

The proposed development continues to raise significant environmental, community, and economic concerns that remain inadequately addressed.

1. Peatland Management

Natural England (NE) advised that the Development Consent Order (DCO) should include a deep peat management and compensation strategy, but the Applicants have not provided this.

Impact on Deep Peaty Soils: NE highlighted that the cable route cannot avoid impacting deep peaty soils, which store 26 times more carbon than forests. The Applicants claim post-ISH4 that peat disturbance is unlikely, but NE may lack resources at this late stage to verify or refute this claim.

Lack of Restoration Commitment: There is no commitment to restore affected peatlands, raising concerns about long-term environmental damage.

2. Sand Dune Impacts

The proposed development threatens the stability of sand dune ecosystems, which have already lost 80% of their extent over the past 150 years, reducing their flood protection capacity. Concerns include:

Sediment Management: NE advises that further details are needed on where excavated sediment will be stored and how this informs the coastal processes impact assessment.

Direct Pipe Trenchless Technique: Insufficient information has been provided to assess the potential impacts of this technique on sand dunes.

Construction Impacts: The use of heavy machinery and vehicles risks destabilizing dunes through soil compaction, vegetation destruction, and altered dune morphology.

3. Renewable Energy Backlog

The national queue for energy projects exceeds 750GW across all generation types, far surpassing the 220GW of clean energy needed by 2031. Key points:

Limited Contribution: The proposed 1.98GW capacity represents less than 0.3% of the backlog, undermining claims of national significance.

Maximizing Existing Infrastructure: Greater focus should be placed on optimizing output from existing turbines rather than developing new, environmentally sensitive sites.

4. Natural England's Risk and Issues Log

The Examining Authority (ExA) noted in the Rule 17 letter that NE's Risk and Issues Log [REP5-177] at Deadline 5 still contains numerous red and amber issues, indicating serious unresolved concerns. These include ongoing discussions and outstanding areas of common ground, reflecting the complexity and inadequacy of the Applicants' responses.

5. Fairhaven Saltmarsh Mitigation

Mitigation measures proposed for Fairhaven Saltmarsh are insufficient to ensure no adverse effects. Key concerns include:

Sanderling Sensitivity: Sanderlings, a declining species sensitive to habitat disruption, rely on specific coastal habitats.

High human activity at Fairhaven Saltmarsh, including recreational use, disturbs their feeding and roosting, reducing foraging efficiency and increasing energy loss (Thomas et al., 2003, Biological Conservation; Pfister et al., 1992, Conservation Biology).

Lack of Alternative Sites: There are no suitable alternative areas for displaced waterbirds, and no plan addresses how mitigation sites will support both displaced and existing species.

NE's Concerns: NE has consistently questioned the suitability of Fairhaven Saltmarsh as a mitigation site due to its heavy visitor use.

6. Ribble and Alt SPA/Ramsar Site

Adverse effects on the integrity of the Ribble and Alt Special Protection Area (SPA) and Ramsar site cannot be ruled out.

Key issues include:

Species-Specific Requirements: Shorebirds like sanderlings depend on specific stopover sites during migration, and habitat degradation poses significant risks (Galbraith et al., 2014, Global Change Biology).

Uncertain Mitigation: NE notes that proposed mitigation measures may not adequately address impacts, and it cannot be assumed that birds will utilize alternative sites if already suitable sites were available.

7. Ornithological Impacts at Fairhaven Saltmarsh

The Applicants have failed to provide sufficient details to demonstrate effective mitigation for wading birds. Key issues include:

Inadequate Plans: Proposed measures do not adequately offset construction-related disruptions, such as habitat fragmentation, noise, and disturbance, which exacerbate pressures like recreational disturbance, avian flu, and climate change.

Lack of Specificity: There is no clarity on which local groups the Applicants will collaborate with or how mitigation will be implemented.

Permanent Impacts: The permanent destruction of nearby Biological Heritage Site (BHS) ponds at Lytham Moss and unresolved wildlife disruption issues highlight the plan's failure to address cumulative ecological effects.

8. Agricultural Land and Cultural Heritage

The proposed development threatens agricultural land, which forms the backbone of community, culture, heritage, and economy.

Restoration Challenges: Restoring well-developed agricultural land, shaped by centuries of considerate practices and natural processes, is deemed impossible.

Inadequate Responses: The Applicants dismiss concerns as negligible or easily addressed, which is insufficient given the significant environmental and cultural stakes.

9. Design Phase Details

The absence of detailed design phase submissions until after plan approval is concerning. Current details are complex and inaccessible to laypersons, hindering informed public participation and assessment of environmental and individual impacts.

10. Offshore Ecology and Procedural Issues

The ExA's Rule 12 letter requested NE to submit all required information by Deadline 6. However, NE's response to the Rule 6 letter (11 April 2025) highlighted resource constraints, limiting their ability to fully assess the complex project demands. Key issues:

Late Submission of Information: The Applicants' submission of new and updated information (e.g., green belt impacts, ecology) late in the examination process contravenes the Planning Act (para 44), which requires adequate preparation for efficient examination.

Complex Documentation: Over 1,000 documents, requiring extensive cross-checking, overwhelm laypersons, preventing them from fully understanding potential consequences.

11. Green Belt Impacts

The National Planning Policy Framework (NPPF) emphasizes openness as a key characteristic of Green Belts (para 142). The proposed development undermines this principle. Key concerns:

Understated Harm: The Applicants' Greenbelt Technical Note downplays localized harm by focusing on temporary effects (up to 5.5 years) and claiming minor/negligible impacts to the wider Green Belt. However, localized impacts, particularly in Newton, are significant due to flat, permeable soils prone to erosion during wet Lancashire winters.

Cumulative Degradation: Even small-scale impacts can accumulate, leading to a "death by a thousand cuts" scenario that fragments habitats, reduces biodiversity, and weakens Green Belt purposes (NPPF, para 153).

Inadequate Site Selection: Supported by local MPs, Fylde Borough Council (FBC), South Ribble Borough Council (SRBC), NE, and Lancashire County Council (LCC), concerns remain that Green Belt designation was not adequately considered during site selection, despite viable alternatives.

12. Substation Development

The scale and location of the proposed substation within the Green Belt are inappropriate, causing significant harm to openness and rural character. Key issues:

Landscape and Visual Impacts: The Environmental Statement (ES) rates construction views from Newton footpaths as "major adverse," with noise, dust, and lighting affecting up to 200 residences and users of Public Rights of Way (PROW).

Cable trenching (up to 1km south) creates a visible "construction corridor."

Irreversible Damage: Soil compaction in Fylde's clay-rich soils and habitat disruption for ground-nesting species cannot be fully mitigated. The ES notes medium indirect impacts on Fylde Landscape Character Area (LCA) ecology, exacerbated by HGV traffic (up to 200/day) on narrow lanes.

Inadequate Justification: The 22-hectare development for less than 2GW is unjustified when smaller designs could utilize non-Green Belt land. The BRAG appraisal's amber rating for Green Belt prioritizes cable length over protection, ignoring viable alternative routes.

13. Cumulative Impacts

The cumulative effects of multiple construction sites significantly undermine Green Belt functionality and ecological integrity. Key concerns:

Combined Project Impacts: The separate submission of generation and transmission assets obscures their combined ecological and socio-economic consequences.

Unresolved Harms: The Applicants have not adequately considered alternatives, such as utilizing existing infrastructure, leading to unnecessary environmental and community impacts.

14. Inefficiency and Disproportionate Impacts

The proposed plan is neither efficient nor economical, conflicting with the Planning Statement and the Electricity Act 1989. Key points:

Cost Inefficiency: Adopting the northern route via Stanah could save £903 million for developers and consumers.

Disproportionate Harm: The development's impacts are disproportionate compared to similar projects in less sensitive areas, particularly given the destruction of Green Belt, ancient woodland, and critical habitats, which contradicts green energy principles.

15. Community and Environmental Consequences

The plan's detrimental environmental, community, and economic impacts are deemed unnecessary and unacceptable. Key concerns:

Unresolved Issues: Numerous concerns raised by NE, local authorities, and communities remain unaddressed, with insufficient information provided.

Community Sentiment: Local residents feel they will bear significant impacts without clear benefits, particularly in sensitive areas like Newton.

Long-Term Risks: The precedent of allowing multiple small-scale developments risks eroding Green Belt protection, diminishing its perceived value and enabling larger future developments.

The proposed development fails to address critical ecological, cultural, and procedural concerns. The Applicants' dismissal of impacts as negligible, late submission of complex information, and inadequate consideration of alternatives undermine the plan's legitimacy.