

In my Deadline 1 Representation REP1-214 I referred to the St Annes on Sea "Island" replacement sea wall defences and incorrectly stated these works were to be carried out between 2023 and 2025.

In fact the Planning Application for these works is still under consideration by Fylde Borough Council and their Planning Application Reference is 23/0082.

The works are described as follows:-

DEMOLITION OF EXISTING SEA WALL, REVETMENT AND MINATURE RAILWAY SHED, AND REPLACEMENT WITH NEW COASTAL PROTECTION SCHEME CONSISTING OF A STEPPED REVETMENT, INCLUDING PUBLIC REALM IMPROVEMENTS TO PROMENADE, CONSTRUCTION OF TEMPORARY COMPOUND AREAS AT FAIRHAVEN ROAD CAR PARK/ THE ISLAND CAR PARK, TEMPORARY INFILL OF LAKE FOR USE AS TEMPORARY CAR PARK/ TEMPORARY RELOCATION OF BEACH HUTS/ TEMPORARY COMPOUND AREA, TEMPORARY STORAGE CONTAINERS AND TUNNEL FOR MINATURE RAILWAY, THE SITING OF 45 BEACH HUTS, REPLACEMENT RAIL TUNNEL AND ENGINE SHED AND RECONFIGURATION OF PLEASURE ISLAND CAR PARK.

Can the Examination Authority please take into consideration that if the above works are passed for approval by Fylde Borough Council there is a high probability that they would coincide with the proposals for the On Shore Transmission Assets with corresponding cumulative effects on both the local economy and the amenity value of the coastline potentially for a significant period.

The planning application documents give further detail on the nature and scope of these proposed works.

Open Floor Hearing 2

Further to the Open Floor Hearing 2 held on the 24th June 2025 I wish to make further comments regarding both matters discussed at this hearing and in addition to representations previously made by myself (RR-2224, REP1-214, REP1-215 & REP1-216).

1. Public Support

It should be apparent from the oral representations made to the Examination Authority (EXA) at both Open Floor Hearings 1 & 2 and from the numerous written representations made to date that there is little or no public support from the local community for the works proposed in this Development Consent Order (DCO). The many disruptive impacts, both direct and indirect, on the local community, agriculture and businesses, stretching over a timescale of up to 10 years, are disproportionate to the alleged public interest benefit from the proposed installation of these Onshore Transmission Assets.

The EXA should take this demonstrable lack of public support as a material consideration when making their final recommendation.

2. Public Visibility

It is extremely unfortunate that the Planning Inspectorate considered that the Applicant's Public Consultation was sufficient and met the Statutory Requirements. Again it should be apparent to the EXA from both oral and written representations that at the time this consultation was carried out in the Autumn of 2023 the Applicants provided such a broad brush, high level of information that the many members of the public and businesses who attended the Consultation events were basically left none the wiser when they left because their detailed queries could not be answered. Instead of continuing with an iterative process once the Applicant's consultation closed on 23rd November 2023 there was no further communication to the General Public until letters were sent in December 2024 advising that their Application for a DCO had been accepted for Examination.

The Applicants response to this has been that the Public may access their documentation either directly using their own devices or by using digital access which is available to the Public at specified locations e.g St Annes Library.

As of the time of writing these further comments there are, in the EXA Document Library some:-

- 240 separate documents under the Category "Application Documents" (APP 001 to 240)
- 15 separate documents under the Category "Adequacy of Consultation Responses" (AoC 001 to 015)
- 2303 separate Representations under the Category "Relevant Representations" (RR 0001 to 2303)
- 9 separate documents under the Category "Procedural Decisions and Notifications from the Examining Authority" (PD 001 to 009)
- 71 separate documents under the Category "Additional Submissions" (AS 001 to 071)
- 49 separate documents under the Category "Events" (EV1 001 to 003, EV2 001 to 005, EV3 001 to 005, EV4 001 to 018, EV5 001 to 006 and EV6 001 to 003)

- 55 separate documents under the Category “Procedural Deadline A” (PDA 001 to 055)
- 227 separate documents under the Category “Deadline 1” (REP1 001 to 227)
- 70 separate documents under the Category “Deadline 2” (REP2 001 to 070)
- 14 separate documents under the Category “Other Documents” (OD 001 to 014)

So in total some **3053 separate items of information**, much of which is detailed and highly technical, which the Applicants seem to feel is an adequate approach for a member of the General Public to access digitally in order to understand the scale and impact of these proposals.

I have argued in a previous representation that for civil engineering projects of this nature, extending over a multi year period and causing disruption to the local community, disturbance and damage to the marine, costal and agricultural environments, the Applicants should have (and still could) stage a public exhibition of their proposals with scale models showing the impact of the above ground assets and full details of the proposed trenching and trenchless methodology, the types of heavy equipment involved, typical samples of the offshore and onshore cables that will be used, the scale of the proposed coffer dams and cable landing equipment and large scale photographs and videos showing how offshore cables are landed, how trenchless and open trenching excavation is done and what the proposed substations will look like in their proposed positions.

In other words, provide to the General Public, an open and honest depiction of the reality of their proposals and not expect them to access a multitude of digital documents to understand how this is going to impact their community for years to come.

Given the hundreds, if not thousands, of million pounds investment in the offshore and onshore assets involved this seems an entirely reasonable proposition and I would ask the EXA to consider carefully when making their final recommendation whether they can say in all honesty that the General Public have been openly and fully informed of the detail of this Application in a reasonable and accessible manner.

Fundamentally I believe the General Public, including many business owners, in the local community have little or no appreciation or understanding of the Applicants proposals due to the limited visibility and accessibility of the specific details of this Application for a Development Consent Order.

3. The Landfall Works

I have made previous representations regarding these and note the Applicants response. However, the Applicants have not proposed any contingency or alternative methodology should their proposed trenchless approach prove not to be feasible. They have themselves admitted that further geological and feasibility studies need to be carried out to determine that the trenchless methodology to bore up to six separate bore holes from Blackpool Airport under the Golf Course, the Railway Line, the Nature Reserve and SSSI, Clifton Drive North and the Sand Dunes is feasible. They have also admitted that open excavation will not, and in any case cannot, be used as an alternative.

So with no alternative open trenching methodology available what is their position if their geological or other feasibility studies show that the proposed trenchless method, now understood to be the Direct Pipe method, is not possible or fails in practice when attempted on site?

4. Alternative Route

It is in the Public Interest that the National Electricity Systems Operator and National Grid Electricity Transmission, as an Electricity Transmission Licensee, carry out a full technical appraisal of providing a connection to Pentwortham via an intermediate connection at Stanah. It is not for the Applicants to determine, as they state in REP1-089.2 of EXA Document Reference REP2-031:-

“that it is not necessary nor appropriate to consider or assess during this Examination different projects with alternative Pols (or “terminating point[s]”

Both NESO and NGET should be acting in the overall Public Interest with regard to justifying any Connection Offers they make to Applicants and should be held to account with regard to these. These Connection Offers should not be made without taking into account the impact of any connections on the environment and the local economy especially where a viable alternative exists for which, in the case of the Hillside Technology Site and the Stanah intermediate connection point, there has been no evidence to show that this is not possible from a technical perspective irrespective of any cost advantages which may also be realised.

Failure to show robust reasons why the alternative suggested by various parties cannot be implemented is yet another reason why any recommendation for approval of the DCO could be subject to a subsequent challenge.

5. Judicial Review

Given the representations and objections made to date from Statutory and non-Statutory bodies, agricultural, rural and other businesses, local Politicians and the General Public I believe there will be adequate and convincing grounds for a full Judicial Review should this Application for a DCO be recommended and subsequently approved by the relevant Secretary of State.

Such a review would, I believe, command the support of the vast majority of the local community, residents and businesses alike.