

Issues with the application route

The application route between landfall at Blackpool Airport and Penwortham substation has serious flaws and insurmountable impacts and should not be consented, even without considering alternatives, but as demonstrated below there is in addition a much more convenient alternative.

As was heard at the hearing (or at least not disputed when questioned by the Examining Authority), the Applicants have failed to assess the proposed environmental enhancement area at Lea Marsh Fields for increased risk of bird strike at Blackpool Airport and Warton Aerodrome and may therefore either add an unacceptable risk to human life or if it reduces the enhancement area, not provide adequate ecological mitigation. The proposal only assesses lost habitat at the proposed permanent infrastructure and not along the cable route, when (page 34 of) [biodiversity rules](#) require the inclusion of habitat that will not be fully restored to its original type and condition within two years of being impacted, so biodiversity losses are being significantly under-reported.

The cable route is 30km long, as shown in tables 3.18 (landfall to substation) and 3.28 (substation to Penwortham) in the Project Description ([[AS-024](#)]). This compares with 2km from the coast to the edge of the Hillhouse Enterprise Zone, appropriately zoned for energy infrastructure and the owner of which wants the project sited there (see [[RR-1656](#)]).

Furthermore the Applicants wish to be able to choose whether to build the two cables at the same time or sequentially, with no limit on how long each construction will take and up to a four year interval between finishing one and starting the other (derived from the separate seven-year commencement obligations in paragraph 1 of Schedules 2A and 2B respectively of the dDCO ([[AS-004](#)])). This unacceptably doubles the environmental impacts of construction; instead, the earlier Applicant should be required to wait until the second project is either ready for construction to allow simultaneous construction or is declared not to be going ahead before it can commence.

The chosen route has many other adverse impacts, outlined in more detail below. These include:

- the permanent, and given the alternative, unnecessary, loss of 22.1 hectares of Best and Most Versatile agricultural land (see paragraph 6.11.2.10 of ES Chapter 6 [[APP-104](#)]);
- the use of unsuitable rural roads for construction traffic, with increases of heavy vehicles of up to 1740% (table 7.22 of ES Chapter 7 [[APP-108](#)]) and the effects of closing major routes such as Clifton Road North and Queensway (dDCO Schedules 4A and 4B);
- impacts on heritage assets such as the Quaker burial ground (see paragraph 5.11.2.10 of ES Chapter 5 [[APP-096](#)]);
- substantial levels of compulsory acquisition (the Book of Reference [[AS-011](#)] is 1925 pages long);
- increased flooding risk caused by the works (see paragraph 1.10.2.4 of [[AS-044](#)]);
- the cumulative visual and other impacts of this project and others in the area resulting in increased industrialisation of a rural area and a lack of photomontages from properties in the area (table 3.24 in [[APP-144](#)] suggests only recreational impacts have been assessed);
- issues with the dDCO such as no obligation to construct the works where shown on the Works Plans, not clear that commitments in the Code of Construction Practice (CoCP) must actually be implemented.

Alternative Route

We welcome the Planning Inspectorate's approach to reporting on alternatives and referencing the Stonehenge and Langley Park School judgements. Both set precedents around considering alternatives, and the concept of alternatives being obviously material ([Stonehenge judgment](#) paragraph 277) where there are clear objections to a proposal ([Langley Park judgment](#) paragraph 45) (links included since the Examining Authority raised them).

This project has an alternative that is even more ‘obviously material’ than the above cases that has not been considered; in contrast to the Stonehenge alternative that was considerably more expensive and the decision was quashed because of it nevertheless, this alternative is much cheaper and more advantageous in nearly every way.

The only reason given for the chosen route is the existence of a connection agreement to Penwortham substation. The Applicant did not say whether it applied for a connection to Penwortham or it was National Grid that decided the connection should be to Penwortham, if the latter it may be because it would cost National Grid less if the connection were at Penwortham even if the overall cost to the public purse would be much greater. I request that Ofgem is brought into the examination by means of questions so that it can be satisfied that the costs of the project are economic and efficiently deployed.

If Penwortham is a must-have, which I would argue it is not, then a much less impactful and much cheaper route could still be provided via the Stanah substation further north and along the existing but not fully used pylons between Stanah and Penwortham.

Details of the alternative route

There is an established connection of an Irish Sea Wind Farm to Penwortham. This routes via the National Grid line that runs northwest to Hambleton and then on to Middleton/Heysham. At Hambleton, there is a tee junction to Stanah substation to which Walney 2 is connected and which supplies Blackpool North and the Isle of Man.

This existing line has 400KV capability already but to accommodate more offshore wind power, additional cables would be beneficial on the existing pylon system. Using indicative costing data from the latest IET 2025 report on Transmission Technologies would suggest a saving of £900m could be achieved from using the established Northern Route infrastructure via Stanah-HTEZ rather than the applicants' conflicted, all new cross-Greenbelt route. It would be irrational to spend such a large amount of money unnecessarily.

The line is capable of taking the power levels of M&M at normal operating levels, which is at about 40% of maximum capacity. Looking to the future, the excess could be used to generate green hydrogen, which is the proposed use by the current site owner of Hillhouse TEZ land. We would be happy to offer a more detailed assessment to the Examining Authority.

We note the various attempts by the applicants to avoid responsibility for considering any alternatives. These include the Michael Shanks MP response to Parliamentary written question 19898 which clearly references an earlier version covering a Morecambe Bay scheme. Instead, the applicants looked for complex and costly engineering solutions rather than simple options and continue to refuse to acknowledge any possibility of an alternative route.

Likewise, the applicant also defers the decision on landfall to National Grid without applying any critical questions either to the decision, or to the rationale for that decision, which is based on outdated and inaccurate understanding of the situation.

The Moor Vannin proposal shows that a wider landfall area can be considered and would allow the option of the ‘alternative route’ with all the advantages that M&M have ignored.

EN5 2.3.17 seeks the reduction of impacts. It is telling that the applicant repeatedly defers to National Grid any responsibility for the decision on landfall, route and connection point. There remains no acceptance of any responsibility by the applicant for options to get power to Penwortham instead they simply ‘do as they are told.’

Landfall should be based on the shortest and most direct route. The alternative route is shorter, has available landfall, connects to an available substation and whose owner wants it. It meets all four criteria in the Holistic Network Design Review (HNDR) -

1. Cost to consumer - [Predicted saving via alternative option of £900m](#)
2. Deliverability and Operability - [Maximise use of existing infrastructure with room for additional infrastructure on a Government Enterprise Zone brownfield site](#)

3. Impact on environment - Removes the bird-strike issue completely, the need to impact on RAMSAR and protected sites and requirement to use Greenbelt land
4. Impact on local communities - Removes the impacts on local communities, environment, health & welfare and businesses totally

The Applicant said that Stanah substations would need more 400KV cabling but this is incorrect. It is already 400kV.

The alternative proposed removes all of the issues that follow, without exception, and also would benefit the offshore route by taking the cable path outside of a protected offshore area close to Blackpool.

Site selection and joined up approach

The Site selection was predetermined given the extension of search area from 5km to 8km, and the downgrading of taking 22Ha of Green Belt to Amber instead of Black or Red. In general the Applicants' comparison of alternative routeings was not clearly explained and may have been flawed.

It has become clear that far from being a joined-up proposal there are no benefits to local communities of a joint proposal from M&M. Their proposal maximises the impact to the area. There are concerns about the corporate structure of the applicants and their financial viability.

The applicants refuse to commit to a single period of construction, instead wanting to allow a period of up to four years between schemes, with 3 years for the first scheme, up to four years gap and then a further 3 years with a period of at least 10 years allowed. This is only of benefit to the applicants and not to local communities impacted by these proposals.

A truly strategic approach would mean one set of works and one substation minimising impact. One proposal could wait for the other to ensure this and a limit for the overall time could be set. These matters can be enforced in the DCO.

Consultation and engagement with stakeholders

It is clear that there are numerous examples of where there is a lack of clarity, a lack of engagement with major stakeholders and failure to respond constructively to reasonable requests from the Panel and others. This lack of engagement is reflected in the lack of detail in the applicant's submission and impacts such as bird strike being missed. The lack of detail shows poor preparation, poor engagement with stakeholders and poor co-ordination between the two sides of the project.

Agriculture

The failure to ensure concurrent rather than sequential construction will have a detrimental effect on local landowners and farmers. Instead of farmers losing their land for 3 years they will lose it for up to 10 years, or even more if construction of the second project takes longer than estimated. There is little opportunity for any activity 'in-between' and livestock herds cannot be turned off, on, off and on again during a 10 year period. Equally, arable land will be damaged during construction with too little time to recover before further damage and disruption in the second wave of construction. The financial impact of this prolonged construction is profound and possibly permanent.

Beach Access

The prospect of a beach closure at St Annes was dismissed by the applicant, whereas it is clear that closures of the beach will occur and there appear to be no mitigation plans for access in place. The applicant refused to provide plans for the beach when asked by the Inspectors.

Furthermore there is an outstanding risk assessment and engagement with the Environment Agency which means their commitment is not secured. There is an ecosystem under the dunes that has not been adequately considered by the applicant and any damage has no planned mitigation.

Air safety

We are concerned at the lack of engagement with BAe Systems and the failure to commit to a survey. Their importance to us in terms of our defence, and to the local economy is profound and would be compromised without an agreement on managing birdstrikes. The applicant is sluggish and unresponsive to legitimate concerns on air safety and the future of BAe Systems. Indeed, it seems that no likely mitigation is available according to BAe Systems. The alternative removes this risk entirely.

Community Benefits

Unfortunately, M&M avoided defining any community benefits until the application has been approved and so cannot be regarded as benefits in reaching a decision on the application. TASC has offered to engage with M&M about how community benefits, in line with [Government guidance](#) issued on 9th April 2025, might work if the proposal was approved. This was rejected out of hand by the applicant. The new community funds guidance means communities should get £530,000 per substation.

Cumulative Impact

Existing projects already cover 225 acres with nuclear and solar energy within my Parish – larger than the villages of Newton with Scales and Clifton together. In addition there are two proposed solar farms making another 249 acres. One of these, planning application with reference 24/0541 on the Fylde Council website “Installation of a 32 hectare solar farm with associated infrastructure including: series of solar photovoltaic arrays, switch rooms, substations, inverters power stations, fencing, pole mounted CCTV cameras, access tracks and landscaping with biodiversity measures” on the land west of Parrox Lane, Newton with Clifton, is adjacent to the proposed M and M substations. Previously rejected because of the poor access for hundreds of HGV’s down Parrox Lane, it now proposes an access route for construction which runs along Lower Lane, Freckleton (which is also proposed for the M&M traffic) and then onto a bridleway, public right of way, leading onto a track which goes across the cabling route and crosses a Main River feeding the Ribble RAMSAR site. The applicants’ proposal clearly avoids these proposed solar farms but given they are likely to be considered by Fylde Borough Council Planning prior to the end of this DCO examination it is unclear how any conflicts in access would be addressed. These proposals in total would result in a non-stop sea of solar panels, substations and cabling route on the greenbelt and best and most valued farmland between Newton with Scales, Freckleton and Kirkham. It is very clear that there has been no consideration of the cumulative impact of these proposals on the local community.

Ecology

Many birds on the UK red list for birds of conservation concern have been observed on the land scheduled for the substations over the past 5 years, including: lapwing, grey partridge, greenfinch, house martin, marsh warbler, curlew, black tailed godwit, woodcock, dunlin, lesser spotted woodpecker, mistle thrush, herring gull, common cuckoo, swift, yellow wagtail, marsh tits, marsh warbler, skylark, yellowhammers house sparrows and starlings. Other protected species include great crested newts, hedgehogs and pipistrelle bats.

From the Biodiversity Statement [AS-054] it seems that they are only providing biodiversity net gain (BNG) for the permanent land take. The rules require land that is used temporarily and not fully reinstated for two years also to be included in the BNG calculation; presumably that will apply to most of the cable routes, so they should be included as well.

Any reduction in the quality of (the permanent) habitat at Newton March, Lytham Moss, Freckleton Marsh and Lea Marsh to discourage birds from visiting it will have a consequential effect on the biodiversity score so it may not be possible to satisfy BNG requirements (admittedly not yet a legal obligation but recommended in policy) and avoid increasing bird strike risk. The proposed habitat can be found on page 56 of APP-106

These points were summarily dismissed as BNG was not a legal requirement despite this being a government intention, that the applicant was seeking to meet it, and would be a legal requirement later this year.

Flooding

It is unclear that all aspects of the questions posed regarding flooding and drainage have been fully accounted for. Examples of this relate to mitigation of the issues of interrupting the drainage water courses by the build work especially if it is not known exactly what has been done previously and these works lie hidden below ground, which many drains will do, especially on farmland.

Much of the land is already prone to flooding.

Heritage

The Lancashire Historic Environment Record shows there are Bronze Age Cairns, Roman Fort settlements and Quaker burial grounds. Freckleton, Newton and Kirkham are all mentioned in the Domesday book. There have been numerous Roman finds in the areas of Kirkham and Dowbridge areas, where there was access to the sea along the river Dow. Indeed one of the tracks proposed for HGV access south of Newton is called 'Thames Street'. The Lancashire Historic Environment Record states: "This area of Lancashire is considered to be one of the richest areas of Neolithic to Bronze Age activity within the North West" therefore causing potential damage to future archaeological research and buried artefacts.

Allegedly the church and lost hamlet of Kilgrimol may remain buried in the sands under the site of the incoming cable route, between Starr Gate and St Annes.

Local economy

We welcome the Planning Inspectorate seeking a review of the impact of the proposals on the Fylde rather than the whole North West, taking into account of Fylde being a peninsula. The current approach is too high level and the assessment is not appropriate.

National Planning considerations

The NPPF sets out the need for "very special circumstances" to justify use of Green Belt land and that there should be consideration of public health and wider defence and security issues. The applicants' case does not adequately justify the use of green belt or take adequate account of these other issues.

Recreation spaces

It is disappointing that the applicant wrongly excluded Sport England as a Statutory Consultee. As with other areas there is a lack of clarity about the nature of the works proposed and a lack of detail regarding the impact of the proposed works on recreation areas in the Fylde.

Safety

Because of the location of Blackpool Airport, there are only two north / south major arterial roads between Blackpool and St Anne's. One is Clifton Drive to the west of the airport and the other is Queensway to the east of the airport. Both roads become major bottlenecks when planned roadworks are carried out on just one side of the airport, causing long queues of traffic and severe delays. Both these roads will need to be crossed by the cable route. We have not seen any 'emergency vehicle impact statement' in relation to access by Police, Fire, Ambulance and Coastguard emergency vehicles.

Stakeholder Engagement

We are also concerned that many other issues remain unresolved. These include:

- The LPG and liquid ethane routes which are crossed by the cabling route
- Impact of increased traffic, including heavy goods vehicles, on pedestrians, motorised wheel chair users, horse riders, and cyclists
- Concerns about birdstrike impacting on air safety for local people. There is major local sensitivity on this subject. In 1944, an aircraft crashed into a school in Freckleton, killing many children and it remains the worst disaster for loss of life on the ground in England.
- Concerns about the failure to agree a transport plan and its impact on traffic accidents and fatalities.
- Substation failure and proximity to residential areas as shown by three recent examples of substation fires.
- Penwortham substation access where whilst there is development capacity for limited expansion this is likely to be consumed by National Grid NESO plans for development of the grid itself. In addition, there are issues with access to the site with existing roads being single track and designed for light traffic only.
- Helical Technology on Hillhouse Lane, Warton, who have never been consulted by the applicants

Traffic and Transport

There are already issues with existing road capacity and delays. This includes the M6 access to the Fylde where there are regular accidents and delays. It also includes Preston Road Lytham which prevented some members of the public attending the hearings.

We support the concerns expressed by Lancashire County Council (LCC) about flawed traffic plans and the need to not compromise on safety. In particular we have concerns about 5km of roads that do not appear able to take this level of traffic either in terms of road quality or sharing with pedestrians etc. These include “moss roads” which LCC has a specific policy for and which are not suitable for heavy vehicles. There was not an opportunity to examine this in depth at the Issue Specific Hearing.

There remains no detailed or agreed transport plans as sought by LCC and Fylde Borough Council.

Applicants’ Ability to deliver

The Examining Authority have already posed questions about the arrangements for delivery of the project. These include a lack of co-ordination of any kind on sequencing the projects for the benefit of local communities and businesses, the lack of a single JV or a unified team to run the project and the financing and governance for the project, particularly after the fundamental reset by BP. Our concern is that these failings will result in a ‘zombie’ project clogging up the route for other more viable and less damaging windfarm projects.

Summary

We consider that a much shorter, cheaper, less damaging alternative can connect to Penwortham via Stanah, using an existing National Grid line, already 400KV capable, with cost savings estimated at £903m at current prices. The alternative would use a designated brownfield site, and create jobs in one of the most deprived areas of Lancashire in future energy intensive, green hydrogen production, yet applicants dismiss its feasibility, opting for complex solutions. The applicants avoid responsibility for landfall decisions, deferring to National Grid and hence they have opted for a conflicted, all new, cross-Greenbelt route

Concerns arise over site selection, extended construction periods, and lack of benefits to local communities. Consultation efforts are insufficient, leading to stakeholder frustration. Agricultural impacts include prolonged and permanent land loss and disruption. Beach access at St Anne's faces likely closures without mitigation plans. Air safety concerns remain unresolved due to poor engagement with BAE Systems. Emergency access restrictions for blue light vehicles during the construction period would create a danger to residents.

Community benefits remain undefined despite available government guidance. Existing and proposed energy projects threaten to overwhelm greenbelt areas. The cumulative impacts of substations, cabling, and solar farms lack adequate assessment. Biodiversity concerns persist, with protected bird species inhabiting affected areas. Temporary land use remains unaccounted for in biodiversity net gain (BNG) calculations. All of these issues are worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption.

Ultimately, the alternative route offers a more direct, cost-efficient, and environmentally viable solution that has been ignored by applicants.