

## Melissa Whitlock

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**Sent:** 31 October 2025 07:00  
**To:** Morgan and Morecambe OWFTA  
**Subject:** Deadline 7 Submission - IPR: 20054040

**Follow Up Flag:** Follow up  
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**Categories:** Post-exam submission

Good Morning

I hope you are well.

I am hoping you will please kindly accept my late submission Closing Statement for Deadline 7. -

### **Applicant submissions at Deadline 6**

Are we expected to review over 180 extremely lengthy, integral and complex documents in 3 working days? The Applicants Deadline 6 submissions were uploaded onto the Planning Portal on 24th October with End of Examination on the 29th October. With all the will in the world It is near impossible to assess these documents fully and provide an adequate response.

If further documents are submitted by the Applicant these will not be able to viewed, examined and/or commented on by parties. This is wholly unacceptable in an Examination process.

### **Examination Timetable Revisions**

The revision of the timetable as requested by the Applicant are seemingly unjust and lie in the Applicants favour. From commencement of the Examination, many Consultees stated they had limited capacity to respond to deadlines and I believe this limiting factor ought to have been considered during revision of the timetable.

### **Outstanding Issues**

A large number of critical issues remain unaddressed by the Applicants. These unresolved matters undermine both the integrity of the examination process and the reliability of the Application itself.

### **Inadequate Environmental Assessment (EA)**

The EA contains serious and material gaps. The project has not been sufficiently assessed, appraised, or mitigated to enable an informed decision.

### **Landscape**

The development would (a) significantly degrade the quality of the local landscape and have a significant adverse impact on local landscape character. (b) The development would not contribute positively to the maintenance and enhancement of local character, identity and distinctiveness. (c) The development would not protect or enhance a valued landscape. (d) The introduction of new huge

substations would bring further impacts to the visual characteristics of the area. This is considered to result in harm to its character and the Application should be refused as such.

### **Connection Security**

Recent discussions between Fylde Borough Council and Ofgem indicate that the Penwortham connection offer assumes completion by 2030—an unachievable timeline. This contradicts the Applicants’ request for a seven-year commencement window (to 2033), with a three-year construction period potentially extending completion to 2036, excluding delays.

The primary reason for rejecting Stanah—insufficient time for network upgrades—lacks credibility given the 11-year window to 2036. Other justifications also fail:

Stanah is not fully encircled by residential development (adjacent on two sides at most; see Ordnance Survey extract in the Statement of Benefits and Harms);

Environmental impacts would be markedly lower than the Penwortham route: a 2 km cable corridor versus 30 km, with substations in an industrial zone rather than a sensitive rural residential area.

### **Biodiversity Net Gain**

The Applicants’ Biodiversity ‘Benefit’ Supporting Statement (REP5-145, Table 3, pp. 15–16) confirms a net biodiversity loss. Public authorities must consider actions to conserve and enhance biodiversity under s.40 of the Natural Environment and Rural Communities Act 2006 (as amended by the Environment Act 2021). Approving a project that fails to conserve biodiversity contravenes this duty.

Natural England (REP6-190, Q4) warns that drilling less than 15 m below Lytham Beach dunes risks impacts on Ground Water Dependent Terrestrial Ecosystems. As the Applicants classify these dunes as irreplaceable habitat (e.g., REP5-151), and would be drilling c10m, this constitutes a further biodiversity breach.

### **Bird strike**

The unresolved risk of increased bird strikes at Blackpool Airport and BAE persists, despite an agreement with Blackpool Airport’s owners. This This issue ought to have been considered much earlier in the Examination process.

I strongly urge that The Secretary of State considers carefully the overwhelming evidence to refrain from approving this Application.

Christine Abbott