although it would be preferable for such powers to be granted to enable the site to generate electricity at the earliest opportunity. Accordingly, the decision of the current Morgan parent companies not to proceed reflects their individual commercial priorities and does not indicate any underlying issue with the deliverability or viability of the project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                      |

## 2.26 BAE Systems (C2-027)

**Table 2.26: C2-027 – BAE Systems Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                         | Applicants' response                                                                                                            |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| C2-027-01 | <b>Action 20:</b><br>BAE Systems does not have appropriate time to update the bird strike risk assessment noted at C1-023, within the | The Applicants welcome this response from BAE. The Applicants acknowledge BAE Systems' position and agree that air safety is of |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicants' response                                                                                                                                                                                                         |
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|           | <p>timescales allowed. BAE Systems tasked an independent SME to provide a qualitative assessment based on their local knowledge of Warton Aerodrome and the applicants proposal. The risk level is based on engagement with local bird sanctuaries including Martin Mere and Lytham District Wildfowlers Association (LDWA) and other local land owners. This risk assessment could be better informed in the future post-consent through use of BAE Systems bird radar technology which would enable quantitative data to support the qualitative assessment. BAE Systems retain concerns around the impact of larger birds such as Pink Footed Geese and Gulls as a result of changes to migratory bird patterns.</p> <p>Whilst BAE maintains concerns regarding the mitigation areas, particularly in relation to land south of Newton-with-Scales, BAE recognise that there will be updates to the Outline Wildlife Hazard Management Plan and the Outline Ecological Management Plan. BAE acknowledges that the measures set out within the Outline Wildlife Hazard Management Plan, and secured through the corresponding Requirement within the DCO, ensure that the Applicants cannot implement the mitigation measures without BAE's agreement. On this basis, BAE recommends that early and ongoing engagement with the Applicants is undertaken should the Secretary of State grant consent for the project.</p> <p>Air Safety and protection of employees, infrastructure and the local population remain BAE Systems priority and BAE Systems will not accept a reduction in Air Safety.</p>                                                                                                                                                                                                                                                                                                                                                                                      | <p>paramount importance. The Applicants remain committed to working constructively with the relevant parties and addressing any matters that may arise during the Secretary of State's determination of the application.</p> |
| C2-027-02 | <p><b>Action 21:</b><br/>The following is an agreed joint response between BAE and the Applicants.</p> <p>The Applicants and BAE held a constructive meeting on 16 June 2026, during which it was agreed that data sharing and reporting arrangements will be set out within the Communication Protocol to be included in the detailed Wildlife Hazard Management Plan, to be secured through DCO Requirement 27 and developed post-consent in accordance with the oWHMP (S_D3_8/F06).</p> <p>Importantly, the Applicants will align reporting with BAE's existing protocols and established communication channels. It is proposed that bird monitoring data (e.g. flight activity and abundance of target species) will be recorded and reported at regular intervals, to be agreed with BAE (and DIO). In contrast, surveillance data and other information required to inform decisions on the deployment of Active Management Measures (AMM) will necessitate a more dynamic, real-time system for recording on-the-ground observations, which will also be agreed through the finalisation of the detailed Wildlife Hazard Management Plan. BAE Systems (Warton Aerodrome) has active technologies which enable the monitoring of bird movements via radar. This could be considered as part of any solution, post consent.</p> <p>The specific arrangements will be agreed with BAE through the development of the Communication Protocol as part of the approval of the Wildlife Hazard Management Plan. While it was always the Applicants' intention for these matters to be addressed within the Plan, in the oWHMP has now been explicitly updated to ensure that this level of detail is included (with BAE acknowledging these updates to the oWHMP). Table 1.5 and Section 1.5 have been revised accordingly (S_D3_8/F06).</p> <p>These measures will ensure that information is shared effectively and that bird strike risk at Warton will continue to be managed safely.</p> | <p>The Applicants acknowledge and welcome this response.</p>                                                                                                                                                                 |
| C2-027-03 | <p><b>Action 22:</b><br/>The following is an agreed joint response between BAE and the Applicants.</p> <p>BAE Systems could not share data earlier in the examination process due to a lack of an NDA between the two parties. This NDA is now in place to support future data sharing.</p> <p>As noted in response to Question 21, the Applicants and BAE met to discuss bird strike data and associated requirements. It was agreed that relevant data will be shared with the Applicants post consent to support the finalisation of the Wildlife Hazard Management Plan (in accordance with the oWHMP (S_D3_8/F06)).</p> <p>As noted in response to Question 21, the Applicants and BAE met to discuss bird strike data and associated requirements. It was agreed that relevant data will be shared with the Applicants post consent to support the finalisation</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>The Applicants acknowledge and welcome this response.</p>                                                                                                                                                                 |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicants' response |
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|           | <p>of the Wildlife Hazard Management Plan (in accordance with the oWHMP (S_D3_8/F06).</p> <p>The data to be shared post consent is likely to include information such as:</p> <ul style="list-style-type: none"> <li>• Management of bird strike: to understand how monitoring, dispersal, and control of birds is currently undertaken by BAE.</li> <li>• Risk matrix or bird strike risk assessment in current use: to ensure the Applicants' assessment considers the latest risk information and can be integrated with BAE's own approach as far as possible.</li> <li>• Method Statement for Wildlife Management: to better understand how BAE monitors and controls wildlife in proximity to the Aerodrome.</li> <li>• 13 km Aerodrome Wildlife Survey: to better understand how BAE monitors bird activity across the wider area, including identifying fluctuations and areas of high usage.</li> <li>• Wildlife Hazard Management Plan: to identify key risk areas and understand existing passive and active measures, including reporting and communication protocols, to inform the Applicants' approach.</li> <li>• Strike Rate Probability Index: used to track bird strike occurrences and assess risk at Warton Aerodrome.</li> </ul> <p>BAE Systems remain supportive to any arising queries which may come out of the process, prior to the decision in September 2026.</p> |                      |

## 2.27 Rosaleen Forsey (C2-028)

**Table 2.27: C2-028 - Rosaleen Forsey Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Applicants' response                                                                                                                                                                                                                                                                                                                               |
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| C2-028-01 | <p><i>Withdrawal of partner applicant Morgan Offshore Wind Limited</i></p> <p>I note the SOS's announcement that the final decision deadline re this application is now extended until 14th September 2026. It is hard to fathom the reason for this, given that the SOS letter of 20 May 2026 clearly demonstrates that the already numerous serious matters still outstanding, including those involving risk to human life, have actually increased rather than decreased following the withdrawal of one of the original partner applicants, Morgan Offshore Wind Limited. This seems an inadequate length of time within which to further scrutinise, interrogate and resolve these matters in a transparent, fair and ethical manner, given that a mere 12 weeks of this 4 month extension now remain.</p> <p>In addition, since Morgan Offshore withdrew their financial backing and support, and it was apparent that this was not going to initiate a simple change from one partner investor to another, it's clear that all of the prior agreements that were put in place by that partner with Blackpool Airport for example, and also a variety of independent landowners and various local Councils must all now be null and void.</p> <p>Even if the seemingly desperate, last minute and somewhat unethical, (given the conflict of interest), invitation from The Crown for new potential partners to tender to fill the application partnership vacancy left by Morgan Offshore were successful, what the SOS would in fact be looking at by this stage would be a completely different application, involving an entirely unknown partner tearing up the Fylde to link up 30, as opposed to the originally proposed 90 wind turbines with the National Grid.</p> <p>All of these previous agreements then, would therefore surely need to be reexamined, renegotiated and reinstated along side a completely new public and stakeholder consultation process.</p> | <p>The latest position regarding the updates to Morgan is set out in paragraphs 31 to 35 of the Secretary of State's Letter Dated 20 May 2026 (C2-029.2).</p>                                                                                                                                                                                      |
| C2-028-02 | <p><i>ExA Consultation Hearings - unfit for purpose</i></p> <p>In the unlikelihood of a new partner applicant emerging from this rubble and seeking to continue with the application then a new consultation process should be embarked upon. With this in mind it's appropriate here to offer some feedback on last year's consultation with M&amp;M, as a full participant in this process and a frequent attendee at the public hearings.</p> <p>As I, and others raised repeatedly, both in person during the face to face 2025 ExA hearings not least in many of our written submissions, a great many of those who attended found the whole process inadequate and soul destroying in the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>Please refer to the Applicants response within row C2-008-01.</p> <p>The Applicants have previously addressed this matter with Ms Forsey regarding the "inadequacy of the examination hearings". Please refer to table 2.27 in the Applicants' Response to Interested Parties' Submissions at Secretary of State Consultation 1 (C2-029.3).</p> |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Applicants' response                                                                                                                                                                                                        |
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|           | <p>extreme. This was due to a variety of aspects. Venues were chosen in far flung often inaccessible places, usually in Blackpool, and as such situated nowhere near the suggested locations for the proposed cable transmission work in question. Advertising was minimal and those who did manage to attend largely did so as a result of information that was shared locally by word of mouth.</p> <p>There were no leaflet drops to local homes and businesses, no signs or billboards in public places, no adverts on local TV or radio, no information or support staff at local community centres and libraries assisting people with the process and related submissions, no minibuses to enable elderly and disabled residents to participate and no loudspeaker vans touring the area sharing information about these hugely important hearings. There was nothing.</p> <p>Those of us who did manage to find our way along were then repeatedly left with questions unanswered, requests for information ignored and matters of concern repeatedly overridden and on occasion openly laughed at. What we were ultimately being consulted on was an abstract project and all of the knowledge and understanding we developed about it along the way came as a result of our own independent online, in-depth investigations, research and discussions.</p> <p>In short, all aspects of these consultation hearings were unfit for purpose and in the event of another partner applicant being accepted, the very least that should happen is that we should see an absolute return to the drawing board and an immediate adoption of a much more robust, transparent and user friendly consultation process, one that is fitting to the supposed democratic and fair country we live in.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                             |
| C2-028-03 | <p><i>Ongoing unmitigated birdstrike risks.</i></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 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 living in the respective flight paths when raising this matter were using, 'overly emotional language', being, 'dramatic', and, 'exaggerating', when sharing their concerns and fears. What an unprecedented and strange way to respond to people asking questions relating to a serious potential risk to their 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 wrong in that respect.</p> <p>Apparently an agreement of some sort was made with Blackpool Airport back then, in relation to this birdstrike risk and this was covered by an NDA. These are both presumably now no longer applicable following the Morgan Offshore Wind Farm Ltd's withdrawal from the application.</p> <p>As regards Warton Aerodrome, representatives from BAE Warton have repeatedly stated during the consultation and in local media interviews that the substantial risk of birdstrikes on aircraft using Warton Aerodrome cannot be mitigated.</p> <p>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 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> | <p>The Applicants would refer Ms Forsey to the Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for the latest position on bird strike matters.</p> |
| C2-028-04 | <p><i>Lack of Equality Impact Assessment</i></p> <p>As far as I am aware from having attended the hearings and asked many questions while there, no EqIA has ever been carried out with regard to this application. I understand that private companies and organisations are not bound by these requirements, but ethically one could be forgiven for thinking they might want to pursue one as evidence of good ethical practice, but The National Inspectorate is a public body and as such I would have expected them to be robustly pursuing</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>Please refer to the Applicants response within row C2-008-02.</p>                                                                                                                                                        |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                          |
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|           | <p>this as a legal necessity.</p> <p>The initial most obvious and blatant omission in this regard is the 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 application gaining approval Wrea Green would undoubtedly be forced to close.</p> <p>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 should have been carried out with regard to Wrea Green, with the utmost urgency before any decision was made by the ExA re this proposed cable transmission project because what this situation indicates is that disabled people as a protected group, (under the Equality Act 2010), would be disproportionately affected should the application go ahead. I have raised this repeatedly and have received neither an answer nor an explanation as to why this has not happened. In addition, we know here 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 that 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 5+ population in the district is projected to grow by 56.5% between 2018 and 2043.</p> <p>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 and public roads and highways. 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 long 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, which for many of this cohort would mean for the remainder of their days.</p> |                                                               |
| C2-028-05 | <p><i>Proposed Substation Location and related 'consultation'.</i></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 months 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!). These were in the event wholly inadequate, did not represent a real life view of anything useful at all and were of absolutely no help to those living in the vicinity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Please refer to the Applicants response within row C2-008-02. |
| C2-028-06 | <p><i>Destruction of Sand Dunes @ Starr Gate. Flood Risk</i></p> <p>The sand dunes stretching from Starr Gate down to Lytham St Annes are natural, historical formations that have existed for hundreds to thousands of years, it's true they have naturally fluctuated and retreated due to human urban expansion</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Please refer to the Applicants response within row C2-008-02. |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Applicants' response |
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|           | <p>but they remain precious and necessary. While sand dune systems are naturally dynamic and can take thousands of years to build up, Starr Gate's original dunes are centuries old. In fact, the area is historically so defined by these dunes that Starr Gate was originally named after the "Starr grass" that naturally grew in them. Over the years, urban development has consumed some of the dunes which means that what remains at Starr Gate is a crucial natural sea defence.</p> <p>To reverse past and future erosion, the Fylde Sand Dunes Project has been actively rebuilding the dunes using natural barriers and marram grass since 2013. Through these ongoing conservation efforts, the dunes have successfully grown up to 100 meters seaward in certain areas along this coastline, helping protect hundreds of local homes from flooding. So, in addition to the well documented and evidenced risk to the rare sand lizards who make their home in these dunes, any further destruction of these precious commodities built and maintained by these Fylde volunteers year on year is to be avoided in order to prevent serious future flooding.</p> <p>As regards the confident attitude adopted by M&amp;M towards the proposed technique for bringing the wind farm cables through the dunes, a technique known as Horizontal Directional Drilling (HDD), this attitude seems misplaced and cavalier in the extreme. Whilst I'm aware that the HDD process has been previously used on occasion to bring wind farm cables underneath sand dunes in the UK, the fact remains that this process has frequently caused problems in other parts of the world. These have included things like, utility strikes, involving the drill striking and severing existing underground infrastructure, (eg: gas lines, water mains, or fiber optics), also there's something known as, 'frac-out', where the excessive pressure of the drilling fluid causes fractures to the surrounding soil and the fluid seeps upward, polluting local waterways, wetlands and private properties. Then there's, 'ground settlement', where the process of boring causes ground loss. If the borehole is not stable or is drilled too close to foundations, it can cause the surface, (or nearby buildings, ie: local homes), to settle, crack or lift. Finally there's also straightforward, 'tool failure', often characterised by something tellingly known as, 'stuck pipe' where drill heads get permanently jammed or broken off underground when encountering unexpected rock formations or objects. These are not insignificant risks and such problems have occurred in both Denmark and Norway using this process.</p> <p>HDD is not a carefree, safe process which the UK has huge amounts of experience of using and given that the Applicants have caused flooding and damage to land drains during their preliminary investigations on at least two separate occasions already, their track record and levels of precision and care in this regard when overseeing even simple operations are already in doubt.</p> <p>In addition, not forgetting that all of this and the hugely increased flood risk resulting from tunnelling under the Sand Dunes at Starr Gate Beach XX, will undermine any possibility of local residents being able to access adequate affordable flood and building protection insurance cover going forwards thus destining us to live in a state of heightened anxiety for evermore.</p> |                      |

## 2.28 Lancashire Association of Local Councils Fylde Area Committee Energy Working Group (C2-030)

**Table 2.28: C2-030 - Lancashire Association of Local Councils Fylde Area Committee Energy Working Group Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                          |
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| C2-030-01 | <p><b>Letter to SoS. Conclusion:</b></p> <p>The EWG respectfully reiterates its invitation for the Secretary of State and relevant officials to consider the HTEZ/ Stanah option in greater detail and, if appropriate, undertake a site visit.</p> <p>Our principal concern remains that neither the Applicants nor NESO have provided evidence demonstrating that the proposed development represents the most efficient, coordinated and economical transmission solution when compared with the reinforcement and utilisation of existing infrastructure. In particular, no comparative assessment has been presented between the proposed approach—which involves extensive new underground cable routes—and a solution based on the enhancement of existing transmission assets.</p> <p>In the absence of such an assessment, the HTEZ/Stanah proposal remains, in our view, an obvious material alternative that has not been adequately evaluated.</p> <p>Accordingly, we respectfully submit that:</p> | Please refer to the Applicants response within row C2-021-20. |

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Applicants' response                                          |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
|           | <p>a) further assessment of the HTEZ/Stanah alternative should be undertaken before any determination is made; and</p> <p>b) if such assessment is not undertaken, the Secretary of State should carefully consider whether the Applicants' proposal demonstrates that its benefits outweigh its adverse impacts and whether the requirements of an efficient, coordinated and economical transmission system have been satisfied.</p> <p>If not then a refusal is required, and the obvious material alternative remains.</p> |                                                               |
| C2-030-02 | Attachment 1 - Response to 12 March 2026 RFI.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Please refer to the Applicants response within row C2-021-20. |

## 2.29 Anne Olsen (C2-031)

**Table 2.29: C2-031 – Anne Olsen Comments on Responses to the Secretary of State Consultation 2**

| Reference | IP submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Applicants' response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| C2-031-01 | <p>I live in St Anne on the Sea and strongly object to the plans to route these cables through our community. We are a tourist resort with three road routes in and out of our town. Any roadworks large or small cause havoc to these access routes causing major congestion. These planned works will increase this havoc, lose the town tourist and with that a loss of income for many. The planned route will also impact our local farmers who will face bankruptcy as a result of losing their land. Allowing this planned route will have a detrimental impact on the everyday lives of residents. It is not just human residents that will be impacted, this plan will destroy a local nature reserve home to birds and small wildlife. This area will not recover from the destruction Please halt this badly designed and dangerous project. The plan as it is will also increase the risk of bird strikes for BAE at Warton, something that could cause loss of life and impact BAE business. Please investigate the cheaper, safer and shorter alternative route that has been recommended by our local representative and save our town from being destroyed.</p> | <p>The Applicants have previously addressed these matters throughout examination. For the Applicants latest position, the Applicants direct Ms Olsen to the following documents:</p> <ul style="list-style-type: none"> <li>• Tourism - Applicants Closing Statement (REP7-042) – Section 14.2</li> <li>• Traffic - Applicants Closing Statement (REP7-042) – Section 15</li> <li>• Farm holdings - Applicants Closing Statement (REP7-042) – Section 10</li> <li>• Nature reserve and habitats – Section 2.3.2 of Applicants Closing Statement (REP7-042).</li> <li>• Alternative route - Applicants Closing Statement (REP7-042) – Section 2.2</li> <li>• Bird Strike - Applicants' Response to the Secretary of State's Letter Dated 20 May 2026 (C2-029.2), as well as BAE's response (C2-027) for the latest position on bird strike matters.</li> </ul> |