



Morgan and Morecambe Offshore Windfarms:
Transmission Assets Consultation Team

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Dear Sir/Madam

TOWN & COUNTRY PLANNING ACT 1990 (as amended)
MORGAN AND MORECAMBE OFFSHORE WINDFARMS: TRANSMISSION ASSETS

Thank you for your consultation on the proposed connection of the Morgan and Morecambe off-shore wind farms to the National Grid.

Introduction

Fylde Council is supportive of the overall approach to delivering low carbon energy, however, this should not come at a cost to other important matters and impacts on local communities. Having reviewed the pre submission documents, Fylde Council has concerns regarding the project which it considers must be addresses prior to the submission of an application to the Secretary of State.

Fylde Council's response to the consultation has been drafted to concentrate on the elements of the project it considers it can add value to the decision-making process. The absence of comments on detailed ecological impacts or flood risk, for example, should not be taken as a lack of concern, but that these matters would be better addressed by other parties such as Natural England and the Environment Agency.

General approach to consultation

The council has reviewed the submission documents and has significant concerns regarding the consultation documentation.

Firstly, there is repeated reference in the consultation documentation to details of various elements of the proposal not having been finalised. This includes, but is not limited to, the route of the proposed cabling, the design and technology to be used in the construction of the proposed sub stations and the provision of compensatory habitat required to address Biodiversity Net Gain. Whilst it is

appreciated that such matters may not have been available during the non-statutory consultation when the views of the local community were sought to help inform the design parameters of the project, it is considered that the design of the scheme should have reached a much more advanced stage. As matters stand, there are many questions on which the local authority and community are unable to provide meaningful responses and so the pre-application has taken place prematurely. The Planning Inspectorate advise that *“The length of time taken to prepare and consult on a project will vary depending upon its scale and complexity.”* The Morgan and Morecambe Offshore Windfarms: Transmission Assets is a significant project, and many conflicting interests will need to be balanced during the decision-making process. Fylde Council considers that there should be further community and stakeholder engagement ahead of the formal submission of the proposal to the Planning Inspectorate to allow the views of the local community to be obtained and any matters more fully assessed at a time when the project is further developed.

In addition to the lack of certainty regarding the scheme that is being consulted upon, the council is concerned that the consultation material has not contained sufficient detail to allow an assessment of potential impacts to be considered. In particular, based on the summary documents that have been produced it is difficult to understand the siting of infrastructure and cable routing. Whilst additional detail is contained in the on-line documentation, many members of the community have not been able to locate this information amongst the extensive documentation contained in the PIER.

The location of the substations in relative close proximity to established residential settlements and individual residential properties is of concern to the council and the lack of detailed information to allow an assessment of these impacts heightens that concern. It also seems that the opportunity for those property owners to fully appreciate the potential location and scale of the infrastructure relative to their property undermines the value of the consultation process at this stage.

Planning Policy

Green belt

Details of the site selection process for the assets are addressed in the PEIR. Volume 1 Ch 4 Table 4.6 advises: *“The site selection chapter (Sections 4.10, 4.11 and Table 4.12: Onshore Substations Search Area RAG Appraisal Rating of this chapter) has identified areas within the Green Belt and how the Transmission Assets have been sited to avoid such areas where practicable or identify the need for consultation with the local planning authority with respect to the development, and to minimise potential environmental impacts. Further assessment on geological assets is considered in in Volume 3; Chapter 1: Geology, Hydrogeology and Ground Conditions of this PEIR, with ecology considered in Volume 3; Chapter 3: Onshore Ecology and Nature Conservation of this PEIR, and potential landscape impacts considered in Volume 4; Chapter 1: Seascape, Landscape, and Visual Impact Assessment of this PEIR”*

Volume 1 Ch4 Table 4.13 – *“A small western part of the zone is within the Green Belt under the Fylde Local Plan to 2032 Strategic Policy GD2; development must protect, enhance or restore landscape character, as appropriate.”*

The Preferred Morgan and the Morecambe Option 2 (South) onshore substation sites are both located entirely within the designated green belt. There is no evidence contained within the documentation that demonstrates how the site selection process has been carried out and why it is necessary to locate these very large structures in the greenbelt. On the contrary, the site selection criteria set out above has not been followed in selecting the site. Instead, there appears to be a reliance on being able to demonstrate very special circumstances, but before jumping to this justification, Fylde Council considers that alternative sites located outside the green belt must be first considered.

The impact of development on the openness of the greenbelt is capable of having both spatial and visual aspects. The assessments that have been made appear to rely on the Landscape and Visual Impact Assessment of the visual aspects of the substations. There is little, if any, assessment on the impact of the proposed development on the spatial impact of the development. The visual impact of the proposed substations is addressed further below, but it is considered that there needs to be further assessment of the spatial impact of the substations on the openness of the green belt and its policy objectives. An assessment of these two aspects of openness is required in order to fully inform the weight to be applied to very special circumstances in reaching the final decision.

Wherever the substations are located, it is essential that the technology used minimises the need for the substations, the size of the structures required, and/or delivers the structures in a disaggregated form to minimise their visual impact in the landscape.

Area of Separation

The area of separation (Policy GD3) in this part of the borough seeks to maintain the gap between the settlements of Kirkham and Newton. The policy seeks to exercise a greater control over the location of inappropriate development than in the wider countryside allocations set out under policy GD4. The Morecambe Option 1 (North) onshore substation site is located entirely within the area of separation. The location of this substation in an area intended to remain free of development would be contrary to the provisions of this policy. It would be necessary to demonstrate material planning considerations as to why this site is required for development having ruled out other potential locations. No attempt to demonstrate this site selection process is presented and so the documentation and this aspect of the proposal is flawed in that respect.

Sterilisation of Allocated Development Sites

The proposed route of the cables in key locations, such as around Blackpool Airport, Queensway and to the east of Freckleton remains undefined. The route passes over or close by a number of sites that are allocated for development in the Fylde Local Plan to 2032 (incorporating Partial Review). There is, therefore, potential for the cables themselves and the required easement areas around them to sterilise the development potential of these allocated sites and so adversely impact the delivery of the development plan objectives. In addition to potential physical impacts, there is also potential for impacts from Electromagnetic Fields to adversely impact upon air navigation aids. It is noted that the proposed cable route runs in close proximity to both Blackpool Airport and Warton Aerodrome and the proposed substations sit beneath the approach to the main runway at Blackpool Airport and are relatively close to BAE System's Warton site. Both airfields contain active runways where such navigation aids are critical to their safe continued operation. In turn these sites provide a significant economic benefit to the borough and so any potential impact on air navigation and air safety must be ruled out to the satisfaction of the operators of those facilities.

Impact on Agriculture

The cable routing crosses large parts of the rural Fylde that are in active agricultural production. The Department for Environment, Food and Rural Affairs Magic Maps indicate that much of route is classified Grade 2 and so regarded as Best and Most Versatile land (BMV). Agricultural activity in Fylde is characterised by a relatively large number of small agricultural holdings, but taken in combination, their contribution to the rural economy of Fylde is significant. The proposed cable routing crosses numerous agricultural units that would therefore inevitably be subdivided during the construction phase. The width of the construction corridor will have a relatively greater impact on these smaller

agricultural holdings than would be the case on larger farms, as the land taken during construction would be proportionally greater. In the longer term, cable easements would mean that the availability of land to site agricultural buildings would be restricted and would have an impact on the sustainability of individual businesses, the rural economy as a whole and ultimately the character of the wider rural area. The siting of access points to the cable joints would also potentially impact on the efficiency of agricultural holdings. It is considered that greater consideration needs to be given to the routing of cables across individual agricultural holdings in order to prevent subdivision and loss of productive land. This is a further example of how the consultation on this project appears to be premature as the necessary design details that would allow more effective consultation are simply not available.

The indicated width of the construction corridor is 122m. Much of this is accounted for by the proposed linear storage of topsoil and subsoil during construction. The utilisation of a series of top and subsoil storage areas could reduce the width of the construction corridor by approximately 40% and reduce the adverse impact not only on agricultural holdings but on ecology, transport infrastructure and reduce the development footprint of the project as a whole.

Finally on this point, as the majority of the agricultural land that the project crosses is regarded as BMV, if the project goes ahead, it is essential that the land be reinstated to a high quality that does not impact upon the long term viability and sustainability of the individual agricultural units.

Landscape Impact

The design of the substations has not yet been finalised. However, from the information that is available, it is clear that the massing of the proposed structures required to house the equipment will be significant. Fylde has a flat, rolling, rural character interspersed with limited tree cover (the area of tree cover has been identified as falling within the lowest 10% of all English local authority administrative areas). The visual impact of such large structures in the wider landscape, particularly in the rural area will be significant. The structures will appear as dominant discordant features in the rural landscape. The nature of the landscape will mean that there is little in the way of topographical features that will help integrate the structures into the landscape. Due to the height of the structures, it will not be possible to provide any meaningful landscape screening, particular when viewed across the wider landscape. Further consideration needs to be given to the scale and location of the proposed substations.

Noise Impact

The Council remains concerned that the impact of noise on local communities both during the construction phase and the long-term operation of the sub stations in particular. As the construction will largely take place in, and the substations will be located in, rural areas where the background noise levels are relatively low, there is clearly a greater potential for noise disturbance emanating from the development. It is essential that any impact of noise disturbance has regard to the impact on residential amenity rather than using higher WHO thresholds that are based on potential impact on Human Health. As details of the technology that will be utilised in the substations are clarified, the council would wish to be involved in further discussions in regard to potential noise impacts.

Impact on Wildlife and Habitat

Fylde Council notes that the views of Natural England have been sought as part of the consultation process and so are content that they take the lead in the assessment of any ecological impacts. It is noted that the consultation material includes proposals to use Horizontal Direction Drilling to minimise impact on sensitive habitats. In the event that consent is granted for the development, it is

considered essential that this aspect of the proposal is continued through to delivery of the project and is not “watered down” as a result of any future review of the project.

Cumulative Impact

In addition to the cumulative impact of the infrastructure required to service the two wand farms, there are a number of development commitments in the locality of the proposed substation sites that need to be taken into consideration in an assessment of cumulative impact on the local community. There are several large scale solar farms which have been constructed recently or have planning permission and are awaiting project initiation. These facilities are generally located in the countryside and their impacts on the local landscape have been carefully assessed. The impact of further large scale utilities will add to that impact. It is considered that the assessment of the visual interrelationship of the proposed substation sites to these neighbouring facilities needs to be developed further.

Community Benefit

For the reasons set out above, Fylde Council has significant concerns about the nature of the proposed development, its potential adverse impact on the local area and the absence of detail in the consultation submission.

If ultimately it is considered that wider national and global benefits of the scheme outweigh the concerns expressed by the council and the local community, it is considered that there should be some recognition for the impact that this national project will have on the local area. To this end Fylde Council would wish to discuss the potential for the green energy produced by the project to more directly benefit local communities, for example by providing cheap green energy to local schools and other community facilities and/or through supporting the provision of community facilities that would benefit the local community.

Fylde Council has significant concerns regarding the potential impact of the proposed development on the local area and regarding the lack of detail available to inform their assessment of the impacts of the development at this stage. Council officers and elected members will be happy to engage with the development team to discuss any of the aspects set out above, but at this time and having considered the wider benefits of the proposal, the council objects to the proposed development.

Yours faithfully



Mark Evans
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