



Rt. Hon. Secretary of State
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Date: 19 June 2026

SENT BY EMAIL ONLY

Dear Rt. Hon. Secretary of State

**Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Consent Order
Response to SoS Consultation of 20 May 2026**

Fylde Borough Council [FBC] is a statutory consultee and main impacted party for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Cables proposal.

This cover letter is provided by FBC for submission at the Secretary of State [SoS] deadline of 22 June 2026. This cover letter is provided in duplicate for two submissions as follows:

- Submission 1: Comments on documents associated with the proposals and published on the National Infrastructure Project website dated between 17 April 2026 and 20 May 2026 (inclusive); and,
- Submission 2: Submission of an Alternative Route National and Local Economic Assessment.

FBC considers that separate submission is appropriate in order to assist the Examining Authority with organising the examination library. However, FBC also considers that both submissions should be considered alongside each other, as well as all previous submissions, in order to gain a full understanding of the Council's position at this deadline.

This submission is the work of the FBC officers and no part of it has been generated by AI.

Submission 1

FBC has reviewed all documents submitted since the Examination was closed and provides relevant comments in the following sections of this statement.

Whilst some progress has been made with regards to some matters following the end of the Examination period, FBC remains concerned that the Applicants are not able to fully explain how development would come forward or justify its impacts, and considers that this uncertainty may be at the heart of deficiencies in the ES and dDCO.

Points of Disagreement

Funding, Agreements with Landowners, and Human Health (*Examination Library references provided in discussion below*)

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.

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.

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.

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.

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].

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].

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.

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.

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.

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].

J6 Outline Ecological Management Plan F07

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.

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 3.2.2 to 3.2.9.1 include specific details which should instead be agreed as part of the same future engagement.

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.

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.

S_D3 8 Outline Wildlife Hazard Management Plan and [C1-020]

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.

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.

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.

S-SoSQ 5 Alternative Ornithology Mitigation Note

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.

Equitation Centre [C1-008]

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.

S SoSQ 9 F01

FBC notes that Section 1.6.2.3 should refer to [REP7-028] rather than [REP7-029].

FBC disagrees with the Applicants' summary of the FBC position at the end of the Examination, particularly with reference to the following Sections:

- 1.6.2.3: some points remain 'not agreed' in Statement of Common Ground as it relates to Landscape and Visual Resources;
- 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];
- 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;
- 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,

- 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.

Points of Agreement

F1.5.3 ES Commitments Register F08

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.

J1.5 Outline Public Rights of Way Management Plan F07

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.

J1.7 Outline Soil Management Plan F05

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.

S S51 2 Schedule of Changes to dDCO F09

FBC is supportive of the following amendments:

- Sch 2A Requirement 14: wording change agreed but FBC maintains its position within regards to more restrictive working hours;
- Sch 2A Requirement 16: addition of 12-month requirement;
- Sch 2A Requirement 19: clarification of responsible authorities;
- Sch 2A Requirement 25: onshore collaboration additional requirements;
- Sch 12 paragraphs 3 and 6: change from eight to 10 weeks;
- Sch 12 paragraph 6: specified fees information.

S SoSQ 7 Without Prejudice Outline Code of Construction Practice F01

FBC is supportive of the additional clarification over mobilisation activities but maintains its position within regards to more restrictive working hours.

Other Comments

J6 Outline Ecological Management Plan F07

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.

Yours sincerely,



Steve Smith
Service Director for Planning and Building Control
Fylde Borough Council