

Further to my oral representation at the open floor hearing on 29<sup>th</sup> April, I would like to add further reasoning as to why I believe the proposed Plan in its current format, should not proceed.

I spoke about the wholly inadequate Consultation process and the devastating impact on Greenbelt land, Marine Conservation Zones and high value agricultural land by damaging wildlife and their habitats.

## DUNES

More than 80% of Lancashire beaches have been lost in the past 150 years due to urban expansion and erosion. The dunes play a vital role in coastal defence acting as a natural barrier against sea erosion and flooding.

The Fylde Sand Dunes Project overseen by Lancashire Wildlife Trust and Blackpool and Fylde Council enhance biodiversity by planting trees and marram grass to stabilise the dunes and to encourage the accretion of sand blown in for future dune growth. They have helped the sand dunes grow strong and resilient and formed extensive habitats for especially adapted animals as well as a natural defence against extreme weather conditions. They successfully reintroduced the sand lizard, one of the UK'S rarest reptiles back to the dunes established new populations. The Project received an allocation of nearly 1 million from The Environment Agency to extend the project for the next five years.

Pipework at the dunes will undo this vital work and cause devastating effects to wildlife and habitats, threatening the hydrology of the dunes and the viability of the sea defences. The presence of export cables beneath SSSI will likely disrupt the aquifer that sustains the dune slacks on a permanent basis. This is a huge unknown risk, the impact of which will not be clarified until after DCO consent is granted and at detailed design stage.

The Direct Pipe technology the Applicant briefly refers to will still require excavating the huge borehole and installing the pipeline, will still require the beach to be cleared and closed and tracks to be made for tankers and will still create huge amounts of noise, pollution, wildlife disturbance and chaos on the roads.

## ECOLOGY

National Resources Institute in Finland 2023, showed how 70% of birds mammals and fish are displaced from homes by wind power developments. The noise and devastation for many years over such a large area of feeding, roosting and migratory sites would be a disaster to fragile ecosystem habitats.

No effective seasonal restrictions have been committed to by The Applicant – indeed the very exact overwintering area for pink footed geese is where the Morgan substation is

proposed to be built. We filmed hundreds of these birds in this area in one day earlier this year, far more than the Applicant states arrive each year in their migratory birds technical data.

The Plan demonstrates a huge gap between policy rhetoric and practical implementation e.g. the plans overlap with herring spawning and seal at sea areas which suggests potential ecological risks are not fully addressed and without insufficient details. The Applicants prove their data is flawed and there are errors in habitat mapping.

The information provided in the Environment Statement is not sufficient to understand the implications of onshore environmental impacts as their conclusions are not properly justified and the Plans are too vague.

The Biodiversity Statement [AS-054] suggests the Applicants only provide Biodiversity Net Gain for the permanent land take and has failed to include the land planned for the cable route. Land that is not used temporarily and not fully reinstated for two years should also be included in the BNG calculation.

## HERITAGE

Thames Street is south of Newton and is proposed for HGV access. It is recorded by The Lancashire Historic Environment Record as being 'one of the richest areas of Neolithic to Bronze Activity within the North West'. The proposed route will destroy the valuable, unique history of the area and cause damage to unknown historic buried artefacts.

## HYDRAULIC FRACTURING

Hydraulic fracturing in the Fylde left an underground footprint. It caused over 50 seismic events in the area and 2 earthquakes. The proposed Plans Order limit runs in close proximity to the shale gas exploration sites at Preston New Road and Anna's Road, Ballam.

There is a reported compromise of abandoned well integrity in this area. No ongoing monitoring for these wells means we do not know if they are leaking. Durham University confirmed the loss of integrity of a well could lead to the risk of groundwater contamination which provides a third of our drinking water. Any damage to the well could cause contaminated fracking fluid leaking into the local aquifer with the resulting contamination of the water. The Environment Agency have no data regarding groundwater monitoring at this site. Any underground disturbance with cable laying could potentially pollute soil, air and water.

Furthermore, Cuadrilla breached environmental legislation with fracking fluid from the site going into Carr Bridge Brook. Drone footage shows the leakage from the site into the

field. The site is quite often underwater due to rain which poses a pollution risk. Our landscape is flat and floods easily and contamination can go anywhere.

Residents in the Ballam area are already extremely concerned regarding the slip of the land, subsidence and damage to their properties, unsafe drinking water and constant discoloured surface water and flooding.

It is a unknown risk to take and I would implore the Planning Inspectorate to dismiss this route in the interests of public health and safety.

## FAULT ZONES

The Fylde has a very complex geological structure. It is heavily faulted. Trenching near or across an active or shallow fault may disrupt fault zones. Excavation could destabilise pre-existing faults, potentially triggering further seismic activity. The area around Ballam and Annas' Road already suffers from land slip and the Environment Agency confirms this area is critically stressed. The planned cable route runs close to the Wakepark Fault leading from Anna's Road to Preston New Road. Faults are unpredictable and excavation can be a fast track route for gas and fluids to reach the surface from previous fracking activities.

## FLOODING

The Project will adversely effect the water environment as a result of increase in surface water run off. The land drains already struggle to cope with the increase in rainfall particularly when combined with high tide. Creating large concrete pads on existing agricultural fields and heavy vehicles over significant areas will result in an unacceptable risk of further flooding after heavy rainfall.

Hydraulic fracturing at PNR1z well at Preston New Road entered the 'Wakepark' fault around the field areas of the electric substation on Peel Road. The earthquakes appear to have caused an increase in ground water flow coming up so flood water has nowhere to go down and remains on top. The Applicants have not considered how the seismic activity has affected the fluvial flow in this area or the potential consequences of flooding to nearby residents and their properties.

## ALTERNATIVE ROUTE

I welcome the Planning Inspectorate referring to Stonehenge and the Langley Park School judgements which set great examples of the Applicants addressing concerns of the residents. The prop plan, however, fails to demonstrate consideration of other points of connection to the National Grid which would greatly minimise impact on the environment and community.

An already established connection via the National Grid line of an Irish Sea Wind Farm is in Penwortham. The existing line is 400KV capability already and with the addition of

cables on the existing pylon system would generate more offshore wind power. Costing data from IET 2025 on Transmission Technologies suggests a saving of 900 million using this existing connection. This support that landfall should be based on the shortest and most direct route. The alternative route meets all 4 criteria of the HNDR:

- It is shorter
- Has available landfall
- Connects to an available substation
- The site owner is compliant regarding the connection.

This route protects many miles of valuable, protected land and any future excess power could generate green hydrogen, as is proposed by the current site owner of Hill House TEZ.

### CUMULATIVE IMPACTS

The huge cumulative impacts need to be carefully considered alongside other huge solar farm plans nearby and offshore wind farms in the Irish Sea. Existing nuclear/solar energy already cover 225 acres within the Parish which dwarfs the small, quiet villages within. A further 32 hectare solar farm is proposed, directly opposite the Applicants planned substation. No consideration has been afforded to the local community by the Applicant.

The in- combination effects of both the generation and transmission assets must be considered for all potential impacts. The Applicant has only selectively referenced in combination effects to support its analysis of climate change impact. The infrastructure requires massive amounts of fossil fuel to produce and the reason the Applicants carbon dioxide emission forecast may drop is because the mining and manufacture of these machines is outsourced to other countries.

The significant land take and long term loss of agricultural productivity appear a prioritisation of national targets over local policy objectives, breaching the balance required by the NPPF.