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Dear Secretary of State

**Morgan and Morecambe Onshore Transmission Assets DCO application
Response to fourth (10 August 2026) request for information**

Introduction

1. This is a response to the Secretary of State's fourth (10 August 2026) request for information on behalf of Newton-with-Clifton and Freckleton Parish Councils, for whom TLT acts. We note the short length of time to respond – four working days during a holiday period – which will reduce the ability for some parties to participate and have an equalities impact.
2. This response covers the request in paragraph 9 of the letter and also comments on submissions made in response to the second part of the third request for information, which were also published on 10 August 2026.
3. The general points about the application and a decision on it made in the [first](#), [second](#), [part one](#) and [part two](#) third responses still stand.

Paragraph 9 of fourth request for information

4. The Secretary of State asks that the Applicants comply with the request about working hours made in the first request for information, by submitting amended documents that reflect the removal of mobilisation and demobilisation hours.
5. The Parish Councils are grateful for this request as the Applicants have not fulfilled what was asked of them in the first request for information and are having to be reminded about it; the Parish Councils strongly support the removal of the additional hours.



Commentary on responses to part 2 of third request for information

The Applicants (C3-017.1-13)

6. The Applicants' latest submissions frequently refer back to previous documents which has the effect of ignoring later submissions and other developments; in particular they do not address the cancellation of Morgan leading to a 75% loss of benefits, the continued lack of visual renderings, the use of the Community Benefit Fund, dropping the mobilisation/demobilisation periods (as referred to above), the inadequate treatment of biodiversity net gain, and they do not provide digestible information on landowner progress.
7. The Parish Councils note the Applicants' response to their setting out of areas for potential legal challenge ([C3-017.1](#) pages 5 and 6) and make the following observations.
8. The comment above the table that this is premature is misconceived; quite the reverse, it is giving the Secretary of State the opportunity to address these areas before making the decision.
9. In the defence of the lack of a Morgan promoter, the Applicants say that Morgan Offshore Wind Limited is clearly identified as an applicant. That may be true, but it is a matter of record that that company will not be exercising the powers of the DCO if they are granted any. It is no different to granting a DCO without an identified undertaker at all that obliges one to be identified before powers can be exercised, which would clearly be an improper use of the Planning Act 2008 process.
10. The Parish Councils note that there has been progress with the s106 agreement, but it still has not been agreed, with a 'handful' of points to be finalised. It now only apparently covers Project B, Morecambe, when it was previously going to apply to both. Would a new Morgan promoter sign a s106 agreement?
11. Natural England has ruled out an adverse effect on integrity, but the preference given to not increasing bird strike risk, if achievable at all, is likely to be at the expense of the quality of environmental improvements, without it being clear how they would be watered down (see further below).
12. The biodiversity net gain concern is not addressed other than by re-stating what the Applicants propose.
13. Finally, it is not clear what the Applicants' argument actually is for placing negligible weight on the alternative route (via Rossall Beach and Stanah) even if it is considered material. This application should be refused if the alternative route is material and relevant to the decision. The alternative route is indeed currently outside the control of the Applicants but could become the subject of a different DCO application made by them that would bring it within their control and has manifestly lower impacts of all kinds.
14. Following that analysis the Applicants say that substantive progress has been made on all principal outstanding matters, which may be the case but that does not mean that they have been resolved satisfactorily. The Parish Councils consider that there remain an unacceptable number of unresolved issues of concern to third parties, which together with the significant impacts following mitigation reported in the environmental statement (see [Non-technical summary](#) paragraphs 7.5.5.2, 8.4.5.4, 8.6.5.3, 8.7.5.2, 8.11.5.3) and those which the Applicants consider have been resolved but still constitute adverse impacts, such as BNG and ornithological mitigation, outweigh the remaining benefits of the project.
15. The Applicants have produced a table responding to submissions made on the second request for information including the Parish Councils' ([C3-017.12](#), pages 3-8), on which the Parish Councils comment as follows.

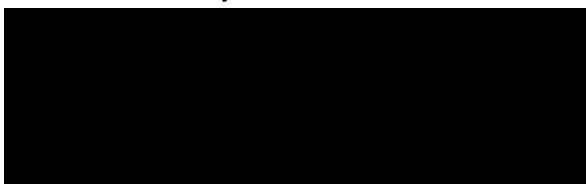


16. The issue of lower benefit following the departure of Morgan claims to be addressed in the 'Co-ordination and Good Design' section of the Applicants' second response, but it is not mentioned. Regarding bird strike it refers to C2-007-01, but that must be incorrect as it is the reference of the entry that contains this text, making it difficult to see where the issue is addressed.
17. On the impossibility of squaring environmental mitigation and not increasing bird strike risk (row C2-007-29), reference is made to paragraph 1.3.2.51 in the Applicant's second request response, which in turn refers to the Active Management Measures in the outline Wildlife Hazard Management Plan. These merely highlight the fact that if they are implemented, the mitigation for ornithological impacts of the project becomes ineffective.
18. For example, one listed mitigation measure is supplementary feeding of geese, swans and waders in the winter months, and the Active Management Measure is to withdraw the feeding (paragraph 1.4.4.1 of the oWHMP). Other measures to discourage birds include shooting them (paragraph 1.4.4.2). How effective will commitments such as CoT16 and CoT76 protecting breeding birds if they might get scared away or killed? How effective will the creation be of Fairhaven Saltmarsh permanent mitigation area, Lytham Moss temporary construction (if it proceeds) and alternative permanent mitigation area and South of Newton-with-Scales permanent mitigation area (see e.g. outline Ecological Management Plan [C2-029.16](#)), which are all to mitigate impacts on birds, if the birds will be regularly scared away or killed? How will the measures to reduce disturbance to birds through screening and seasonal working in substitution for the temporary Lytham Moss mitigation (e.g. in the ES Addendum [C3-008.41](#)) be effective if the birds could be scared away or killed? The knock-on effects of the primacy of bird strike risk on ecological mitigation have not been addressed, a serious omission.

Fylde Borough Council ([C3-018](#))

19. The Parish Councils support FBC's concerns about the Applicants' statements about progress not aligning with statements made by third parties and that third parties are given little time to consider significant new proposals; that site selection would have been different had only Morecambe been promoted; and whether screening to reduce disturbance from noise would in fact be effective.

Yours sincerely



Partner
for TLT LLP