

## 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 Materially Advantageous Solutions.

1. There is already an established connection of an Irish Sea Wind Farm to Penwortham. This route via the National Grid line that runs northwest to Hambleton and then on to Middleton/Heysham.
2. 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 is 400KV capability already but to accommodate more offshore wind power, additional cables would be beneficial on the existing pylon system.

4. Using 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' route.
5. Why have the applicants not considered other alternatives. 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. Which is not logical, practicable or reasonable and is detrimental to the residents and businesses in the Fylde.
6. 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.' Which again is not logical, reasonable showing that all avenues have been researched etc.
7. 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.

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. Which is a reasonable and practical solution

7. M&M. proposals maximises the impact to the area and the people living in the Fylde.

8. 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. Surely they should be able to give a better time frame structure - nothing here is constructive not just local people but wildlife and environment

**9. There has been a distinct lack of proper engagement and consultation with stake holders** - It is apparent 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 shows that M & M have not thoroughly planned their submission and have not engaged with stakeholders because they do not have the answers to reasonable questions.

**Agriculture** - They have failed to work with farmers and do not seem to understand how livestock are kept, what they eat or where and how they graze or the financial implications to farmers because of the construction and disruption.

## **Beach Access**

Closing and or drastically altering access to the beach will have a significant impact on tourism and local people. It will make it impossible for people with disabilities to easily access the beach and will thus hamper well being, and goes against disability discrimination laws.

The beach ecosystem including wildlife rare and migrating will be greatly impacted by how the dunes and the beach is going to be destroyed in the process.

The ecosystem under the dunes that has not been adequately considered by the applicant and any damage has no planned mitigation.

## **Air safety**

The lack of engagement with BAE Systems is apparent and the failure to commit to a survey does not show good practice.

## **Cumulative Impact**

Existing projects already cover 225 acres with nuclear and solar energy within the 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, 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**

May 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.

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.

### **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.

### **Safety**

This is a key point - 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.

Other issues not properly address for us the stakeholders living in the area.

- 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. T
- The failure to agree a transport plan and its impact on traffic accidents and fatalities. .
- There are issues with access to the site with existing roads being single track and designed for light traffic only.

### **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.

The traffic plans are flawed traffic and compromise on safety. In particular t 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.