

Summary of points made at relevant representations

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

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

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

Consultation efforts have been unsatisfactory and insufficient, leading to stakeholder frustration. It is evident that there are numerous examples of where there is a lack of clarity, a lack of engagement with major stakeholders and failure to respond constructively to reasonable requests from the Panel and others. This lack of engagement is reflected in the lack of detail with many omissions in the Applicants' submission. The lack of detail shows poor preparation, poor engagement with stakeholders and poor co-ordination between the two sides of the project.

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 that could be extended resulting in a total period of at least 10 years allowed. This is only of benefit to the Applicants and not to local communities impacted by these proposals.

The cumulative impacts of multiple developments occurring simultaneously over an extended period with the substations and cabling occurring together with multiple solar farm projects. There has been a complete lack of adequate impact assessment to nearby communities, businesses, tourism and livelihoods.

As a result existing and proposed energy projects threaten to overwhelm greenbelt areas.

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

Beach access at St Anne's faces will result in closures without mitigation plans and was dismissed as a concern by the Applicants, whereas it is clear that closures of the beach will occur and there appear to be no mitigation plans for access in place. The Applicants refused to provide plans for the beach when asked by the Inspectors.

Air safety concerns remain unresolved due to poor engagement with BAE Systems. The BAE sites importance for our nation's defence, and to the local economy is profound and would be compromised without an agreement on managing bird strikes. The Applicants is unresponsive to legitimate concerns on air safe indeed, it seems that there is no effective mitigation approach available to the applicant, according to BAE Systems.

Road safety/congestion. 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.

Community benefits remain undefined despite available government guidance. Unfortunately, the Applicant has avoided defining any community benefits until the application has been approved and so cannot be regarded as benefits in supporting a decision on the application

The Lancashire Historic Environment Record shows there are Bronze Age Cairns, Roman Fort settlements and Quaker burial grounds. Freckleton, Newton and Kirkham are all mentioned in the Domesday book. There have been numerous Roman finds in the areas of Kirkham and Dowbridge areas, where there was access to the sea along the river Dow none of these have been considered. The setting of historic buildings on Grange Lane, Newton are severely compromised and impacted as a result of this development, with no consideration or reference within the application.

Biodiversity concerns persist, with protected bird species inhabiting affected areas.

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

All of the above issues are compounded and worsened by the refusal of the applicants to consider any alignment of their works leading to a potential 10 year period of disruption.