



Written Representations

– Deadline 1

**Morgan & Morecambe Transmission
Cables Examination
IP Reference-20053931
May 2025**

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1. Approach

- 1.1 Fylde Council [FBC] is a statutory consultee and Interested Party with reference to the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets development.
- 1.2 This Written Statement [WS] is submitted at Deadline 1, alongside a Local Impact Report [LIR]. Whilst FBC acknowledges that the purpose of the LIR is typically to set out an evidence-based assessment of the likely impacts of the proposals, as set out in the LIR and expanded upon in this WS, FBC considers that the submitted Environmental Statement [ES] does not enable such a primarily objective assessment.
- 1.3 This means that there is overlap between the LIR and WS in terms of the issues covered. However, FBC considers that both the LIR and WS are relevant and not duplicative – the WS provides a clear explanation of the authority's view on the application and comments on the planning balance, whereas the LIR focuses on interpreting and appraising the evidence.

2. Policy Context

National Policy and Guidance

- 2.1 The National Planning Policy Framework [NPPF] is a material consideration for the assessment of NSIPs and as such has been referred to as appropriate within this LIR.
- 2.2 There are a number of National Policy Statements which are relevant to the assessment of NSIPs, the most pertinent being EN-1, EN-3 and EN-5.
- 2.3 These proposals are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [the EIA Regulations].

The Development Plan

- 2.4 The Fylde Local Plan to 2032 (incorporating Partial Review) [FLP] is the extant plan for Fylde. The relevant policies are referenced throughout the LIR as appropriate. Links to the Local Plan are provided in appendix 2 to this report.
- 2.5 FBC has published its Local Development Scheme 2025 which sets out the programme for the production of the next Local Plan. The existing Local Plan will be five years old from adoption in December 2026. Initial stages of preparation of the new plan have commenced, including the issue of a call for sites. It is intended to undertake a Regulation 18 consultation in August-September 2025. Consideration of sites through the Strategic Housing and Economic Land Availability Assessment process will run from May to October 2025. Publication for consultation under Regulation 19 stage is scheduled for May-June 2026, with submission proposed for August 2026.
- 2.6 The new plan will run to 2042, ten years on from the existing Local Plan. Initial intentions are that the new plan will incorporate existing policies where possible, although that is subject to the outcomes of the Regulation 18 stage.

3. The Authority's View

Structure

- 3.1 In order to appropriately set out the Authority's views and comments on planning balance, FBC has structured this WR with reference key topics as set out below. FBC has been mindful of the list of matters covered in Issue Specific Hearing 1 and refers to these where appropriate.
- Draft Development Consent Order
 - Environmental Statement
 - Economy
 - Environment
 - Human Health

4. Draft Development Consent Order

- 4.1 FBC notes that the DCO is the most significant output of the Nationally Significant Infrastructure Process [NSIP] because, alongside other matters, it should define the works which have been approved and should set out the requirements which will control the construction, commissioning, operations and decommissioning of the approved works.
- 4.2 The applicant confirmed at Specific Issue Hearing 1 that the Rochdale Envelope approach was being used, seeking to set out the worst-case scenario of development. However, the guidance (Paragraph 008 Reference ID 04-008-20240430) requires that the parameters used must be no more than necessary to accurately contain the proposed development. This goes on to explain that where the final positioning of works is to be secured by detailed design, these must be accompanied by the precise location of works, subject to limits of deviation.
- 4.3 The dDCO does not include such locations and limits, for example with regards to dams in the dune areas and junction boxes along the route.
- 4.4 As set out in more detail in its LIR, FBC expects an updated dDCO to be provided which addresses two main issues. First, the ES is deficient and therefore the dDCO cannot be accurate and effective. Second, the dDCO does not provide appropriately specific controls to ensure that the works are carried out in a way which appropriately reflects the assessment in the ES and also which enables appropriate control with reference to requirements to be discharged by FBC.
- 4.5 FBC also considers that similar issues exist with regards to protected provision but at this stage defers these matters to Lancashire County Council [LCC] and other statutory undertakers as appropriate.
- 4.6 For development which will have such significant, long-term impacts over a large part of Fylde, FBC is of the opinion that it is unacceptable that the dDCO does not properly define the works or control the construction, commissioning, operations and decommissioning.

5. Environmental Statement

- 5.1 The EIA Regulations set out a requirement for the Environmental Statement [ES] to describe the aspects of the environment likely to be significantly impacted by the proposals, with specific reference to a range of topics. FBC notes the range of topics identified in the submitted ES and also summarised by the topics specified by the ExA to guide the examination.
- 5.2 At a high level, FBC is of the opinion that parts of the ES are inappropriate, incomplete or inconsistent. Details were notably provided through Relevant Representations [RR-0705] with further explanation provided in the LIR submitted alongside this WR. This has two main implications. Firstly, it inhibits proper assessment of the potential impacts and all work following on from this, including but not limited to design of mitigation, monitoring and management. Secondly, it makes the process more difficult for interested parties to engage with and reduces the confidence of members of the public that matters are being appropriately addressed.
- 5.3 Furthermore, FBC is of the opinion that topics relating to: Human Health and Recreation; and, Risk Management and Resilience, should also be identified and used for the purposes of structuring the examination.
- 5.4 In terms of Human Health, FBC considers that this position is supported by Paragraph 4.3.2 of EN-1 as well as the requirements of the EIA Regulations, which include specific reference to consideration of the effects on human health. This is explained further under the 'Human Health' heading later in this WR.
- 5.5 In terms of Risk Management and Resilience, Paragraph 4.3.3 of EN-1 and the EIA Regulations set out a requirement assess *"the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects."*
- 5.6 The LIR submitted by FBC sets out in detail matters relating to risk and resilience, summarising that large infrastructure projects of this scale inevitably introduce a range of risks to the local environment, businesses, community and service resilience, particularly during the construction and decommissioning phases. The current proposals lack sufficient detail, assessment and control, and the impacts are potentially so significant that such matters must be considered as a discrete topic.

6. Economy

- 6.1 Paragraph 4.2.12 of EN-1 clearly requires applicants to set out how residual impacts of the development will be compensated for as far as possible and should also set out how any mitigations or compensation measures will be monitored, and reporting agreed to ensure that action is taken. This recognises that not only is there a need for the proposals to identify the potential impacts but also to set out a detailed strategy for managing those impacts.
- 6.2 Chapter 8 of the FLP sets out that the preservation and development of a strong, vibrant and sustainable economy is a high priority. The LIR submitted by FBC alongside this WR provide more detailed assessment of the likely economic impacts. This includes impacts on specific, significant economic infrastructure such as Warton Aerodrome, tourism and agricultural land.

These impacts are exacerbated by the high degree of flexibility sought and lack of detail provided by the applicant, for example in terms of build-out scenarios.

- 6.3 FBC considers that the proposals are not supported by sufficient information to meet the requirements of EN-1. For example, a key reference in terms of managing economic impacts is the Outline Employment and Skills Plan [APP-239]. The commitments in this plan are often vague typically setting out “encouragement” or “support” (for example within Table 1.4), with no specific actions or control mechanisms presented.
- 6.4 FBC notes that the applicant is of the opinion that a s106 or other legal agreement will only be required for a narrow range of specific impacts, such as at Blackpool Airport or Blackpool Road South playing fields. FBC is of the opinion that a broader s106 will be required to adequately secure compensation for the residual impacts and that this should sit within the DCO along with details of the monitoring and reporting procedures.

7. Environment

- 7.1 Section 5.4 of EN-1 sets out requirements relating to biodiversity and geological conservation.
- 7.2 Section 5.4.21 goes on to explain that energy infrastructure projects have the potential to deliver significant benefits and enhancements, beyond Biodiversity Net Gain, which would result in wider environmental gains.
- 7.3 The Coastal Change Management areas in Fylde are particularly sensitive to change and include the Ribble Estuary SSSI and adjoining Lytham St. Anne's Dunes SSSI which in turn support Sand Lizards which are a priority species, protected under the Wildlife and Countryside Act, 1981. The proposed development will impact upon these areas and it is very concerning to see a lack of detail about what is proposed. For example, the timing, duration and frequency of works, the access management, the size, number and location of build infrastructure, all within these sensitive areas are not specified.
- 7.4 The Relevant Representations and LIR submitted by FBC, as well as submission by other interested parties, provide extensive detail of where the applicant's submission is incomplete and inaccurate with regards to ecological assessment.
- 7.5 Section 5.4.22 of EN-1 goes on to specifically require that NSIP proposals consider the move of mobile and migratory species. FBC notes that a significant unresolved matter relates to the fact that the applicant has not provided proper information relating to impacts on birds and proposed mitigation.
- 7.6 As a result of these issues, FBC is of the opinion that the ES and proposals which flow from it do not meet the requirements of EN-1.

8. Human Health

- 8.1 Chapter 4.4 of EN-1 relates to health and sets out that whilst access to energy is clearly beneficial to society and health as a whole, the construction and operation of energy infrastructure may have negative impacts on health. FLP echoes this at page 179, noting that renewable energy has a link to health and wellbeing.
- 8.2 EN-1 goes on to give examples of the types of impacts on health, which notably includes: increased traffic; dust; and noise. Whilst FBC is concerned about these impacts across the lifetime of the development, they are likely to be particularly pronounced during the build-out

and decommissioning phases. This means that details of the nature, timing, duration and frequency of any works are required to be able to assess the impacts of the development.

- 8.3 The Relevant Representations and LIR submitted by FBC set out the opinion that there is a lack of specific detail, or any evidence of meaningful engagement by the applicant with contractors and suppliers. This in turn means that the potential adverse health impacts and measures to avoid, reduce or compensate for these impacts cannot be achieved, in accordance with Section 4.4.4. of EN-1.

9. Summary

- 9.1 FBC has sought to set out the likely impacts of the proposed development within the Fylde local authority area in its LIR submitted alongside this WR. The purpose of this WR is to set out the view of FBC on the application and to comment on the planning balance.
- 9.2 In terms of being able to form a view on planning balance, FBC and its consultees have encountered a consistent problem with the ES and dDCO, this being that they are at times inadequate, incomplete and inconsistent. Any attempt to balance the adverse impacts against the benefits of the scheme must be supported by the required information.
- 9.3 Indeed, National Policy Statements EN-1, EN-3 and EN5 are predicated on balance and provisions for appropriate mitigation. This is true in the broadest sense and Section 2.6.2 of EN-1 explains that sustainable development is relevant not just in terms of addressing climate change but also because the way energy infrastructure is deployed affects the wellbeing of the environment, society and the economy. Notably here, the way in which energy infrastructure is deployed is also of central importance.
- 9.4 FBC is concerned that the applicant is not able to explain how the infrastructure will be deployed and considers that this uncertainty may be at the heart of deficiencies in the ES and dDCO. This may be why much of the information presented lacks specific or appropriate detail.

Appendix 1: List of Abbreviations

- DCO – Development Consent Order
- dDCO – Draft Development Consent Order
- EIA Regulations – Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 [the EIA Regulations]
- EN-1 – Overarching National Policy Statement for Energy
- EN-3 – National Policy Statement for Renewable Energy Infrastructure
- EN-5 – National Policy Statement for Electricity Networks
- ExA – Examining Authority
- FBC – Fylde Borough Council
- FLP – Fylde Local Plan to 2032 (incorporating Partial Review)
- LCC – Lancashire County Council
- LIR – Local Impact Report
- NPPF – National Planning Policy Framework
- WS – Written Statement

Appendix 2: Links to the Local Plan

Fylde Local Plan to 2032 (incorporating Partial Review)

Plan text (direct link):

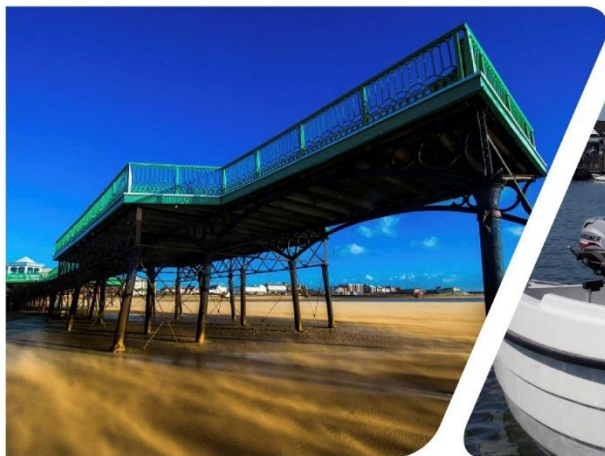
<https://new.fylde.gov.uk/wp-content/uploads/2021/12/Fylde-Local-Plan-to-2032-incorporating-Partial-Review-adopted.pdf>

Policies map (direct link):

<https://new.fylde.gov.uk/wp-content/uploads/2019/09/Policies-Map-Adopted-2018-compressed.pdf>

Local Plan webpage:

<https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/adopted-fylde-local-plan-to-2032-incorporating-partial-review/>



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Any enquiries regarding this document/publication should be sent to us at the Town Hall, St Annes Road West, St Annes FY8 1LW, or to listening@fylde.gov.uk.

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Authorised by: Paul McKim, Head of Planning and Building Control