

Adding low carbon generation to the existing network is justified where it is appropriate and of benefit to the public interest and the economy. However, the result of our existing generation mix is to deliver some of the highest electricity prices to industrial, commercial and residential consumers in the developed world. Although the reasons for this are complex the renewables industry relies largely on subsidies in some manner to provide any commercial viability and the approval of any new projects should not be given simply because it meets some existing or historic political aspirations.

At the recent hearings held by the Examination Authority in Blackpool the Applicant's representatives used the expressions "climate emergency" and "urgent need for connection". For every expert who states an opinion that there is a "climate emergency" another could be produced to say there is not. There is no universal consensus on this matter. We can agree that the climate may be changing, and that some of this is a natural phenomenon and that some is the inevitable result of greenhouse gas emissions. Either way the United Kingdom plays a very small role in its effects on global climate change. Therefore, new electricity generation projects should be considered only on their specific merits and their impact on the existing environment, in this case both on and offshore, and of their impact on the local communities, businesses and industry affected by their proposals.

And neither should they be approved simply because they comply with a political intent regardless of whatever historic national policy statements exist. In response to the drive to "Net Zero" no lesser figure than Sir Tony Blair, whose significance in the Labour Party needs hardly to be addressed, has stated words to the effect that politicians cannot pursue these climate objectives without taking the electorate with them. In other words, there are political consequences to blindly continuing with a climate policy if this alienates the electorate. Recent election results have shown how public opinion can rapidly change and there is no evidence to support that there is widespread consent amongst the general public to the "net zero" agenda. In a poll of 26,000 readers recently carried out by the Daily Telegraph 95% of respondents wanted the Net Zero target to be scrapped. And the Danish renewables company Orsted has recently withdrawn investment from the Hornsea 4 Windfarm due, it is understood, to the commercial viability of this project given rising installation costs. So emotive statements such as "climate emergency" and "urgent need to connect" are opinions not facts and should not be given any weight in the ongoing consideration of this very large, highly complex and massively intrusive application.

The lack of demonstrable public support also weakens the "public interest" defence particularly when this is used to defend the intrusion on Human Rights established under the Human Rights Act 1998 and the European Convention on Human Rights, particularly Article 8 "Right to Respect for Private and Family life". In paragraph 2.25.2.10 of Document S\_PD\_3.1 11th April 2025 F01 (EXA Library Reference: PDA-005) the Applicant states: *"The need for the Transmission Assets is set out in the Planning Statement (APP-233) and is summarised in section 1.4 of the Statement of Reasons (AS-009). This demonstrates that the development is within the public interest given the significant benefits Morgan Offshore Wind Project and Morecambe Offshore Windfarm will bring"*.

As argued above I do not believe that the Public Interest defence can now be relied upon as the tide of public opinion has turned regarding the implications of the "Net Zero" crusade. The content of policy documents relied upon, whilst they may still be in place, represent political thinking having taken place on an historic basis and is not now necessarily reflective of current attitudes which are

more likely to be concerned with the rising cost of energy and the loss of agricultural land and habitat to these heavily subsidised “*Clean Energy*” projects.

The Council of Europe Toolkit to the ECHR states in respect of “Private Life” that the interpretation is expansive and goes beyond the ordinary meaning under many national systems. “Private Life” is a wide concept under the Convention and goes much further than privacy and covers amongst other things “....freedom from noise or toxic emissions”. Similarly “Home” can include both residential and business premises and “The right protects the peaceful enjoyment of living in the Home, free from unauthorised entry and also from nuisances like noise and other pollution”. As stated above the definition of “Home” includes both residential properties and commercial businesses. It can also be argued that the term “nuisances” can go beyond “noise and other pollution” which are arguably indicative examples only.

The only legitimate interference with this Right under Paragraph 2 of Article 8 which could apply is “the economic well being of the country” and this must be demonstrated to be “necessary in democratic society to fulfil that aim i.e. not excessive, arbitrary or unfair”.

This highly intrusive, complex and very large civil engineering project will cause detriment to local residents and businesses and interfere with their rights under Article 8 of the ECHR. The case for this project as regards “the economic well being of the country” is no longer compelling nor “necessary”. The protracted timescales for development, irrespective of the lack of commitment by either Applicant to pursue a concurrent build, and the inevitable disturbance to local residents, businesses, vulnerable persons, the local economy, local agriculture and both flora and fauna are not “necessary in a democratic society” and are “excessive....and unfair”.

This application for a Development Consent Order should therefore be denied.

## The Landfall Works

### 1. Summary

This representation looks at the impact of the proposed Landfall Works as defined in the Applicants documents.

It considers the proposed methods of installing the lengthy conduits (steel pipes) underground through highly sensitive areas and whether these are realistically achievable. It enquires as to what alternative methods are proposed if implementation using underground drilling/boring techniques fails.

It raises concerns over the impacts of noise, vibration and structural damage to adjoining and nearby residential and commercial properties.

It refers to the statements made during the recent hearings held in Blackpool that although this is a joint application neither party will commit to a concurrent construction neither will they commit to consecutive works thus extending the proposed timeframe for these disruptive intrusions over an indefinite time frame.

It argues that the information presented to the General Public has been unclear and the scale of the proposed works and the impact of the heavy equipment required both on and offshore is buried in one of the numerous technical documents submitted in the Application and the effects on local residents, businesses and the local economy have not been made clear in an open, transparent and accessible manner. The technical and practical challenges of pulling off shore cables a distance of 7,000 metres (this distance is as stated in the Applicant's supporting documentation) through up to six separate lengthy underground steel pipes should not be underestimated and the risks fully understood by all affected parties.

Finally, in respect of the many issues raised in this and other submissions and representations, it asks the Examining Authority to decline this Application for a joint Development Consent Order in respect of both Applicants.

### 2. Submission

This representation concerns the proposed landfall works, that is the entirety of the works to be carried out from the proposed Transmission Joint Bays (TJBs) situated within the curtilage of Blackpool Airport to the point at which the offshore cables reach the beach at the Mean Low Water Springs point. As there are potentially six offshore cables to be installed and pulled through to the TJBs, this means there will up to six beach "landing points" for the offshore cables which will be separated by, it is understood, a 20 metre distance between each.

From the TJBs the Applicants propose to use a continuous trenchless digging method to install steel pipes underground for each of the proposed six offshore cables from Blackpool Airport, under the Golf Course, under the Railway Line, under the Nature Conservancy Site, under Clifton Drive North and under the Sand Dunes until the pipe exit points on the beach which are understood to be situated 100 metres from the toe of the Sand Dunes (the point at which the Dunes meet the beach on

the seaward side). There will be up to six of these steel pipe exit points on the beach and separated across the beach by distances understood to be no less than 20 metres between each exit point.

Although indicative cable corridor routes have been identified from the TJBs to the beach the Applicants have not, to my knowledge, given any specific information regarding the length of the proposed underground direct drilling routes of which there will be up to six. It should be perfectly possible at this stage for the Applicants to indicate what the minimum and maximum distances could be from the TJBs to the Pipe Exit Points on the Beach without committing to using either or both of the proposed cable corridors. They would be indicative figures only.

This specific information on the length of the proposed drilling/boring work would provide the Examining Authority (EXA) and the general public with a greater appreciation of the scale of these proposed civil engineering works. At the recent examination hearings held in Blackpool one of the Applicant's representatives is understood to have said that these proposed underground drilling works would be "challenging". When I hear the word challenging this suggests to me that it may not be possible to succeed with these proposed underground trenchless methods in which case what is their alternative? Open cut trenching across the Nature Conservancy Site and the Sand Dunes would be completely unacceptable in any circumstances. The project is therefore committed to drilling considerable distances underground in order to achieve their objectives without seeming to specify what they would do if this proved impossible in part or in full.

My understanding is that although the Horizontal Directional Drilling (HDD) method can in theory be used for longer distances the process involves an initial underground drill followed by successive back reaming i.e. more than one pass would be required. It carries the risk of bore hole collapse before the pipe conduit is pulled through and the underlying nature of this soft unstable coastal ground presents its own challenges.

The Direct Pipe method involves the boring head to be attached to the pipe conduit so in theory the boring and conduit pipe installation are continuous. However, it is understood that the distances that can be drilled using this method are shorter than those achievable by the HDD method which is why I believe the Applicants should, at this early stage of Examination, produce figures for the proposed minimum and maximum lengths of the proposed underground drilling routes (of which there will be up to six) so that the feasibility of employing either of the above two methods can be properly assessed and the Applicants required to show what they would do if either method failed.

The Applicants state in their Application "*The Applicants do not consider it is necessary to include additional drafting in the draft Development Consent Order (DCO) (AS-004) providing for a landfall construction method statement concerning the Work Nos. noted as the details of the construction methods are set out in Volume 1, Chapter 3: Project description (AS-024). Adherence to the scope of works set out in that chapter is secured through the wording in the DCO that requires the project to be in accordance with the environmental statement*".

For a civil engineering project of this scale, involving the laying of up to six Extra High Voltage cables (*understood to be operating at voltages between 66,000 and 110,000 volts - these figures are taken from the separate Offshore Windfarms Development Consent Order Application*) through sensitive coastal landscapes the EXA and the General Public should be presented with specific detailed accessible and easily absorbed information regarding these proposed Landfall Works so that the scale and achievability of these proposed works can be properly assessed. The Examination

Authority should be entirely satisfied that the proposed engineering solution is practical and can be delivered irrespective of any other further comments that are made regarding noise, vibration and compensation in the event of structural damage to nearby properties.

According to the Outline Offshore Cable Specification and Installation Plan Document Reference J15 (EXA Reference APP-220) in Paragraph 2.2.1.2 it appears that only one off shore cable pull in is allowed during the winter months between November and February inclusive which suggests an elapsed period of up to 6 years if the off shore cable “pull-ins” are consecutive. In other words either all of the onshore drilling/boring works from the TJBs to the Pipe Exit Points on the Beach take place at the same time and the protective Cofferdams remain in place for years until the cable “pull-ins” are completed or, for each successive year, another drilling/boring exercise takes place to install another pipe cable conduit for next offshore cable to be pulled through. And this uses the assumption that the two projects are consecutive without any time gaps between them. If one starts years after the first the inevitable disruption seems to be endless.

The above suggests that the Cofferdams will be required to be in place for some time and it is difficult to see how they can be both erected and secured for the purposes of health and safety and general security without fencing off large areas and thus severely restricting access on the beach for the general public and amenity users. The Cofferdams themselves are stated to have an area of 15 meters by 5 meters (75m<sup>2</sup>) in one of the Applicants documents (the reference to which is not immediately to hand). These Cofferdams will presumably be constructed using pile driven steel sheetpiling and their height will need to take account of the tidal range in this area e.g for Monday 12th May 2025 low tide at 05.58 hours of 1.6 metres and a high tide of 8.2 metres at 11.44 hours, as forecast at Blackpool. There are no graphical representations of these coffer dams which would be helpful and also no illustrations to show their impact on the beach landscape especially if they are to be there for some time.

The applicants should produce a focused piece of work going into greater detail concerning the proposed landfill works and their interaction with the offshore cable laying as the two are clearly linked. The proposed boring/drilling works need to be completed for each offshore cable before it would be possible for these to be pulled through the underground pipe conduits. At the point where each pipe exit point emerges on the beach these will presumably need to be protected by the proposed Cofferdams until the cable pulling works are completed. Therefore any protective fencing for safety and security will be in place until the cable laying and pulling works for each cable are completed. Paragraphs 2.2.1.1 and 2.2.1.3 to 2.2.1.4 of APP-220 go on to give more details of the constraints faced and the offshore vessels that may be required to be in place to achieve the cable pull ins which are stated to be up to 7,000 metres to the Transmission Joint Bays. This should give some idea of the scale of heavy equipment that is likely to be required to achieve these objectives and I believe that this will inevitably have impacts on beach and offshore access for amenity users and these impacts will be in place for some time despite the Applicants assurances to the contrary.

Further to the above, buried away in the Applicants numerous supporting documents, and I say this because the detail concerning the landfill work is extremely hard for the general public to find let alone appreciate the impacts it will have, is Section 3.14 of Volume 1 Chapter 3 of the Environmental Statement Document Reference F1.3 (EXA Reference: APP-024) . This section of the document does in fact provide further information on the Landfill works and also includes

images of the types of heavy duty equipment that will be required to carry out the drilling/boring activities and the cable pull ins. It can be seen that these are significant and I would suggest that the general public have no idea of the scale of these Landfall Works because they have never been presented to them in a format or manner which could be easily absorbed and considered. One way to have done this would have been through an open and transparent exhibition or focussed public meetings concentrating solely on the Landfall works which, with due respect to others affected, are likely to impact the greatest concentration of residents and visitors in one area. This has not happened so I believe the general public are largely unaware of the scale of what is proposed whatever the Applicants representations regarding the Consultation activities say.

The impact of the construction elements of this Application should also be considered in relation to the proposed work to replace the existing sea wall defences at the St Annes on Sea "Island" site which are scheduled to take place between 2023 and 2025. These will have a massive effect on access to the beach in this area whilst these major civil engineering works take place and may in themselves affect tourism and the local economy as well as the amenity value of both the beach and adjacent promenade. Coupling the works with the proposals from the Applicants can only result in detriment to the attractiveness of St Annes as a tourist destination as well as the increased impacts on local residents.

The Applicants state in their application documents :-

*"The nearest care home is approximately 35m from the Transmission Assets Order Limits (i.e. the closest point to the care home at which the offshore export cables could be installed). However, at this location at landfall where the Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that the installation of the offshore export cables under Lytham St. Annes Dunes SSSI and the St. Anne's Old Links Golf Course will be undertaken by trenchless installation technique. This is secured by Requirement 8b within Schedules 2A and 2B of the draft Development Consent Order AS-004). Section 8.11.2, of Volume 3, Chapter 8: Noise and Vibration ((APP-117) has assessed the potential impacts of construction of the Transmission Assets on the care home and concluded that with appropriate mitigation secured through the DCO, the potential effects would be minor adverse, which is not significant in Environmental Impact Assessment (EIA) terms".*

I do not agree that their conclusion is accurate and believe it should be challenged. Given the scale of works proposed it is impossible to believe that the effects on noise and vibration will be "*minor adverse*". Every reference I have seen online to HDD or Direct Pipe methods states words to the effect that noise and vibration are inevitable and the effects of these in the unstable geology of the Fylde Coast are speculative.

In the recent hearings held in Blackpool it seems that issues regarding noise & vibration were dismissed as having little or no impact by applicant's lead counsel. I do not believe these issues can be so summarily dismissed and need much greater investigation as the EXA process continues. The Century Care Home also provides nursing care so it is more than likely that their some residents may, in view of age and health, be particularly fragile and I cannot see how large scale civil engineering works effectively on their doorstep will in any way not have a demonstrable impact on their health and well being.

There also seems to be little consideration for the residents of the adjacent Dunepoint Apartments whose properties are directly next to one of the proposed cable corridors.

At the recent hearings I understood the Applicants to have stated that they will have no liability for any structural damage outside of the Development Consent Order boundary. Perhaps I understood this wrongly but given the nature of the proposed trenchless drilling/boring methods surely full responsibility for any structural damage to nearby properties must be assumed by the Applicants? The Mining Remediation Authority (formerly the Coal Authority) state on their website "*We (the Coal Authority) or statutory Licensees have a legal duty to take remedial action if a property is affected by subsidence damage caused by coal mining operations.*" Given that in the majority of cases this is likely to result from historic tunnelling work I do not see why comparisons cannot be drawn with these proposed invasive methods and the Applicants made responsible for any structural damage which occurs through their Landfall works.

The Applicants have produced an Online Bentonite Breakout Plan Document Reference J1.13 (EXA Reference APP-xxx) and in Paragraph 1.5.1.1 describe a description of Bentonite and the additional additives which may be used. They cannot rule out the lubricating fluid breaking out of the bore and although they propose breakout response methods in section 1.8 of this document I am concerned at the risk of pollution and contamination in this sensitive marine and coastal environment.

Finally with regard to this joint application for a DCO. It seems to me that the Applicants are trying to have it both ways. On the one hand they argue that this joint application avoids the need for two radial connections despite both grid connections being proposed at NGC's preferred connection point at Pentwortham and therefore, by default, implying a joint cable corridor whichever cable route were to be chosen.

On the other hand they state quite clearly that these are two completely separate very large, complex and highly intrusive civil engineering projects to install onshore Transmission Assets that are financed, installed, owned and operated by two completely separate consortia of Companies who have no commercial interdependence and both of whom cannot and will not commit to any concurrent construction works thereby raising legitimate fears that if consecutive these proposed works could drag on for years.

There is no benefit to the well being of the local community or the coastal environment or economy from these very large, complex and highly intrusive civil engineering works arising from this joint application for a Development Consent Order should therefore be refused by the Examining Authority.