



Local Impact Report

**Morgan & Morecambe Transmission
Cables Examination**

IP Reference-20053931

May 2025

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1. Introduction and Approach

- 1.1.1 Fylde Council [FBC] is a statutory consultee and Interested Party for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Cables proposal.
- 1.1.2 In preparing this Local Impact Report [LIR] in accordance with Section 60(3) of the Planning Act 2008 (as amended), FBC has shown due regard to relevant guidance, including the 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' published by the Planning Inspectorate on 08 August 2024 (updated 16 December 2024).
- 1.1.3 FBC has sought to set out the likely impacts of the proposed development within the Fylde local authority area, with reference to the Fylde Local Plan to 2032 (incorporating Partial Review) [FLP] and other material matters and guidance.
- 1.1.4 The approach taken in preparing this LIR has been to separate out matters relating to the Environmental Statement [ES] and to the draft Development Consent Order [dDCO]. There are crossovers given the nature of some of the matters raised.
- 1.1.5 FBC acknowledges on balance, that many issues relating to the dDCO could be addressed through the Examination. However, we are raising substantive matters and concerns relating to the ES.
- 1.1.6 FBC is concerned about the inadequacy of the ES incompleteness and/or its inconsistencies. This has also been raised by other parties. FBC raised concerns relating to this during the Preliminary Hearing and Issue Specific Hearing 1.
- 1.1.7 Despite this and as advised, FBC has prepared its LIR alongside the preparation of the Relevant Representations for Deadline 1. In doing so FBC recognises the applicants are entitled to seek flexibility in their approach but refers to the requirements as set out in Sections 2.6 of EN-3 and 4.3 of EN-1. Our concerns are explained further in the relevant sections of this report.
- 1.1.8 For clarity, FBC considers the ES as presented has not assessed full impacts and reasonable alternatives, and has not engaged fully with the EIA Regulations and the 2017 Wildlife and Habitat Act.
- 1.1.9 FBC reserves its position on these matters and requests the Examining Authority [ExA] require further information from the applicants to ensure the nature and extent of all impacts can be properly assessed and understood. We also request that appropriate opportunity and reasonable time is given for FBC and other parties to respond to any further information as and when it is supplied by the applicants throughout this process.
- 1.1.10 All parts of the content of this LIR is the work of the officers of Fylde Council and no part of it has been generated by AI.

2. Policy Context

2.1 National Policy and Guidance

- 2.1.1 The National Planning Policy Framework [NPPF] is a material consideration for the assessment of NSIPs and as such has been referred to as appropriate within this LIR. There are a number of National Policy Statements which are relevant to the assessment of NSIPs, the most pertinent being EN-1, EN-3 and EN-5.

2.2 The Development Plan

- 2.2.1 The Fylde Local Plan to 2032 (incorporating Partial Review) [FLP] is the extant plan. The relevant policies are referenced throughout the LIR as appropriate and in response to a request, a supporting policy assessment summary is attached as Appendix 1 to this report.
- 2.2.2 FBC has published its Local Development Scheme 2025 which sets out a programme to produce the next Local Plan as the existing Local Plan will be five years old from adoption in December 2026.
- 2.2.3 Initial stages of preparation of the new plan have commenced, including the issue of a call for sites. It is intended to undertake a Regulation 18 consultation in August-September 2025, with consideration of sites through the Strategic Housing and Economic Land Availability Assessment to run from May to October 2025, publication for consultation under Regulation 19 stage May-June 2026, with submission proposed for August 2026.
- 2.2.4 The new plan will run to 2042, ten years on from the existing Local Plan. FBC's intentions are that the new plan will incorporate existing policies wherever possible, subject to the outcomes of the Regulation 18 stage and national policies changes.

2.3 Other Affected Boroughs: Preston City Council and South Ribble Borough Council

- 2.3.1 The Central Lancashire authorities, Preston, South Ribble and Chorley, have been working together to produce a joint plan. The Central Lancashire Local Plan 2023-2041 Publication Version was published for Regulation 19 consultation between 24th February 2025 and 14th April 2025. A link to the Regulation 19 documents webpage is included in Appendix 3 to this LIR. The Local Development Scheme gives a date for submission for examination of June 2025, with adoption targeted for between July and December 2026. The published plan sets out a housing requirement of 23,652 homes between 2024 and 2041 across the three boroughs, made up of 9,360 in Preston, 8,280 in South Ribble and 6,012 in Chorley.
- 2.3.2 The three local authorities have separate adopted Local Plans; all three were adopted in 2015. Preston also has a city centre plan adopted in 2016. Links to the existing plans for the authorities directly affected are provided in Appendix 3 of this LIR.

3. Assessment of Impacts

3.1 Structure

3.1.1 Notwithstanding FBC's position expressed above, in the interests of consistency and to assist the ExA, our assessment has been arranged with reference to the list of matters covered in Issue Specific Hearing 1 with additional matters emphasised in italics below.

3.1.2 These are as follows:

- Draft Development Consent Order
- Offshore Ecology
- Traffic and Transportation
- Aviation
- Agricultural Land
- Flood Risk, Hydrology and Drainage
- Onshore Ecology and Biodiversity Net Gain
- Onshore Heritage and Archaeology
- Landscape and Visual Effects
- Local Business and Tourism
- *Risk Management and Resilience*
- *Human Health and Recreation*
- Interrelationships and Cumulative Effects
- *Mitigation Through Section 106 Contributions*

4. Draft Development Consent Order

4.1 Scope of Works

- 4.1.1 Within the dDCO, the range of works permitted is broad and loosely defined; it is likely that any subsequent dDCO would not be an effective in securing the works in accordance with the ES.
- 4.1.2 For example, Pages 54 and 55 of the dDCO [APP-005] following work area 54B grants consent for a wide range of associated works which could be permanent and go beyond the scope of the assessments accompanying and prepared in support of the draft dDCO and which could go beyond the defined work areas.
- 4.1.3 Furthermore, page 54 of the dDCO relies upon the following definition for the scope of works: *"(...) other works (...) which fall within the scope of the work assessed by the environmental statement"*
- 4.1.4 FBC position is the dDCO should define the scope of works and the ES cannot and should not be relied upon in this regard. This reduces the clarity of what is proposed and the ability of the Interested Parties to assess the impacts, which gives rise to issues relating to the nature, timing, duration and frequency of impacts.
- 4.1.5 This is fundamental point, in that the assessment of likely impacts arising from the proposed development, (and as set out within this LIR) are less precise, less accurate or certain with the likelihood and degree of risk and resulting harm increasing without justification.

4.2 Timing, Duration and Frequency

- 4.2.1 A recurring theme made by FBC and other interested parties relates to the fact that there are no suitable controls with regards to the timing, duration and frequency of works, including construction and decommissioning.
- 4.2.2 Design and the preferred programme for construction, phasing and decommissioning will have a significant bearing on the severity and longevity of impact for receptors, across all topic areas.
- 4.2.3 This includes many where such matters are critical, such as those relating to (but not limited to) impacts on agriculture, tourism, landscape, ecology and transport. Topic-specific matters are discussed primarily with reference to the ES later in this LIR.

4.3 Construction of On Shore Trenches

- 4.3.1 The phraseology of the dDCO sections describing the works to be permitted is enabling, stating in each case: *"[Project] onshore cable works at [location] including [specific works]"*.
- 4.3.2 This does not restrict in any way the types of works undertaken within the identified area, other than to have the objective of (in this case) laying cables. As it stands sections which state *"including"* where trenchless installation technique works or direct pipe works have been specified do not restrict the development to using these (or any other) method.
- 4.3.3 No methodology statements have been provided by the applicant for critical key cross sections such as sand dunes/road-rail crossings/ditches-dykes and other sensitive locations.

- 4.3.4 Although it is reasonable that one of the specified methods must be used, this could be satisfied by using the specified method for only a short length, with an alternative unspecified method such as open trenching used for the remaining length. In FBC's view this could and is likely to leading to harmful impacts which have been not assessed in the ES.
- 4.3.5 The likely impact is that without more specific and restrictive wording, the works could give rise to a range of harmful impact which have not been understood, assessed or appropriately mitigated.

4.4 Restoration

- 4.4.1 The dDCO does not specify restoration of land to the existing condition anywhere within the list of works. Requirement 16 in Schedules 2A and 2B is inadequate in preventing this as it only refers to land used temporarily and not defined.
- 4.4.2 The likely impact is that the absence of any such requirement leads to problematic assessment about the final form of the land, particularly where permanent access and construction compounds are specified.
- 4.4.3 In relation to sensitive sites, FBC considers that this could lead to permanent local impacts and gives rise to specific policy conflicts and concerns.

4.5 Draft Development Consent Order Summary

- 4.5.1 Whilst it is acknowledged that consideration will most likely be given separately to the ES and dDCO, FBC is of the opinion that a number of these matters and issues are interrelated and whilst matters can address deficiencies in control and parameters in the dDCO, The same approach cannot be applied to the ES.

5. Offshore Ecology

- 5.1.1 FBC considers that matters relating to offshore environmental effects will largely be addressed by other bodies, notably Natural England and the Marine Management Organisation.
- 5.1.2 However, on one specific issue, FBC notes that the proposed routing would run through the Fylde Marine Conservation Area and the Shell and Flat Lune Deep area, these being sensitive areas of constraint.
- 5.1.3 There is a route further to the north which avoids both areas and other sensitive areas as identified by the applicant. Without proper assessment of alternatives, the likely impact is that harm would be increased without proper justification, FBC seek further detailed explanation as to why the preferred route was chosen.

6. Traffic and Transportation

- 6.1.1 FLP Policy INF1 sets out a requirement to minimise negative impacts on the quality of existing infrastructure. Furthermore, infrastructure plays a vital role in supporting business and tourism, and particularly the visitor economy.
- 6.1.2 FBC relies upon Lancashire County Council as Highway Authority for matters relating to traffic and transport effects and has liaised with the Highway Authority in preparation of our LIR. FBC understands that the Highway Authority will provide detailed comments at Deadline 1 and has reviewed a draft version of these comments.
- 6.1.3 Consistent with all other topic areas, the key issue relates to the ES, its supporting documents and its deficiencies. There is a lack of evidence to support the suitability of much of the proposed route(s), and to demonstrate that the proposals are safe and highways matters can be dealt with.
- 6.1.4 The lack of detail around the timing, phasing duration and frequency of closures and diversions means that the potential impacts cannot be properly understood and assessed.
- 6.1.5 In terms of impacts on highways, this has the potential to have very broad impacts. With reference to risk, closures impact upon emergency access, whether in terms of access to utilities or the movement of vehicles. Businesses will be impacted in terms of movement of goods, staff and customers. Residents will be impacted, particularly given that some proposed closures would sever access to some dwellings, for example at Leach Lane and The Hamlet.
- 6.1.6 Cycle routes would also be impacted, including the Guild Wheel which is a major cycle infrastructure route connecting to key routes within Fylde, supporting commuting, the environment, health and tourism activities.
- 6.1.7 Similarly, the development would impact upon 21 Public Rights of Way (PROWS) within Fylde. These impacts are discussed in more detail in the 'Human Health and Recreation' section later in this LIR. In summary, lack of details about the timing, phasing, duration, frequency and nature of the closures and diversions mean that the impacts cannot be properly assessed and managed.
- 6.1.8 The use of more sustainable travel options such as cycling and walking rely upon the availability, safety and reliability of these options, in encouraging people to limit car use. Improper managed diversions and closures will dissuade people from using these more sustainable transport options.
- 6.1.9 The likelihood is, without proper baseline analysis and subsequent analysis and formulation of mitigation and management, the negative impacts on existing infrastructure could not be properly minimised. No justification for this approach is presented.

7. Aviation

- 7.1.1 Aviation plays a significant role in Fylde, with Blackpool Airport and Warton Aerodrome both being strategic infrastructure of regional and national importance. Whilst matters relating to the business impacts of the proposals as they affect these sites are dealt with under the 'Business and Tourism' heading of this LIR, this section considers other matters.
- 7.1.2 FLP Strategic Policies EC4 and T2 and set out requirements and limitations for development, with specific reference to aviation. Policy T2 includes a specific restriction that development would not be permitted unless it could be demonstrated that there would not be any potential for adverse impacts on aviation operations, or on defence navigation systems and communications.
- 7.1.3 The proposed development includes works within the Blackpool Airport Enterprise Zone, as well as ecological mitigation works within the 13km buffer zone around Warton Aerodrome.
- 7.1.4 These elements of the proposals are relevant because they have the potential to give rise to harmful impacts. For the airport, this is in terms of affecting operations, including direct impact on a runway. For the aerodrome, this includes ecological mitigation works which have the potential to alter and increase bird activity, potentially giving rise to increased bird strike risk.
- 7.1.5 These matters (with others) were discussed by representatives of both organisations during the Preliminary Hearing and Specific Issue 1 Hearing. In both instances, this included raising concerns about there being insufficient detail in the ES to properly assess the impacts.
- 7.1.6 The likely impact is that there is the potential for harm to aviation activities at both sites and therefore conflict with FLP Strategic Policies EC4 and T2.

8. Agricultural Land

- 8.1.1 The main land use in Fylde, in terms of land area, is agriculture. This is due to the significant areas of Grade 2 (which is very good quality land) and Grade 3a agricultural land (which is good quality land). Fylde has no areas of Grade 1 agricultural land, but around 50% of the Borough is classified as Grade 2, and a further 34% as Grade 3a (FLP Section 2.2).
- 8.1.2 The use of this land supports extensive agriculturally based supply chains, principally associated with small and medium sized farm holdings and agriculture-based enterprises.
- 8.1.3 FLP Strategic Policy DLF1 sets out that development will not be permitted which would prevent or undermine the operation of existing land uses.
- 8.1.4 More specifically, FLP Policy CL3 does not support renewable energy development on Grades 1, 2 and 3 agricultural land, with the exception that *“it is demonstrated that poorer quality land could not be used instead, and that the benefits of the development outweigh the economic and other benefits of the best and most versatile agricultural land and any other adverse impacts of the proposal”*.
- 8.1.5 The applicant has indicated that a ‘Black Red Amber Green’ [BRAG] assessment has been used to assess and minimise impacts in relation to several constraints, including land classification.
- 8.1.6 However, FBC considers that this is inappropriate, as the assessment presented in the Selection and Refinement of the Onshore Infrastructure [APP-033] gives the same weight to harm arising from developing on both Grade 2 and Grade 3 agricultural land.
- 8.1.7 It is reasonable to assume as a starting point, a route(s) could run across a greater proportion of Grade 3 land, thereby reducing impact on better quality Grade 2 land by using poorer quality land instead. A balanced and justified assessment on this basis has not been considered or assessed.
- 8.1.8 The likely impact and degree of impact arising from temporary or permanent loss of high-quality agricultural land as proposed will increase with no reasonable alternative assessment.
- 8.1.9 Proposals include the temporary loss of agricultural land to facilitate the buildout, although the timing, duration and frequency are not specified. The absence of proper phasing information does not enable a proper assessment of the impacts to be carried out.
- 8.1.10 Specifically, Page 35, ES Volume 4 Chapter 2 on Socio-Economics [APP-141] defers all assessment of potential impacts on agricultural land to ES Volume 3 Chapter 6 on Land Use and Recreation [APP-104]. This in turn summarises the impacts in Table 6.25, identifying agricultural land as having an “up to high” sensitivity but only categorising the “temporary loss” as having a negligible impact, based on a scope at 6.11.2.4 of “more than five years” but without limit.
- 8.1.11 This defers mitigation to commitments CoT35 and CoT81, to the Outline Code of Construction Practice [APP-193] and Outline Soil Management Plan [APP-200] respectively. With each of these then deferring any control to work to be completed at a later date, with the former including a commitment at 1.7.5.1 to “maintain the quality of agricultural land and land holdings” and responsibility passed to principal contractors.

- 8.1.12 FBC considers that in order to maintain the quality of agricultural land, land holdings and their use, details must include the nature, timing, duration and frequency of impacts to the land/location in question.
- 8.1.13 There are also a significant seasonality matters which have also not been assessed. Allowing for an open-ended period of works exceeding five years should not be considered to have negligible impacts.
- 8.1.14 In FBC's view the ES does not include proper consideration of operation and decommissioning which would likely give rise to temporary impacts on agricultural land. Therefore, the impact cannot be properly understood and the likely impacts and harm to local agricultural businesses and supply chains would be increased. Extended and repeated periods of impact would cause permanent closure of some businesses, where this harm could otherwise be reduced and closure avoided.
- 8.1.15 The proposed development also includes other permanent impacts on agricultural land, notably relating to the substations and ancillary development but also in terms of the junction boxes.
- 8.1.16 The total land coverage of both substations is extensive; there is no clear justification provided in the ES for the need to have two separate substations. The likely impact is a greater amount of agricultural land would be lost without justification.
- 8.1.17 With regard to junction boxes, the details of the size, number and general location of the junction boxes have not been provided. This contributes to overall uncertainty around the potential impacts and makes it harder for agricultural businesses to plan and mitigate impacts arising from the development.
- 8.1.18 The likely impact is that the harm arising from the loss of land to the junction boxes, although likely to be small in area and spread out, it will nevertheless be increased.
- 8.1.19 With regards to the above impacts on agricultural land, each of these impacts will affect compliance with Policies EN-1, EN-3 and FLP CL3 because they are likely to increase the magnitude of the harmful impacts as assessed when against the benefits of the development.
- 8.1.20 The lack of information regarding timing, phasing, methodology, duration, frequency and nature of these impacts is problematic. The applicant has not set out any details of proposed beneficial impacts on agricultural land as it is not anticipated that there would be any beneficial impacts to agricultural land arising from the development.

9. Flood Risk, Hydrology and Drainage

- 9.1.1 FLP Strategic Policy CL1 sets out a requirement for all development to minimise flood risk impacts on the environment, to retain water quality and efficiency and to mitigate against the likely effects of climate change on future generations. At a high level FBC recognises the role that low carbon and renewable energy can play in mitigating the likely effects of climate change.
- 9.1.2 With regards to water management matters, FBC relies upon Lancashire County Council as Lead Local Flood Authority, as well as other statutory bodies, and notes the submissions made so far in this capacity. However, there are a number of important matters to note and highlight.
- 9.1.3 Firstly Fylde is a coastal area, the Fylde Coast Authorities Level 1 Strategic Flood Risk Assessment (SFRA) 2024 [SFRA] setting out that the entire coastline to be at tidal flood risk. Specifically, the dunes area provides flood defence for a section of the coastline, with capital funding from the Environment Agency to maintain and accrete them.
- 9.1.4 FBC is concerned that the proposed works in the dunes area may harm the effectiveness of the dunes and flood defence and considers that the lack of detail about the works in this area means that the potential impacts cannot be properly understood and assessed. The likely impact is that the risk of flooding will be increased and that use of resources (both in terms of funding and activities) will be made less efficient.
- 9.1.5 Also areas of Fylde are susceptible to ground and surface water flooding, with some ground types being relied upon to hold significant amounts of water. The lack of specific details around the nature, timing, duration and frequency of works, as well as details around built infrastructure, means impacts on surface water management cannot be properly understood and assessed.
- 9.1.6 NPPF supports a risk-based and sequential approach to development and flood risk, so that development is in the lowest flood risk areas where possible. The lack of sufficient detail and justification in the applicants' ES means it is not possible to assess whether the development would minimise flood risk impacts.

10. Onshore Ecology and Biodiversity Net Gain

10.1 Introduction

10.1.1 The principal concern in respect of biodiversity is the scheme will result in the loss and disturbance of habitats, including those of national and international importance. The loss of habitats has the potential to result in the loss of or disturbance of breeding, sheltering, hibernating, foraging, commuting and dispersal habitats of priority or protected species. Lancashire County Council and Natural England have provided a comprehensive response to the proposals, which FBC fully supports and further comments on specific issues are provided below.

10.2 Coastal Management Area and SSSI

10.2.1 The development would affect the area of sand dunes to the east and west of Clifton Drive North, these fall within the Coastal Change Management Area defined by FLP Policy ENV1. This policy, along with NPPF paragraph 185, set out that development within Coastal Change Management Areas will only be appropriate where it would not have unacceptable impact upon coastal change.

10.3 Sand Dunes

10.3.1 The dunes are designated as the Lytham St Anne's Dunes SSSI. The protection of the dunes habitat is supported by projects undertaken by the Council's Ranger Service, which has been partially funded by Section 106 contributions from new housing development immediately to the north at the former Pontins site, as well as other capital funding.

10.3.2 The proposed development includes underground construction. However, the proposals do not include sufficient detail to assess whether this could be achieved without damage and disturbance to the site.

10.3.3 FLP Policy ENV1 prevents development within the area, unless seven criteria are all met. These proposals fail to meet six of the seven criteria, only meeting requirement 'i' which relates to the exceptional need for a coastal location. The policy goes on to state that where development does occur, contributions will be sought for conservation, management and enhancement of important wildlife habitats and the creation of new habitats.

10.3.4 FLP Policy ENV2 states that where significant harm resulting from development affecting nature conservation sites cannot be avoided, adequately mitigated and or replaced or compensated, then planning permission will be refused.

10.3.5 Construction methods may provide significant mitigation if they can be adequately secured. However, this is not achieved through the dDCO as drafted.

10.3.6 Overall, any complete programme of measures should include significant contributions to allow the Council's Ranger Service to support mitigation measures over the longer term, if compliance with Policy ENV2 is to be achieved. In FBC view the ES does not contain specific detail to understand the likely impacts of the development upon the dunes.

10.3.7 Whilst this issue is a recurring theme throughout this LIR, it is of relevance here because the sand dunes are an extremely sensitive habitat and extremely vulnerable to disturbance and even more so to repeat disturbance.

10.4 Sand Lizards

- 10.4.1 A population of sand lizard occurs within the Order limits on dune habitat of the Ribble Estuary SSSI and Lytham St. Anne's Dunes SSSI. The applicants propose the installation of the export cables at Lytham St Annes Dunes SSSI will be undertaken using a direct pipe trenchless technique to pass cables beneath the foredune habitat in the Ribble Estuary SSSI. The Environmental Statement states that this area supports the majority of the sand lizard population.
- 10.4.2 Whilst the applicants acknowledge the potential for disturbance, as set out at the Relevant Representations stage, FBC considers the assessment carried out by the applicants is not up-to-date and regardless the likely impact of the development as presented is there is potential for significant harm to this protected species with no justification, protection or mitigation.

10.5 St Annes Old Links Golf Course

- 10.5.1 The St Annes Old Links Golf Course is locally designated (by Lancashire County Council) for biodiversity importance and as a "Biological Heritage Site" under Policy ENV2.
- 10.5.2 Policy ENV2 states that development that would directly or indirectly affect any sites of local importance will be permitted only where it is necessary to meet an overriding local public need or where it is in relation to the purposes of the nature conservation site.
- 10.5.3 The works proposed under Works nos. 8A/B involve underground tunnelling or trenchless construction, but as noted in the dDCO section, this restriction is ineffective.
- 10.5.4 There is also doubt about this approach on the basis that the overall lengths of underground boring through this and the adjacent works nos.6A/B and 9A/B are significant, and it would be expected that there must be breakout points that would result in impact during construction.
- 10.5.5 The likely impact is that FBC considers it is likely the development will give rise to adverse impacts with reference to FLP Policy ENV2.

11. Onshore Heritage and Archaeology

- 11.1.1 FLP Policy ENV5 sets out a requirement that development should conserve, protect and where appropriate, enhance the character, appearance, significance and historic value of both designated and undesignated assets.
- 11.1.2 With regards to listed buildings, the same policy further sets out that development which would result in the loss of significance or setting, will be refused unless the harm is justified by the public benefits of the proposal.
- 11.1.3 Similarly, where less than substantial harm would occur, this must also be weighed against the public benefits. Due regard has also been given to S66 of the Planning (Listed Building and Conservation Areas) Act 1990 and the national policy guidance contained in Chapter 16 of the NPPF.
- 11.1.4 The applicant has identified three listed buildings as being potentially impacted by the proposals and has awarded the 'medium sensitivity/value' whereas FBC considers a high level of value should be assigned to all three. For all three assets, this difference in opinion primarily arises from the contribution that setting makes to their significance. The applicant has attributed 'some' or 'limited' contribution from setting, whereas FBC considers that the setting makes a positive contribution in each case.
- 11.1.5 In terms of impacts, the applicant does not appear to have assessed the visual impacts arising from the proposed substations upon the Grade II listed Dixons Farmhouse (LEN 1072035) and adjacent Grade II Dagger Cottage (LEN 1164155).
- 11.1.6 Whilst they would be approximately 900m away, the landscape and its features, coupled with the proposed scale of the substations, mean that visual impact is likely and at the very least there should be an assessment of this impact.
- 11.1.7 Additionally, as details of the duration and frequency of the proposed build-out are limited, as are details around proposed landscaping and mitigation, it is not possible to properly assess the level of impact.
- 11.1.8 With regards to non-designated heritage assets, the applicant identifies several assets [APP-097] but the assessment of these is very limited or absent. The assets are classified only in terms of their distance from the cable corridor. FBC considers that further assessment should be carried out. For example, Leach Lodge Farmhouse and cobble wall (LLB9/PRN6198), a surviving constructed cop (LLB10) and Thursby Nursing Home (LLB5) are within the cable corridor, but no assessment of the potential impacts are presented.
- 11.1.9 FBC is very concerned that the proposed substations and associated development is close to Quaker's Wood Burial Ground (LLB22), no proper assessment of impact has been carried out, the application is not supported by a clear justification for the need for two substations, the size of those substations and their location close to heritage assets.
- 11.1.10 It is acknowledged that locally listed and non-designated heritage assets can attribute low significance, however a proper assessment must still be carried out. With regard to designated assets where significance can be higher, as it is, then the implications are more serious.

11.1.11 With regards to archaeology, FBC raised concerns in its relevant representations [RR-0705] that the baseline evidence, assessment and proposed monitoring and mitigation was not sufficient. This position is maintained.

11.1.12 Further to this, the uncertainty around the proposed works within the affected areas means that these impacts cannot be properly addressed. The cable routing, areas of above ground works and methods will alter the way in which below ground remains are impacted. Therefore, all potential development scenarios should be fully assessed. The likely impacts are that without sufficient details of the proposed build-out, operation and decommissioning, including details of the timing, duration and frequency of those impacts, harm will be caused to heritage assets, without proper assessment to enable that harm to be weighed against the public benefits.

12. Landscape and Visual Effects

12.1 Introduction

- 12.1.1 Fylde is characterised by its coastline and gentle undulating landscapes, with its largely attractive qualities helping to make Fylde a popular place to live, work and visit.
- 12.1.2 FLP Strategic Policy ENV1 sets out the requirements for development with regards to landscape, with Policy GD7 setting out more general principles of good design, including with specific reference to landscape in criteria d, e, h and m.
- 12.1.3 The Fylde landscape is unique in character and exhibits rare, regionally important landscape qualities which are interconnected with its biodiversity and ecological value. The landscape of the seafront and dunes and the rural, agricultural landscape beyond are high quality and highly valued by residents, those who visit the area and those whose livelihoods are linked to this landscape. By their very nature, these landscapes are changing and are very sensitive to external forces.
- 12.1.4 The proposed development would occupy a 17 km long tract of landscape between the point of cable landfall and the onshore substations, before crossing the River Ribble south towards the Penwortham substation.
- 12.1.5 The cable corridor itself will measure up to 100m wide and widening to 180 m wide at the Network Rail crossing and branching into two separate channels at a number of other sensitive locations.
- 12.1.6 The corridor crosses the following Landscape Character Areas identified by Lancashire County Council in their document A Landscape Strategy for Lancashire (December 2000):
- 15d Coastal Plain – The Fylde;
- 16b Mosslands – South Fylde Mosses; and,
- 19a: Coastal Dunes – Fylde Coast Dunes.
- 12.1.7 The proposed route also crosses the Ribble estuary RAMSAR site, SSSIs, semi-natural greenspace, Green Belt, open countryside and an Area of Separation, all of which are designated landscapes protected by strategic environmental policies set out in the FLP.
- 12.1.8 The landscape and visual impact assessment undertaken by the applicant [APP-123] concludes that through the avoidance of key receptors and by sensitive design, engineering and landscape mitigation, many of the landscape and visual effects resulting from the proposed corridor could be overcome and most visual impacts being localised and short term.
- 12.1.9 However, FBC is concerned about the lack of details concerning the timing, duration and frequency of those impacts. Details are absent and as a result, there exists an increased potential for these impacts to become long term or permanent. The ES and its conclusions are inadequate.
- 12.1.10 Whilst FBC accepts much of the proposed development apart from the sub stations would be below ground on completion of the works and as a consequence the longer-term visual effects could be minimised, this is dependent on the timing, phasing, duration and the frequency of construction and remediation and decommissioning.

12.1.11 The development will occupy a wide corridor which during the construction phase would include: the installation of temporary fencing; creation of areas of hard standing for up to 18 construction compounds, which will be lit during nighttime working; site clearance; construction of new junctions and temporary haul roads; excavation of open cut trenches; and stockpiling of soil and materials.

12.1.12 There is very limited detailed information regarding the timing, phasing, duration, frequency, design or locations of any of the above temporary works, as well as the permanent structures which would be required as part of the project.

12.2 Topography and Landscape

12.2.1 The topography of Fylde is generally flat land with limited tree cover, offering areas with longer and extended panoramic views.

12.2.2 The magnitude and longevity of these effects on views and the landscape character will be dependent upon the timing, duration, frequency, design and intensity of the proposed temporary and permanent development.

12.2.3 The proposed site for the landfall of the transmission cables on the seafront between Blackpool and St Annes-on-the-Sea is in an area of particularly high landscape sensitivity and within the Coastal Change Management Area defined by FLP Policy ENV1.

12.2.4 This policy prevents development unless seven criteria are met, including that it *“is appropriate and in keeping with the open character of the coastline.”* And forms part of a nationally important ecological site and biodiverse resource which is highly valued. It is also an important local asset fundamental to the experiential landscape of the beach.

12.2.5 The proposals include temporary closure of parts of the beach, along with temporary structures, plant and storage associated with the build-out phase.

12.2.6 Whilst FBC considers that the natural topography of the site could provide some mitigation of some of the visual effects and the prolonged effects on landscape character could be mitigated in part by the trenchless installation beneath the dunes.

12.2.7 However, disturbance during construction would undoubtedly have implications for the tranquillity of the beach front, the biodiversity of the dunes and their subsequent restoration. Risks associated with the construction methodologies can only be estimated and the potential for long-term change is high.

12.2.8 The installation of the transition joint bays on the beach would also introduce a significant discordant manmade features that are likely to bring about long term negative visual and landscape impacts.

12.2.9 Along the transmission corridor, the introduction of built elements, particularly the two proposed substations, would fundamentally alter the long-term character of the local rural landscape and available views across it from settlements, isolated dwellings, roads and footpaths, introducing discordant, urban elements into otherwise open or agricultural landscapes.

12.2.10 The cumulative effects are likely to have a significant negative impact on some views where the structures are seen together and/or in succession as receptors move through the landscape.

12.3 The Sub Stations

- 12.3.1 Specifically, the two proposed substations would be located within the area designated as an Area of Separation in FLP Policy GD3, this would significantly weaken the policy's ability to preserve the character and distinctiveness of the individual settlements of Newton with Scales and Kirkham.
- 12.3.2 Having regard to this policy and to the general principles of good design required by FLP Policy GD7 the applicants should have provided details so that the ExA, LPA and local communities could understand and assess whether the design of the proposed substations from the surrounding areas could be managed and/or mitigated. However, the applicants have not assessed impacts thoroughly in the ES and the dDCO as drafted does not provide sufficient control.
- 12.3.3 There is also limited information available regarding the substations construction phasing and delivery. It is imperative that the design and impacts of the substations themselves and the enclosures be examined as part of the mitigation process, with innovative and considered modifications to the design, footprint and height of the facilities.
- 12.3.4 It is FBCs firm opinion the likely impacts of the substation proposals would give rise to permanent unacceptable long distance and localised landscape harm and the ES is inadequate in its assessment.

12.4 Trees and Hedgerows.

- 12.4.1 A review of the Tree Survey and Arboricultural Impact Assessment reports [APP-128 and APP-129] shows that more than 60 mature trees and 69 hedgerows that would be completely or partially removed as a result of the proposed development. However, conflicting information exists with regards to restoration this is a concern.
- 12.4.2 In places documents refer to restoration with like for like, other instances refer to restoration with species rich hedgerows, phrases such as 'wherever practicable', 'subject to landowner agreement', 'may' or 'might' are used to detail potential restoration.
- 12.4.3 In FBC view repeated works will be more likely to cause long term damage to the more fragile landscapes, such as the dunes and Fen Carr remnants which will not be mitigated successfully. Importantly sequential installation would prolong the visual and physical landscape disturbances.
- 12.4.4 Whilst the proposals for installation, mitigation and enhancement of the physical and visual effects of the scheme could improve some visual appearance of the proposal in the rural environment and reduce adverse effects on the landscape character. FBC considers that it is likely that there would still be resultant significant residual effects on the landscape. The likely impacts are that the development would result in a long-term change to the appearance and use of the land along the transmission corridor, and consequently permanently alter the characteristics of certain parts of it.
- 12.4.5 The effects of the proposed development would also impact on drainage and the water table, and in turn would impact upon the native flora and fauna. This, alongside the creation of exclusion areas, where existing land management practices are restricted and the removal of existing trees and woodland, even if temporary but over an extended period of time would result in specific changes to the landscape character and views.

12.5 Methodology and Approach

- 12.5.1 Requirements for assessing the effects on landscape and visual matters are primarily set out in Section 5.10 of EN-1. This includes specific reference in 5.10.4 to the fact that effects arise not only from the sensitivity of the landscape but also from the nature and magnitude of change proposed. Paragraph 5.10.6 goes on to state that the aim should be to minimise harm to the landscape, with 5.10.22 requiring that landscape impacts of emissions from construction and operational activities should be considered. Specific guidance for decision making included at 5.10.36 refers to consideration of temporary impacts and associated timescales of those impacts.
- 12.5.2 Importantly the ES does not carry out an assessment in accordance with the requirements and principles set out in EN-1. It is not clear on what basis the applicants have carried out an appropriate assessment of landscape impacts in the ES.
- 12.5.3 The Landscape and Visual Impact Assessment Methodology [APP-127] does not include a full explanation, for example in defining what is meant by a temporary impact and justifying no more nuanced consideration of timing (including with reference to seasonality), duration or frequency.
- 12.5.4 The methodology [APP-127] as presented, asserts at 1.5.3.5 that duration and permanence are considered but without explanation. The only potentially relevant element is at 1.1.2.7 where reference to the maximum design scenario set out in Table 10.18 of the main associated ES chapter [APP-123]. With regards to maximum duration of impacts, Table 10.18 simply sets out the following:
- Construction phase: sequential construction as this presents the longest potential construction phase.
 - Operation: 35 years.
 - Decommissioning: the justification is the same as that set out for construction.
- 12.5.5 All of the above suggests that the methodology is to consider the worst-case scenario. However, there is no element of the ES which models the impacts for these maximum durations for the draft order limit. It is therefore unclear and a concern to FBC as to what basis the landscape and visual impact assessment has been carried out.

12.6 Green Belt

- 12.6.1 FBC considers the justification for development within the Green Belt has not been properly assessed. FBC has due regard to Section 5.11 of EN-1 which states that there is a general presumption against inappropriate development in the Green Belt, and to NPPF Paragraph 160 which specifies that elements of many renewable energy projects will comprise inappropriate development within the Green Belt and therefore requires that very special circumstances are demonstrated.
- 12.6.2 NPPF Paragraph 153 sets out that very special circumstances will not exist *“unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”* Further guidance is presented in PPG Paragraph: 013 Reference 64-013-20250225, which advises that issues such as duration, remediability and the degree of activity may be relevant consideration.

- 12.6.3 FBC considers that the applicant has not properly justified the need of the Green Belt location for the substations. The information in the ES relies heavily on availability of the land in justifying the selected site. Similarly, FBC considers that the need for two substations and the size of those substations has not been properly justified, with specific reference to the Green Belt tests.

12.7 Landscape Summary

- 12.7.1 The likely impacts are that harm, including long term and permanent harm, would be caused and that significant and critical parts of the proposed development would not be appropriate to the landscape character, amenity and tranquillity in which it is situated.
- 12.7.2 The methodology presented in the ES does not fully assess the impacts of the proposals. Additionally, the proposals would include inappropriate development within the Green Belt which has not been justified. The harm which would be caused cannot be properly weighed against the public benefits as the application is not supported by sufficient details to enable this weighing up.

13. Business and Tourism

13.1 Introduction

- 13.1.1 The Fylde coast is one of the dominant features of the Borough. The largest towns, Lytham and St Annes, together have a strong reputation as a high-quality resort with their significant visitor attractions along with their distinctive seafronts and an internationally famous championship golf courses.
- 13.1.2 Other significant settlements are Warton and Freckleton, lying further east, and Kirkham and Wesham, which together form the only sizeable inland settlements and contribute to strategic economic and infrastructure.
- 13.1.3 With a total of 3.067 million tourism visits worth more than £214 million in 2014, equating to 5% of all tourism visits to Lancashire, the Fylde Council area has a strong and consistent visitor offer that includes a variety of major events.
- 13.1.4 (FLP Section 2.4) Part of this offer are the natural assets such as the expansive beach, Lytham Green and surrounding rural areas, which appeal to walkers, cyclists and other visitors.
- 13.1.5 The economic functionality of the Fylde Coast sub region, in particular the western coastal area is apparent through the strong travel to work patterns and employment with a shared tourism and cultural offer, public sector administration and a shared infrastructure which includes access via the strategic highway and rail network, plus the coastal tramway.

13.2 BAe Systems Sites

- 13.2.1 Fylde is unusual in that there is a dominance of manufacturing employment (approximately 40%) with approximately 50% of workers commuting into the area. Most of these manufacturing jobs are based in the south of the borough at BAe Systems, Warton and Westinghouse, Salwick.
- 13.2.2 BAe Systems also has another site at Samlesbury just east of Preston and workers are often contracted to work at both sites, many therefore live in the wider Preston area. BAe Systems also attracts workers from much further afield, both nationally and internationally. (FLP Section 2.15)
- 13.2.3 The internationally and nationally significant Lancashire Enterprise Zone has been established jointly at BAe Systems, Warton and at BAe Systems, Samlesbury. The Lancashire Enterprise Zone at BAe Systems, Warton is focused on advanced engineering and manufacturing (AEM) including aerospace, automotive, nuclear and new growth areas including energy.

13.3 Blackpool Airport and Enterprise Zone

- 13.3.1 FLP Policy EC4 relates to the Blackpool Airport Enterprise Zone which makes land available for economic development purposes, including the area designated site ES5 by FLP Policy EC1 for employment uses following the relocation of aviation uses further onto the apron area. A masterplan has been produced under Policy EC4 which identified site ES5 as the “Knowledge Quarter”.
- 13.3.2 FLP Policy T3 states that the land designated as Green Belt within the airport will be safeguarded from non-airport development, unless there are overriding operational requirements that constitute Very Special Circumstances and which justifies development in

the Green Belt. This also requires development to be in accordance with the masterplan and includes a requirement to consult Blackpool Airport in relation to all developments within the safeguarding zone and implies that the views offered by Blackpool Airport should carry weight in assessing policy compliance.

- 13.3.3 A specific issue arising from the dDCO is that work areas 34A and 34B provide for permanent access on a specified route within the Enterprise Zone and across the crosswind runway. However, no clarity is provided on how to replan site ES5 will be addressed. This is raised as it is not simply a matter of dDCO drafting but rather relates to the extent and location of the proposed works, in this case conflicting with a specific allocation within FLP. That is to say that redrafting the DCO will not resolve this issue, as the proposals are relying on land which falls within the area allocated in the Local Plan. In FBC view there is a conflict between these elements and although FBC acknowledges that Blackpool Council would lead on this matter, it does give rise to material impacts with regards to the FLP.

13.4. St Annes Old Links Golf Course

- 13.4.1 Matters relating specifically to impacts at St Annes Old Links Golf Course are discussed in more detail under the 'Human Health and Recreation' heading in this LIR. In summary, the likely impacts that the development could undermine the Council's protections for the Links Golf Course as set out in FLP Policy EC6.

13.5 Foreshore and Dunes

- 13.5.1 In addition to restrictions arising from the Ribble and Alt Estuaries SPA and Ramsar site, and the Lytham St Anne's Dunes SSSI, the beach and dunes perform a very important function in terms of the visitor economy. FLP Policy EC6 sets out a specific requirement for the Council to promote beach leisure activities and coastal tourism, in recognition of the vital role that coastal tourism plays in underpinning the local economy.
- 13.5.2 The build-out phases of the development have significant potential to impact access to the foreshore and dunes. The applicants ES does not include details of the timing, phasing, duration, frequency and nature of the restrictions on access to the beach that would arise.
- 13.5.3 It is noted that the ExA have requested additional information from the applicants which would set out access management details. Without this information, the likely impacts can only be assessed as having the potential to harm the vital role that coastal tourism plays in the area.
- 13.5.4 A further specific issue relating to the access management plan not addressed in the submission and not raised during the ExA questions during the first week of hearing sessions relates to the Royal National Lifeboat Institution [RNLI].
- 13.5.5 The RNLI submitted Relevant Representations [RR-1899] in which it is set out that the lack of detail in the submission means that the potential impacts cannot be properly assessed and managed. Specifically, the slipway at Starr Gate is close to the works order area and there are concerns that access could be restricted. Whilst this falls outside of the FBC area, the impacts are relevant in that this slipway is at times used in relation to rescue and recovery right along the length of Fylde coast with lifeboats transported across the whole extent of the beach. FBC therefore considers any works and structures could have an operational impact on this service which has not been assessed.

- 13.5.6 The likely impact for assessment therefore is severe, in that the potential impacts cannot be properly understood and managed and could harm the availability and effectiveness of an emergency service, resulting in increased risk to life and wellbeing.

13.6 Blackpool Road Playing Fields

- 13.6.1 Matters relating specifically to impacts at Blackpool Road Playing Fields are discussed in more detail under the 'Human Health and Recreation' heading later in this LIR.
- 13.6.2 However in summary, the likely impacts are that loss of sports pitches without permanent compensatory provision would be in direct contravention to FLP Policies HW3, HW1 and ENV3; it would also be contrary to NPPF paragraphs 96, 98 and 104.

13.7 Agriculture

- 13.7.1 Specific matters and impacts relating to agricultural business impacts are discussed in more detail under the 'Agricultural Land' heading earlier in this LIR. In summary, the likely impacts of the development and disruption would be to harm agricultural land holdings and rural businesses in Fylde.

13.8 Local Business and Tourism Likely Impacts Summary

- 13.8.1 The rural landscape and attractive coastline attract many tourists to the area. FLP Section 8.22 (supporting text to Policy EC2) observes that alongside sustainable development, it is important to maintain the rural economy. At a high level, the likely impact of the proposed development is it will cause temporary and permanent harm to businesses and tourism, in a such a way that will impact sustaining and creating jobs.
- 13.8.2 The likely impact of the lack of detail around timing, duration and frequency, is that these impacts will be increased without justification. Specifically with regards to timing, these matters and in particular tourism are seasonal in nature and harm could be mitigated by planning around busy periods and events. The dDCO has limited detail in this regard and would allow for a wide range of potential development scenarios over an extended period of time, with the possibility of permanent harm being caused.
- 13.8.3 As discussed for example with reference to Warton Aerodrome, Blackpool Airport and agriculture, no assessments have been undertaken to assess the potential impacts on large strategically important specialist businesses, including their supplies chains, employability and potential effects on the local and regional economies.
- 13.8.4 FBC acknowledges whilst these effects are likely to occur during the construction/decommissioning phases of the development. The lack of broad parameters relating to construction phasing in the ES is a concern. FBC considers the basis of the economic assessment and associated impacts inadequate.
- 13.8.5 The FLP policies relating to ecology recognise the delicate nature of local environment with Policy ENV1 requiring that development would not detract from the tourism value or facilities along the coastline. All businesses small and large across all sectors benefit from the ability to plan to mitigate the range of impacts which can arise from disruption.
- 13.8.6 It is possible the proposal would likely deliver some positive impacts in terms of local employment and training, particularly during the build-out and decommissioning phases and in terms of management and maintenance during operation. However, beyond a very high-

level observation in this regard, the ES does not include specific strategies which would ensure that this positive impact and related social value commitments are not properly articulated and adequately captured

14. Risk Management and Resilience

14.1 Introduction

14.1.1 FBC recognises the strategic importance of renewable energy infrastructure. However, large infrastructure projects of this scale inevitably introduce a range of risks to the local environment, businesses, community and service resilience, particularly during the construction and decommissioning phases.

14.1.2 It is essential that such risks are not inadvertently defaulted to the local authority or local responders without appropriate resource, responsibility, or commitment from the applicant. FBC considers that there are four principal areas of concern, as set out below:

- Flood Risk and Water Management
- Emergence Preparedness and Incident Response
- Supply Chain, Contractor and Business Continuity Risks
- Monitoring and Reporting

14.2 Flood Risk and Water Management

14.2.1 The submitted Flood Risk Assessment [APP-074] acknowledges that elements of the project lie within Flood Zones 2 and 3 and identifies a number of surface water flood risks, including at onshore substations and along cable corridors. The applicants approach relies heavily on:

- Existing Environment Agency flood defences (some with unknown ownership, condition, or design standard of protection);
- Assumptions of “natural high ground” acting as flood barriers; and,
- Static climate change modelling (UKCP19 allowances) without dynamic reassessment mechanisms.

14.2.2 The dDCO does not include a commitment to adaptive management or periodic review of flood risk post-consent. The applicant has not clarified responsibility for monitoring or maintaining third-party assets that their flood risk mitigation relies upon. Furthermore, construction-phase flooding risks, especially temporary works and haul roads, may introduce unmanaged disruption without clear contingency planning.

14.2.3 In FBC view the likely impact of this approach is that there would be unmanaged and increased likelihood of issues arising from flooding, and disruption to businesses without exploration justification and control.

14.3 Emergency Preparedness and Incident Response

14.3.1 The applicant has provided an Outline Spillage and Emergency Response Plan [AS046-047]. Whilst this document is outline, it omits certain details which is required to properly understand the likely impacts of the development. This includes the mission of:

- Site-specific risk scenarios;
- Defined incident leadership, ownership and escalation pathways;

- Formal integration with the Lancashire Resilience Forum, Fylde Borough Council, or other relevant responders; and,
- Any reference to performance standards, such as response times, equipment readiness, or resource availability.

14.3.2 The reliance upon generic guidance is not sufficient for a dDCO, or ES Assessment. The likely impacts are that requirements and limitations around emergency preparedness and incident response have not been properly understood, and therefore in FBC view have not been adequately assessed and as part of resilience/risk management procurement and design.

14.4 Supply Chain, Contractor and Business Continuity Risks

14.4.1 The applicants have submitted a Commitments Register [AS-030] which defers controls such as spillage prevention, pollution control and emergency planning to future detailed design. However, as part of this initial assessment, there is no clear evidence of consideration of the need for supply chain resilience assessments; business continuity arrangements for contractor and subcontractor failure; or, contingency measures should critical infrastructure fail.

14.4.2 As FBC understands it, no principal/tier 1 contractors have been appointed, therefore limited design input therefore into design parameters which is a recognised best practice for large scale infrastructure procurement. FBC have raised this matter directly with the applicants. However, at this stage this remains a significant risk which has not been properly assessed in terms of impacts. It is unclear to FBC what contingencies have been modelled in relation to contractor involvement in design and operation processes.

14.4.3 The likely impacts of these omissions are there could be delayed or ineffective response to serious incidents, with potential harmful impacts on local services, businesses and the Fylde's economy. Changes in design through the procurement process could have additional effects. This is understood but what is not clear is how these risks have been assessed.

14.4.4 As noted, there are a number of important regional/national/international businesses and supply chains located on the Fylde peninsula. These businesses have specific requirements when it comes to managing resilience. It is unclear whether these matters have been understood and assessed by the applicants. The lack of involvement gives rise to an increased likelihood of design changes with resultant impacts on assessment processes.

14.5 Monitoring, Reporting and Decommissioning

14.5.1 The applicants have provided no details of or commitment to ongoing risk monitoring or reporting post-consent and/or decommissioning processes. The likely impact is that there would be a reduced ability to adapt to emerging risks such as climate change, market shift, innovation and technology improvements.

14.6 Risk Management and Resilience Summary

14.6.1 FBC acknowledges the intention set out by the applicant to address environmental and community risks and that design is an iterative process. However FBC considers that the current proposals lack sufficient detail, assessment and control as evidenced in key areas.

14.6.2 The likely impacts of the development would be that the risks associated with the project would not be properly owned, managed and resourced by the applicants. This in turn would

likely give rise to harmful impacts on the local authority, local emergency services, economy, environment and communities and businesses.

15. Human Health and Recreation

15.1 Introduction

- 15.1.1 NPPF Section 8 concerns promoting healthy and safe communities, setting out a general requirement for decisions to aim to achieve healthy places. Specifically, NPPF Paragraph 98 includes that decisions should take into account and support the delivery of local strategies to improve health. FLP Section 10.5 sets out that there is a general need to maintain levels of physical activity in adults and children and notes that the area houses a high proportion of people aged over 65, with some not in good health.

15.2 Public Rights of Way

- 15.2.1 As well as setting out general principles and strategies relating to healthcare provision, FLP Policy HW1 includes a specific requirement to promote healthy lifestyles and to develop a network of cycling and pedestrian routes. The proposal would impact upon 21 Public Rights of Way within Fylde.
- 15.2.2 The submitted Outline Public Rights of Way Management Plan [APP-106] sets out that trenchless techniques, managed crossings and temporary diversions would be used. However, there would be permanent impacts to footpaths close to the Morecambe Substation in the form of a gated crossing. The outline management plan further sets out that the majority of impacts would be mitigated as a result of trenchless techniques being employed, with no further action required.
- 15.2.3 However, the ES is not based upon a proper assessment of the timing, duration and frequency of these impacts, nor considers subsequent controls to ensure harm is minimised. As a result, rather than contributing to the development of networked cycling and pedestrian routes to support a healthy lifestyle, the development could likely cause harm to the function of the existing networks over a long period of time, giving rise to harmful health, accessibility and economic impacts.

15.3 Playing Pitches

- 15.3.1 FLP Policy ENV3 protects open space including sports and playing pitches and cross-refers with national policies. NPPF paragraph 104 protects sports pitches unless they are demonstrably surplus, replaced by equivalent or better provision or the development is for alternative sports use.
- 15.3.2 Policy HW3 Protection and Provision of Indoor and Outdoor Sports Facilities protects indoor and outdoor sports facilities unless the tests in the NPPF are met. Paragraph 98 of the NPPF states that decisions should guard against the unnecessary loss of valued recreational facilities.
- 15.3.3 The proposed development would utilise two areas of Blackpool Road Playing Fields under works areas 51A, 51B, 53A and 53B to provide construction compounds and permanent access, as well as cabling that could be laid with open trenching, resulting in the loss of sports pitches.
- 15.3.4 The dDCO includes no commitment to restoring these pitches and insufficient details to understand whether the permanent access requirements would be compatible with the ongoing use of the site for sport and its effects on the community.

- 15.3.5 Importantly this is not considered to be an issue which could be addressed by appropriate drafting of the DCO but rather relates to fundamental issues in terms of the location and nature of the proposed development. As the Blackpool Road site is an important site for local participation in sport: it is the base for St Annes FBC (which has 46 teams) as well as other clubs operating there.
- 15.3.6 FBC has programmed a scheme to improve drainage on the Blackpool Road site; the existence of the current proposal will create a difficulty for the Council in assessing whether it should press ahead with the scheme, or abandon it pending the outcome of the application or the completion of the cabling. The prolonged period allowed for potential construction significantly compounds this. Whilst FBC understand that the applicant is in talks with representatives of the sports clubs, FBC also has an interest and landowner and in terms of the Local Plan requirements.
- 15.3.7 Whilst it is acknowledged that Sport England is a non-statutory consultee for NSIPs, it is listed as being a non-prescribed consultee under the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, described as being a relevant organisation. On this basis, FBC has been further guided by Sport England, who have raised objection to the proposals.
- 15.3.8 While a pragmatic approach could be taken to temporary impacts on playing fields, the acceptability of such proposals should be assessed on a case-by-case basis and will depend on the scope of the impact, its duration and the acceptability of any temporary mitigation proposals. If the affected areas of the existing playing fields are to be retained and restored post completion of the proposed works, then as part of any forthcoming submission documents the applicant should provide an agronomy report and full plan of works.
- 15.3.9 This work should also include an implementation timeframe for the pitch restoration works to be completed. The applicants should also provide details of the continuity of the existing sports use of/on the affected playing field and provide a scheme detailing the alternative provision for where these teams will play during the construction process. And should set out details of the size, location, type and make-up of the facilities or replacement facilities (as appropriate) together with arrangements for access.
- 15.3.10 The scheme must include a timetable for the provision of the facilities or replacement facilities (as appropriate). Without this information, it is not possible to properly assess the likely impacts of the development. There is clear potential for significant harm to be caused. The loss of sports pitches without permanent compensatory provision would be in direct contravention to FLP Policies HW3, HW1 and ENV3; it would also be contrary to NPPF paragraphs 96, 98 and 104.

15.4 St Annes Old Links Golf Course

- 15.4.1 FLP Policy EC6 provides specific protection for golf courses. St Annes Old Links Golf Course is a championship golf course, having hosted the final qualifying for The Open on several occasions and as recently as 2022.
- 15.4.2 The golf course is a key contributor to appeal of the local area for recreational golf, business and tourism, this includes the Royal Lytham & St Annes Golf Club which is one of the courses in the Open Championship rotation and is hosting the Women's Open Championship next year.

- 15.4.3 The works proposed under works areas 8A and 8B involve underground tunnelling or trenchless construction. The dDCO is not restrictive enough in terms of ensuring underground tunnelling or trenchless construction are used. FBC acknowledges that this issue could be addressed by redrafting the DCO but has reservations about whether this would be possible, with reference to proposed permissive approach to construction which the applicant is seeking as well as ES assessment and policy considerations.
- 15.4.4 Additionally, the overall length of underground boring through this and the adjacent work areas 6A, 6B, 9A and 9B is significant and it is assumed that there will be breakout points which would in turn result in impact on the function of the golf course.
- 15.4.5 Therefore, the likely impact is that the development undermine the Council's protections for the Links Golf Course as set out in FLP Policy EC6.

15.5 Fylde Coastline

- 15.5.1 FLP Policy EC6 states that *"The Council will plan for leisure, culture and tourism by: ... f) Protecting tourism, cultural, heritage and leisure assets, such as golf courses ...; h) Promoting beach leisure activities, coastal tourism and recreational events ..."*. The coastline plays a multifunctional role within Fylde, notably including in providing an attractive, accessible for place to exercise and recreate.
- 15.5.2 The lack of detail around the nature, timing, frequency and duration of the impacts upon the dunes and access to them, means that the impacts cannot be properly understood. The development would undermine the objectives set out in FLP Policy EC6 and therefore is contrary to the policy.

15.6 Human Health and Recreation Summary

- 15.6.1 The application is not supported by sufficient information to be able to assess the potential impacts to human health and recreation. Where impacts have been identified, the ES does not include appropriate proposals for mitigation or control measures.
- 15.6.2 Additionally, the applicant has not identified ways in which harm caused to human health and recreation could be mitigated through support of social value and local strategies to improve health and wellbeing.
- 15.6.3 The likely impacts are that the harmful impacts on human health and recreation cannot be properly assessed, mitigated and managed, thereby increasing harm without justification.

16. Interrelationships and Cumulative Effects

16.1 Introduction

- 16.1.1 Paragraph 4.1.5 of EN-1 requires that long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, should be taken into consideration when weighing the adverse impacts of the proposal against the benefits.
- 16.1.2 As set out throughout this LIR, FBC considers that for all topic areas, there is insufficient information and inappropriate analysis, such that the adverse impacts cannot be properly defined. This means that a balancing exercise cannot be properly carried out.

16.2 Clarification Required on Applicant's Works Plans

- 16.2.1 Further clarification is required in respect of the Works Plans as submitted. At present, the areas identified are considered wider than is necessary to facilitate the development. There is also a lack of clarity and confusion on the cable installation methods for different work areas/locations, which results in uncertainty over the potential impacts.
- 16.2.2 The separation of works into Projects A and B leads to a lack of clarity as to how the works associated with each project will be brought forward and their duration, including whether they will run in parallel or in series. Until confirmation of this can be provided, the full cumulative impacts of the projects cannot be quantified.

16.3 Other Schemes

- 16.3.1 Further information is required from the applicants regarding the cumulative impacts of both on- and off-shore wind farm projects upon the matters raised within this report.
- 16.3.2 Consideration should also be given to other committed developments in the area which are due or expected to be brought forward within the same timeframe. For Fylde, this includes the following:
- Application reference 24/0414 is a live application for a 49.9MW solar farm at Clifton Marsh Farm in Newton with Clifton, covering 69ha;
 - Application reference 24/0541 is a live application for a 28MW solar farm at land to west of Parrox Lane in Newton with Clifton, covering 32ha.
- 16.3.3 Furthermore, FBC is of the opinion that the in-combination effects of both the generation and transmission assets must be considered for all topics. The applicant has referenced in-combination effects to support its analysis of climate change impacts but has not carried out the same assessment for other impacts.
- 16.3.4 FBC is concerned about this approach, is not appropriate to be selective in this regard. If the decision is that the generation and transmission elements can be considered separately, then FBC is of the opinion that the principle of development should not be predicated on the existence of the generation application.

17. Mitigation Through Section 106 Contributions

17.1.1 It would be beneficial for the applicants to put forward a significant financial contributions package which is at scale to support nature recovery and green space projects to mitigate against the impact of the offshore wind farm development. The proposed mitigations as currently proposed are insufficient and inconsequential in their effect.

17.1.2 Such projects could include the following.

- **Fairhaven Lake Desilting Project and saltmarsh improvements.** A £700,000 designed scheme to remove sediment from the saltwater marine lake, repurposing the material to create retained in-lake edge wetland habitat. The project would restore lake water quality and prevent eutrophic conditions, enable the expansion of recreational activities and protect the site's built and natural heritage as a gateway site to the Ribble Estuary Ramsar/SSSI.
- **Fylde Sand Dunes Project** – A £1 million existing Environment Agency Project with a limited funded life of 5 years ending 26/27. Delivered by Fylde, Blackpool Council and Lancashire Wildlife Trust to protect the dunes as a soft sea defence and nationally important habitat for protected species. Match funding towards the project would facilitate the expansion of the existing project team to deliver further habitat conservation works, education and community engagement activities.
- **Blackpool Road Playing Fields** – Investment towards on-site parking to alleviate congestion because of football matches, combined with improved on-site youth and club house facilities would be attractive to the local community.

18. Conclusions

18.1.1 FLP Strategic Policy CL3 relates to renewable and low carbon energy, setting out that opportunities for such development should be maximised whilst ensuring that the likely adverse impacts are addressed satisfactorily. FBC fully acknowledges that the likely benefits of the scheme would relate to the following matters:

- Promoting clean and renewable energy.
- Reducing reliance on fossil fuels.
- Creating jobs and boosting economic growth.
- Contributing to environmental sustainability by reducing greenhouse gas emissions.
- Lowering air pollution.
- Providing security of supply.
- Facilitating cable access to two offshore wind farm applications.

18.1.2 FBC acknowledges the weight given to renewable energy as a public benefit. However, this depends on the specific nature of the proposed buildout, operation and decommissioning of the proposal, with reference to the broadest range of potential impacts. This is not only important for understanding the impacts of the development in order to be able to appropriately mitigate harm but also in terms of ensuring that any positive impacts arising can be used effectively.

18.1.3 The FLP and National Policy Statements require that adverse impacts be weighed against the public benefits. However, proposals must properly identify, assess and manage adverse impacts and the proposal's ES and supporting documents are in FBC view is deficient.

18.1.4 At a high level, the EIA has not been prepared to properly assess all scenarios and impacts, with at least one alternative route not being assessed and several others which in FBC view having not adequately assessed.

18.1.5 FBC accepts the principle of the "Rochdale" parameter plan approach as a basis for assessment and application. However, the parameters set in this proposal are too vague for important impacts to be properly identified, assessed, balanced, managed and ultimately mitigated, with important elements of the proposal undermined by insufficient detail.

18.1.6 In FBC view the appropriateness of the dDCO cannot be fully assessed until the incomplete matters identified in the ES have been addressed. It is apparent that issues exist within the dDCO, notably relating to the permissive nature of any controls relating to construction (both methods and timing), risk management and monitoring.

18.1.7 The applicants have repeatedly alleged that the approach being taken with this application, with two entities working together to bring forward a joint scheme, is "unprecedented" and that it will reduce the adverse impacts. FBC is of the opinion that no evidence has been presented to support this assertion and as it stands there is no public benefit being accrued from this approach. In fact, it is the opposite with extended construction commissioning periods, independent construction and decommissioning operations clearly introducing additional risks and harms.

- 18.1.8 The applicants as stated cannot commit to joined approach which could reduce risk and managing impacts. In FBC view this could lead to repeat adverse impacts arising across multiple phases/locations for construction and decommissioning along with duplication of resources and increased impacts on individuals, communities, businesses and the environment.
- 18.1.9 The degree of flexibility being sought to facilitate sequential development and reduce interdependency for whatever reason could increase adverse impacts and risks, which have not been properly and adequately assessed in the ES. And importantly prevents the weighing of adverse impacts against public benefit to meet national and local policy requirements.

END.

Appendix 1: Summary Assessment of Local Plan Policy Compliance.

Assessment of Compliance with Policies of the Fylde Local Plan to 2032 (Incorporating Partial Review)

Direct/clear and harmful contravention of policy	
Some impacts in contravention of policy, possibly capable of mitigation	
No relevant impact identified	

	A Vision for Fylde to the Year 2032		Damage to rural character and attractiveness of countryside; uncontrolled effects on dune sea defence
Strategic objective 1	To create sustainable communities		Development located in green belt /area of separation; developer contributions required to mitigate impacts
Strategic objective 2	To maintain, improve and enhance the environment		Loss of BMV agricultural land; impact on biodiversity; effect on green belt and area of separation; uncontrolled effects on coastal defence
Strategic objective 3	To make services accessible		Degraded accessibility by walking and cycling; inappropriate development at Blackpool Airport

Strategic objective 4	To diversify and grow the local economy		Widespread disruption
Strategic objective 5	To develop socially cohesive, safe, diverse and healthy communities		Impacts on recreation
S1	The Proposed Settlement Hierarchy: divides settlements into key service centres, local service centres, tier 1 larger rural settlements and tier 2 smaller rural settlements		
DLF1	Development Locations for Fylde: this policy sets out the overall development strategy of four strategic locations for development: 90% of development to be at the four strategic locations		Development would undermine operation of existing land uses
M1	Masterplanning the Strategic Locations for Development: provides criteria for the masterplanning of strategic sites		
SL1	Lytham and St Annes Strategic Locations for Development: identifies allocated sites in this location		
SL2	The Fylde-Blackpool Periphery Strategic Locations for Development: identifies allocated sites in this location, including the Blackpool Airport EZ site		Impact on Blackpool Airport EZ
SL3	Warton Strategic Location for Development: identifies allocated sites in this location		
SL4	Kirkham and Wesham Strategic Location for Development: identifies allocated sites in this location		
SL5	Development Sites outside the Strategic Locations for Development: identifies allocated sites in these areas		
GD1	Settlement Boundaries: defines the boundary between settlements and		

	countryside areas, areas of separation or green belt as applicable		
GD2	Green Belt: states national policy will be applied; boundaries defined		Inappropriate development
GD3	Areas of Separation: defines two areas under the policy and sets out restrictive criteria for development within those		Large scale built development contrary to the policy
GD4	Development in the Countryside: defines area and sets out criteria for development: generally uses appropriate to a rural area		Large scale development including substantial permanent development contrary to policy
GD5	Large Developed Sites in the Countryside and Green Belt: policy providing for use of sites including the prison and Springfields in the event that their existing use were to cease		
GD6	Promoting Mixed Use Development		
GD7	Achieving Good Design in Development: provides criteria for a wide range of design elements		Permanent structures of harmful scale and design, lack of detail in proposals to fully assess but likely impacts on historic, residential and natural amenity
GD8	Demonstrating Viability: sets criteria for demonstrating a site is unviable, then allowing a non-allocated use		
GD9	Contaminated Land: encourages use of previously developed land subject to remediation		
EC1	Overall Provision of Employment Land and Existing Employment Sites: sets out overall employment land requirement, provides allocations to meet it including		Impact on Blackpool Airport EZ

	the Blackpool Airport EZ site, and identifies existing sites to be protected		
EC2	Employment Opportunities: provides protection to all types of employment sites		
EC3	Lancashire Advanced Engineering and Manufacturing Enterprise Zone, at BAE Systems, Warton: supports specialised development in line with the company's operations and the DCO for the site.		Impact on BAE Systems, Warton
EC4	Blackpool Airport Enterprise Zone: supports EZ, allows for potential relocation of airport buildings, possible enabling development, provides for masterplanning and potential LDO if needed.		Impact on EZ
EC5	Vibrant Town, District and Local Centres: sets out the retail hierarchy, protects existing centres, provides for development of new centres, protects community/ leisure/ cultural facilities		Impact on visitor numbers
EC6	Leisure, Culture and Tourism Development: promotes and protects the seaside resort including beach based events, leisure assets including golf courses; promotes rural tourism including open coastline and rural walking/ cycling/ horse riding networks		Impacts on visitor numbers, impact on tourism assets such as coastal features and PRowS
EC7	Tourism Accommodation: promotes developments of high quality serviced accommodation; restricts holiday caravans for holiday use		
H1	Housing Delivery and the Allocation of Housing Land: sets out requirement of 7,275 homes over the plan period		
H2	Density and Mix of New Residential Development: sets out requirements for density, mix, accommodation for the elderly, custom/self build		

H3	Conversions and Change of Use to Residential: provides criteria for acceptability		
H4	Affordable Housing: requirement for 30% affordable housing on development sites except where unviable		
H5	Gypsies, Travellers and Travelling Showpeople's Sites: allocations at The Stackyard, Bryning and Thames Street Newton; criteria-based policy if additional need demonstrated		
H6	Isolated New Homes in the Countryside: criteria for rural worker housing and exceptional design; allows reuse of heritage assets, redundant buildings		
H7	Replacements of, and Extensions to, Existing Homes in the Countryside: restrictions to rural residential extensions		
HW1	Health and Wellbeing: broad policy promotes healthy lifestyles through active travel, gardens, health facilities; requirement for Health Impact Assessment		Impact on recreation, including pedestrian and cycle routes; disruption from construction
HW2	Community Facilities: identifies need for new facilities; protects existing facilities		Impact on recreation
HW3	Protection and Provision of Indoor and Outdoor Sports Facilities: protects existing facilities unless criteria are met		Impact on recreation, including outdoor sport facilities
INF1	Service Accessibility and Infrastructure: requires minimisation and mitigation of effects on infrastructure, new or improved infrastructure if needed		Disruption; insufficient mitigation of environmental impacts of new infrastructure
INF2	Developer Contributions: sets out range of infrastructure for which contributions will be requested but not exhaustive		Insufficient mitigation for impacts on

			infrastructure, services and environment; no mechanism to secure appropriate contributions
T1	Strategic Highway Improvements: supports development of named schemes, safeguards land		
T2	Warton Aerodrome: protects the aerodrome for its aviation capabilities		Potential for adverse impacts on aviation operations
T3	Blackpool Airport: protects the airport for its airport function		Impacts on Blackpool Airport EZ
T4	Enhancing Sustainable Transport Choice: promotes measures to support non-car travel including development of coastal walking/cycling routes		Obstruction/ diversion of routes; harm to pedestrian and cycle routes
T5	Parking Standards: requires provision on-site where possible		Works and permanent access results in loss of spaces
CL1	Flood Alleviation, Water Quality and Water Efficiency: stresses protection of watercourses and careful management of surface water		Uncontrolled works to watercourses
CL2	Surface Water Run-Off and Sustainable Drainage: sets requirements for discharge rates and management of discharge		Uncontrolled works to watercourses
CL3	Renewable and Low Carbon Energy Generation – excluding onshore wind turbines: sets criteria for the assessment of schemes, including landscape, agricultural land, aviation and defence systems		Failure to meet policy criteria including agricultural land take
CL4	Decentralised Energy Networks and District Heating Systems: encourages suitable schemes		

ENV1	Landscape: requires development to have regard to the landscape context and type; requires landscaped buffers, conservation of existing landscape features, replacement of lost landscape features		Failure to have regard in design and location
ENV1	Landscape: coastal change management areas: any development must meet 7 criteria including that it does not impede the function of sea defence structures; developer contributions will be sought for the conservation, management and enhancement of important habitats		Uncontrolled impacts: damage to coastal defence asset; no mechanism for the provision of contributions
ENV2	Biodiversity: protects identified sites according to the hierarchy of conservations sites; protects priority species		Uncontrolled impacts; insufficient and inappropriate mitigation; incomplete evidence and assessment
ENV3	Protecting Existing Open Space (Part of the Green Infrastructure network): protects existing open spaces including sports and playing pitches		Permanent damaging impacts; lack of control over impacts
ENV4	Provision of New Open Space (Part of the Green Infrastructure network): sets requirements for open space provision in new developments		Absence of provision in lieu of temporarily lost spaces
ENV5	Historic Environment: requires proposals to conserve/ protect/ enhance the historic environment; promotes heritage led regeneration		Failure to assess impacts as unknown; harm inadequately quantified and justified

Appendix 2: List of Abbreviations

- BRAG – Black Red Amber Green assessment method
- BNG – Biodiversity Net Gain
- DCO – Development Consent Order
- dDCO – Draft Development Consent Order
- EN-1 – Overarching National Policy Statement for Energy
- EN-3 – National Policy Statement for Renewable Energy Infrastructure
- EN-5 – National Policy Statement for Electricity Networks
- ExA – Examining Authority
- FBC – Fylde Borough Council
- FLP – Fylde Local Plan to 2032 (incorporating Partial Review)
- LIR – Local Impact Report
- RNLI – Royal National Lifeboat Institution

Appendix 3: Links to Local Plans

Fylde Local Plan to 2032 (incorporating Partial Review)

Plan text (direct link):

<https://new.fylde.gov.uk/wp-content/uploads/2021/12/Fylde-Local-Plan-to-2032-incorporating-Partial-Review-adopted.pdf>

Policies map (direct link):

<https://new.fylde.gov.uk/wp-content/uploads/2019/09/Policies-Map-Adopted-2018-compressed.pdf>

Local Plan webpage:

<https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/adopted-fylde-local-plan-to-2032-incorporating-partial-review/>

Other Plans

Preston Local Plan:

<https://www.preston.gov.uk/article/1050/Preston-s-Local-Plan>

Preston City Centre Plan:

<https://www.preston.gov.uk/citycentreplan>

South Ribble Local Plan:

<https://southribble.gov.uk/planning-policy/south-ribble-local-plan-2015>

The Central Lancashire Local Plan 2023-2041 Publication Version:

<https://centrallocalplan.lancashire.gov.uk/plans-and-documents/regulation-19-publication-version/>



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Any enquiries regarding this document/publication should be sent to us at the Town Hall, St Annes Road West, St Annes FY8 1LW, or to listening@fylde.gov.uk.

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Authorised by: Paul McKim, Head of Planning and Building Control