



Morgan & Morecambe Transmission Cables Examination

IP Reference-20053931

September 2025

Deadline 5 – Written Statement

This statement is provided by Fylde Borough Council [FBC] for submission at Deadline 5 and is organised as follows:

- Section 1: General Update;
- Section 2: Response to Green Belt Technical Note [REP4-092]; and,
- Section 3: New/Recently Consented Development Update (Solar Farms).

1 General Update

- 1.1 FBC has been working positively and proactively with the Applicants, officers, consultees and other relevant interested parties to progress matters relating to assessment of the updated and new information submitted to the Examination, as well as with a view to resolving outstanding matters.
- 1.2 This work has included a significant number of topic-specific meetings with the Applicants' team, as well as regular meetings with its Consultative Group of Councillors. Specifically, since Deadline 4, FBC has engaged in excess of 22 topic-specific meetings with the Applicants and has provided written comments on a range of documents.
- 1.3 FBC has previously raised concerns about the volume and type of new and updated information being submitted to the Examination, most recently in Section 1.2 of REP4-134. FBC considers this the situation has increased, with reduced amount of time left in the Examination limiting the possibility for full proper consultation and detailed assessment of information and amendments in response.
- 1.4 FBC also maintains its position that some of the new work being carried out at this stage, particularly with regards to: landscape and visual impacts; Green Belt impacts; rural and agricultural business impacts; ecology (notably sand lizards, peat, dunes SSSI, bird mitigation); and, tourism, is being prepared long after these matters should have been considered and directing the characteristics of the control measures.
- 1.5 The Nationally Significant Infrastructure Project [NSIP] consenting process is intended to be front-loaded, and the applicants are required to be well-prepared, to enable efficient examination within the maximum six months provided by Section 98(1) of the Planning Act.
- 1.6 FBC has worked to prepare a draft Statement of Common Ground and has agreed a version with the Applicants for submission at Deadline 5. FBC has received written confirmation from the Applicants that this will be submitted.
- 1.7 FBC also requests that the Examining Authority provides a more detailed agenda for the next hearing sessions at their earliest convenience, which includes the order and topics of matters to be discussed, to assist the Council with efficiently resourcing officer attendance.

2 Response to Green Belt Technical Note

2.1 Background

- 2.1.1 FBC continues to engage with the Applicants on matters relating to Green Belt, with an ongoing series of meetings to continue after Deadline 4. This response sets out the position of FBC up to Deadline 4 particularly with reference to the Green Belt Technical Note [GBTN] [REP4-092], and whilst it is hoped that progress will be made with regards to some of the issues raised, FBC requests that the Examiners seek to address issues raised.
- 2.1.2 EN-1 sets out the government's policy for the delivery of major energy infrastructure and it reiterates the aims of Green Belt policy to prevent urban sprawl and maintain the openness of land between settlements, stating that development within identified Green Belt should not be approved except in very special circumstances and that substantial weight should be given to any harm to the Green Belt in relation to renewable and linear infrastructure.
- 2.1.3 This is further reinforced within EN-3 which also acknowledges that electricity network infrastructure may comprise inappropriate development and impact on the openness of Green Belt.
- 2.1.4 Although a necessary requirement, the substations are not considered linear infrastructure and their scale and location within the Green Belt is deemed to be inappropriate which would result in a significant loss of land and harm to openness.
- 2.1.5 The NPPF advises that the Green Belt serves five purposes, however Section 1.2.4.3 of the GBTN only considers purposes 'a' and 'c' relevant to the proposed Transmission Assets. FBC notes that Kirkham is neither a large built-up area nor a village and therefore criteria 'b' should also be recognised as relevant when assessing the impact of the substations upon the openness of the Green Belt and its function in this area.
- 2.1.6 The Fylde Local Plan to 2032 (Adopted December 2021) [FLP] reiterates the importance of protecting the land between Kirkham, Freckleton and Newton with Scales and layers that protection with its Green Belt Policy GD2 and Area of Separation Policy GD3, and environmental and green infrastructure policies, in particular ENV3 paragraph f.
- 2.1.7 Whilst it is accepted that the NPPF recognises occasions when Very Special Circumstances may warrant development within the Green Belt through the increased production of clean energy, it must be counterbalanced by the long-term impacts of such development.
- 2.1.8 The Morgan and Morecambe substations conflict with the FLP Policies which seek to protect the open space between Kirkham, Freckleton, and Newton with Scales, and to preserve the historic pastoral character and green infrastructure which currently exists in that location.
- 2.1.9 The type and scale of the proposed substation developments would introduce imposing and inappropriate urban structures into otherwise open agricultural land and would contribute to the visual coalescence of development between Kirkham and Freckleton within views, particularly from the A584 and A583.
- 2.1.10 The development would also have a detrimental impact upon the Area of Separation designated between Kirkham and Newton, causing harm to the effectiveness of the gap which has been specifically retained between the two settlements to preserve their identities and distinctiveness.

- 2.1.11 There is a clear requirement for the Applicants to avoid, minimise and then mitigate harm, as acknowledged by the Applicants throughout the GBTN (Section 1.2.7.5; 1.3.1.2; etc.).

2.2 Assessment of Harm

- 2.2.1 FBC maintains its position that the siting of the two substations in the locations proposed will result in significant harm to the openness of the Green Belt and compromise the ability of the policy to protect the existing countryside from urban sprawl and encroachment between settlements.
- 2.2.2 The Applicants make the distinction between spatial openness and visual openness and conclude openness does not imply a freedom from any built form.
- 2.2.3 This is agreed, however the perceived openness of an area, whether spatial or visual, depends on the harmony which is achieved by the elements within that area and whilst farmhouses or greenhouses may be considered existing development/built form, their scale and nature is more reflective of the local vernacular and in keeping with the rural aesthetic.
- 2.2.4 The large scale and incongruous nature of the proposed substation sites, located within the relatively small scale, pastoral landscape into which they are set is not be harmonious and, despite the attempt to mitigate the proposed development with planting and earthworks, would still appear out of character with the existing landscape type.
- 2.2.5 Mitigation of each substation can only be achieved primarily through the manipulation of aesthetic aspects of site layout and building design, including size and external finishes/colours to minimise its intrusive appearance in the landscape, and this is limited by the engineering/operational requirements. Therefore, it is not agreed that the presence of vegetation or landform could provide sufficient visual enclosure to the proposed substations, integrating them into the receiving landscape or mitigating the impacts of them on either spatial or visual openness.
- 2.2.6 FBC notes and notes the approach the Applicants the approach have taken. However, development of this scale and type will result in the encroachment of urban/industrial features within an area which is relatively sparsely populated countryside. The Applicants' assessment of the existing spatial openness of the Green Belt between Kirkham and Freckleton states that HMP Kirkham is an industrial facility, which is not accurate.
- 2.2.7 The site is a largely single storey, open prison site, with no high-level lighting or imposing boundary treatments and it is located close to the edge of Kirkham on the south west corner of the busy A583/Freckleton Road junction. Rolling topography and intervening hedgerows/trees restrict many views across this landscape towards and from the prison, except for occasional opportunities where long views across to the West Pennine hills are available.
- 2.2.8 It is accepted that development along Lower Lane, which is largely mid-century, spatially encroaches into the Green Belt, however, neither this nor the prison site are visually prominent within this part of the Green Belt as the Applicants suggests, and the Green Belt policy is vital to protect the agricultural landscape from further encroachment.

- 2.2.9 Further south, the visual and spatial openness becomes more apparent as the topography levels out and vegetation cover becomes sparser. The presence of development within this area consists largely of pre-1900 farm cottages and dwellings along the southern half of Kirkham Road. Green Belt policy provides a strong tool to assist in safeguarding this historic agricultural landscape from encroaching development.
- 2.2.10 As previously commented, the spatial and visual harm to the Green Belt landscape caused by the proposed substations and their ancillary facilities, as well as the work compounds and access roads along the route, has been measured by the Applicants according to its permanence. Terms such as temporary and post-construction are suggested as short term, but could last up to five and a half years from the start of work.
- 2.2.11 Cumulative effects of multiple construction sites would also have a measurable impact on the function of the Green Belt, its amenity value, and tranquillity.
- 2.2.12 Despite some areas being restored following construction, it is unlikely that they will ever be fully reinstated to their original condition due to the limitations of the sites themselves and their operational requirements. Even where achievable, it would take many years for the landscape to recover, affecting both the openness and amenity value of the Green Belt.
- 2.2.13 Likewise, harm as evidenced by Section 1.4.3.57 of the GBTN appears to give greater weight to consideration of impacts on views from dwellings, than it does to impact upon the Green Belt.

2.3 Specific GBTN Comments

- 2.3.1 FBC also raises objection to a number of other matters contained within the GBTN.
- 2.3.2 Section 1.2.5.11 sets out that the Applicants consider that development must be within the Area of Separation to be reasonably considered to have an effect upon it. FBC sees no reason for this as previously detailed in Section 3.3 of REP4-134.
- 2.3.3 Section 1.6.3.32 states that there are relatively few public rights of way through the Green Belt. FBC considers that this position is not specific, as there are public rights of way through the Green Belt, and due consideration should be given to each of these.
- 2.3.4 Section 1.6.3.33 omits views from a number of dwellings without further justification. FBC would expect to see acknowledgement of views from dwellings at Manor Drive (north of the A583) and properties immediately adjacent to the junction of A583 with the B5192.
- 2.3.5 Section 1.6.4.66-75 should also include consideration of the access routes when assessing impacts on openness during construction. Relatedly, FBC does not consider that all compound areas will be fully reinstated to their original condition post-construction to be an accurate description given the proposed retention of access routes. FBC also queries whether this reinstatement would include ponds.
- 2.3.6 Section 1.6.4.78 has been redrafted to remove acknowledgement of harm caused by construction activities, with a reference that emphasis should instead be given to long-term effects. FBC considers this to be inaccurate and inappropriate to disregard the effects as temporary.

- 2.3.7 Section 1.6.4.82 concludes that construction activity would lead to minor/negligible harm to the wider Green Belt. This is made without full consideration of potential cumulative impacts particularly with reference to the nearby solar farm developments and reliance on the duration and severity of temporary activities as a mitigation.
- 2.3.8 FBC considers that the assessment in Section 1.6.4.92, which concludes that the overall degree of wider harm will be negligible is not appropriate, with respect to the Applicants' view of the role that Kirkham, HMP Kirkham and other existing development.
- 2.3.9 Section 1.6.4.102 cannot be accurate, for the reason that the Applicants are in ongoing discussions with the relevant interested parties with regards to developing and landscape strategy.

2.4 Conclusion

- 2.4.1 Whilst it is probable that the Green Belt would be impacted by the proposed transmission assets at some point from landfall to connection with the National Grid, it has not been demonstrated that the Very Special Circumstances of this particular location would outweigh the harm caused to the Green Belt and its functions over a different corridor, in particular with reference to the proposed location of the two substations.
- 2.4.2 Whilst the Horlock Rules illustrate good design intentions, the application does not appear sensitive to place and does not minimise the landscape and visual impacts of the proposal as required by Policy EN-1.
- 2.4.3 FBC maintains its position as set out in Section 4.2 of REP4-134 that the Horlock Rules do not support colocation of independent substations, and in fact that principles of the Horlock Rules would support consideration of separate locations for the substations.
- 2.4.4 FBC considers Applicants justification of impacts on the extent and openness of the Green Belt remains a concern. In our view it is unlikely that the scale and nature of the proposed development could ever be fully mitigated by landscape proposals or that the schemes could be sufficiently integrated into the landscape to lessen their effects on the openness.
- 2.4.5 FBC considers the construction phase effects on Green Belt do carry weight, since the construction phases could last for five and a half years spread over an even longer overall period of time and they would significantly affect openness and amenity which are protected by FLP Policies GD2, GD3 and ENV3. FBC considers that the length of the construction period along with the time taken for planting to mature would result in less than optimum mitigation to the proposal for up to 20 years.
- 2.4.6 The existence of Green Belt, Area of Separation and Environmental policies within the FLP reflects the importance of this area in maintaining the separation and identity of settlements, with the provision of amenity value to those settlements and the wider countryside from encroachment.
- 2.4.7 As such, they are constraints to the proper consideration of the merits of the proposals, and their aligned and layered objectives should be given due regard as required by EN-1.

- 2.4.8 FBC maintains its position that the Applicants have not appropriately considered Green Belt designation as a constraint during the site selection process. FBC has raised this at each deadline and hearing (Section 12.6 REP1-078; pages 2-3 REP2-057; Answer Q17.1.1 REP3-082; and, Section 4 REP4-134]) FBC also notes that the same issue has been raised by other interested parties, notably South Ribble Borough Council [REP1-227] and Lancashire County Council [REP1-085].

3 New / Recently Consented Development Update

- 3.1 FBC most recently provided an update on new and recently consented developments in Section 11 of REP4-134.
- 3.2 FBC is writing to provide an update on the progress of the two solar farm applications identified in their previous submission.
- Application 24/0541 at land to the west of Parrox Lane: Applicant has provided a voluntary Environmental Statement. Reason for this is due to original screening opinion (not EIA development) did not consider in-combination effects with NSIP. A 30-day consultation with neighbours and statutory consultees will expire on 18/10/25. No comments from statutory consultees have yet been received in response to this latest consultation but assuming their comments do not change from those previously issued, then outstanding matters relate to potential highways impacts which are in part of potential relevance in cumulative terms to the windfarm transmission proposals.
 - Application 24/0414 at Clifton Marsh Farm: updated Environmental Statement received. A 30-day consultation with neighbours and statutory consultees expired on 07/09/25. Several responses outstanding including Natural England and Highways – these are being sought.