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I will cover 3 main areas:

Equalities Impact

Birdstrikes and risk to life

Applicants integrity, capability and suitability

Equalities Impact

Under the 2010 Equalities Act decision makers are required to have 'due regard' to three key aims:

Eliminating discrimination, harassment and victimisation

Advancing equality of opportunity between people who share a protected characteristic and those who do not

Foster good relations between different groups

As a [REDACTED] resident and community volunteer it's clear to me that neither the applicant nor the National Planning Inspectorate (NPI) have made any attempt to conduct a proper Equality Impact Assessment, nor given 'due regard' to any of these aims.

Re protected characteristics, elderly and disabled people are over represented along the Fylde. Neither myself nor any of my neighbours or those the residents groups I'm involved with across Freckleton, Warton, Lytham St Annes and Squires Gate, have had anything approaching adequate communication re this application. [REDACTED] residents haven't had even a generic leaflet notifying us of what's being proposed, never mind an invitation to take part in an Equality Impact Assessment. No communication, no consultation, no discussion, nothing. The only access we've had to communication with the applicant is the option of showing up to hearings at far flung hotels, on dates announced at short notice and always in inconvenient blocks of 4 days. The alternative is to follow the proceedings online but many elderly and disabled people not only don't have access to computers or smart phones but have no WiFi, often due to economic disadvantage as much as barriers to engage with technology. Women's access, as the main carers of children and elderly people, has also been disregarded. Their access to hearings, whether online or otherwise is impacted by their caring responsibilities. Clustering hearings together over 4 long days is clearly for the benefit of the applicant and the inspectorate teams and despite raising this for months these schedules have on the whole continued.

The applicant has repeatedly referred to their, 'Equality Impact Statement', which I think it's fair to say everyone involved knows to be wholly inadequate. As someone who has been very active in working with local people to help them engage with this consultation process I can testify that I have not met one single person here who has been consulted about their protected characteristic needs as regards this application, the consultation and the proposed project itself. Offering cups of tea and hearing loops at far flung hotels just doesn't cut it. There are thousands of elderly and disabled people here who have no idea what is being proposed and there are also thousands of women who are caring for these people who have no time to wade through the reams of complicated information being shared. I have heard the applicant repeatedly assert that their materials are written in 'plain English', this is completely untrue. I'm a teacher who worked for Citizens Advice for 7 years. I was responsible for writing website content and other advice materials for the public and I can attest as someone fully trained and versed in presenting complex information in plain English that no attempt at all has been made to present anything that's been shared as part of this consultation using recognised plain English techniques. As I've said more than once at hearings, I'd have been happy to use my skills to help remedy this.

If M&M can afford to pay, transport, accommodate and feed the huge teams they seem to need continually with them, they can afford to make sure local people know what's being asked of them. I would have expected at the very least regular post outs to ALL Fylde addresses, posters in every public building and local TV information broadcasts but instead we've had nothing. Some have reported that a thick, glossy information pack came to some addresses a couple of years ago but apparently most of these were accidentally sent to the Isle of Man, where for reasons no one can fathom it seemed impossible to retrieve them.

So, as regards the Equality Act I assert here that discrimination has definitely occurred, equality of opportunity between elderly, disabled and women carers and those who do not have a protected characteristic has not been neither enabled nor advanced and good relations between different groups of people impacted by this application in different ways have neither been fostered nor encouraged. Instead we have heard reference to private (ie: secret), meetings and negotiations taking place culminating in agreements shrouded by non disclosure agreements. This is both divisive and discriminatory. To summarise, I believe that the applicants and potentially the NPI itself are in full breach of all of the requirements of the Equality Act, having not afforded, 'due regard' to any of the aims within it. They have discriminated against 3 clearly protected groups and failed to foster good relations between different groups by using NDAs.

Let's not forget [REDACTED] Equestrian Centre at Wrea Green here, a community resource that has served both our disabled and able bodied residents for 40 years. Again, as far as I'm aware no meaningful consultation nor adequate EqIS has taken place and so it continues. Anything and everything is up for grabs with utter disregard, not just for the individuals impacted but for the guidance and duty of care outlined within the law and all of this conducted in the most casual, sloppy and contemptuous manner with not even a nod of compassion or empathy to the people who's lives will be devastated by this application.

I fully understand that an EqIA is not a legal requirement for the applicant nor the NPI, I also understand that you both have a moral duty of care, one which is frequently upheld by case law. For an unprecedented project of this magnitude with such huge and varied potential impacts to continually try to swerve this duty is a moral and ethical scandal and further evidences the disregard and increasing contempt the applicants have for the people of the Fylde. Continuing to disregard this duty will not end well.

Birdstrikes and risk to life

The increased likelihood of birdstrikes interfering with flights using both Blackpool Airport and BAE systems at Warton Aerodrome is a huge and real risk to life which not only M&M but Paul Forshaw when representing BAE Systems Warton have repeatedly admitted cannot be mitigated against.

Apparently when this application was first dreamt up the applicants were not even aware of the vicinity of these two airports, in particular BAE Systems Warton Aerodrome. This is beyond comprehension, not least given the Freckleton 1944 Air disaster in which 58 people including 38 children lost their lives but we witness little concern for such sensitivities from individuals who have most likely never visited Freckleton, nor met a single person who lives there. The people who

live along the busy flight path of Blackpool Airport have similar fears. The fact that meetings between M&M and BAE can be subjected to NDA's is scandalous - what kind of world do we live in that discussions around such an important and potentially dangerous matter can be held behind closed doors and hidden from those most impacted? We know that BAE is objecting to this and strongly resent the tone of the hearings where the implication is that the purpose of the discussions is for M&M and the NPI to cosily seek a suitably worded 'solution' to enable the application to succeed, rather than to ensure the safety and well being of residents. We know that BAE have spent years monitoring the behaviour of the birds in their vicinity and accept that there is an ever present low level birdstrike risk, but this cavalier attitude to increasing this is both lazy and crazy.

Applicants integrity, capability and suitability

This 11yr project will plough through and unsettle the entire Fylde and the negative effects ripple and cascade all the way from the heart of Blackpool itself to Preston for generations to come. The sub-stations would be the largest built in a built up area ever. All these 'unprecedented' factors and yet we are expected to trust people who have repeatedly attempted to control a narrative that ricochets all over the place from hearing to hearing, by embedding crucial information in lengthy incomprehensible documents discussed at inaccessible venues miles away from the locations most affected. There has been no consultation, just control, deception, distortion and efforts to ridicule. How the NPI can sit and watch this immoral and contemptuous spectacle unfold and give this application serious consideration is a mystery.

The behaviour of the applicants and the utterly confused, contradictory, disjointed and altogether unclear state of the application itself, must surely leave the NPI no option but to disallow it as unjust, unclear, unethical and entirely unsafe. I place my trust in our NPI to do the right thing and disallow this application in its entirety.

Ros Forsey

Squires Gate resident

United Fylde Residents Groups