Final Position Statement

Morgan & Morecambe Transmission Cables Examination

IP Reference-20053931

October 2025

Contents

1. Introduction and Approach

1.1.1 Fylde Council [FBC] is a statutory consultee and Interested Party for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Cables proposal.

1.1.2 This Final Position Statement [the Statement] has been prepared for submission at Deadline 7, this being the final Deadline [DL] of the Examination.

1.1.3 In preparing this Statement in accordance with Section 60(3) of the Planning Act 2008 (as amended), FBC has shown due regard to relevant guidance, including the 'Nationally Significant Infrastructure Projects: Advice for Local Authorities' published by the Planning Inspectorate on 08 August 2024 (updated 16 December 2024).

1.1.4 FBC understands that the submission of this Statement is not a formal requirement. However, given the significance, volume and timing of information submitted by the Applicants, as well as the existence of issues which FBC considers remain unresolved, it is considered useful to submit the Statement.

1.1.5 The aim of this Statement is to set out a clear position as to the FBC's position on the proposals and its opinion as to what matters would need to happen to make it acceptable, by setting out a clear pathway as to how issues can be resolved where possible.

1.1.6 This Statement does not make materially new points but does provide updates where new information has become available, or where progress has been made.

1.1.7 This Statement is not intended to be exhaustive, so as not to repeat submission already made. Instead, this Statement should be read alongside the other submissions made by FBC which notably includes:

- Response to Hearing Action Points [REP6-187];
- Post-hearing Submission [REP6-187];
- Answers to Examining Authority's Written Questions [REP5-171];
- Written Statement [REP5-170];
- Post-hearing Submission [REP4-134];
- Answers to Examining Authority's Written Questions [REP3-082];7
- Comments on Written Representations [REP2-057];
- Written Representations [REP1-079];
- Local Impact Report [REP1-078]; and,
- Relevant Representations [RR-0705].

1.1.8 The creation of this report is the work of the officers of Fylde Borough Council, and no part of this process has been generated by AI.

2 Final Position

2.1 Introduction

2.1.1 This section of the Statement is arranged by topic, in a manner consistent with previous written submissions. The grouping of the topics presented is not intended to indicate significance but instead the information has been arranged with the intention to provide a coherent overall explanation, aligned with previous submissions and notably reflecting the topics as presented in the FBC Local Impact Report [REP1-078] [LIR].

2.1.2 By organising this Statement in this manner, FBC also intends to demonstrate that FBC has raised issues consistently throughout the Examination, including those matters which FBC considers unresolved at the Examination.

2.1.3 As with the LIR, the specific topic sections are followed by comments relating to over-arching issues. It is important that the entirety of this Statement and previous submissions are considered holistically, particularly as many issues are interrelated.

2.1.4 FBC also wishes to note upfront in this Statement that a positive, proactive and collaborative approach has been taken throughout the Examination. FBC has proactively engaged with a busy programme of meetings, information sharing and problem-solving, both with the Applicants and other interested parties. This is evident at least in part for each topic, as reflected in the FBC SoCG to be submitted alongside this Statement. The best example of this approach relates to landscape, visual impacts and design – the submission of new and updated documents, notably relating to the Outline Design Principles [Applicants submissions: APP-209; REP5-064; and, REP6-109], where FBC have discussed issues and put significant work into agreeing potential methods for creating post-consent commitments and controls to address these. However, as explained in this Statement and reflected in the FBC SoCG, some issues relate to matters which it is considered could not be resolved through post-consent controls, in a way which meeting the relevant policy tests.

2.2 Site Selection – Green Belt, Landscape and Visual Effects

2.2.1 Whilst FBC has previously made comments relating to site selection, Green Belt, and landscape & visual effects separately, as set out below, it is considered that the remaining main issues relevant to these topics are interrelated, with matters relating to site selection being particularly pertinent. This opinion is consistent with the most recent FBC written submissions, notably Section 2 of the FBC Written Statement at Deadline 5 [REP5-170].

2.2.2 The ExA confirmed at Issue Specific Hearing 4 that they would not be discussing site selection and Green Belt matters (00:34:26:10 - 00:35:02:00, Transcript of Issues Specific Hearing 4 – Part 1 – October 2025). FBC notes that the ExA confirmed that they were content that they have the relevant information before them to inform a recommendation.

2.2.3 However, as reflected in the FBC Statement of Common Ground [SoCG] submitted alongside this submission, FBC and the Applicants have continued to discuss matters relating to these topics. FBC therefore considers it appropriate to provide a summary of its opinion in this regard at this stage, as it builds upon previous submissions, most notably the FBC Written Statement at Deadline 5 [REP5-170]. Indeed, Section 2.1.1 of that statement noted that engagement between FBC and the Applicants was continuing.

2.2.4 FBC maintains the view that:

- There is no operational requirement for the close-location of the two substations;
- There are no mitigation benefits of any relevant impacts and harm would be achieved by the close-location of the substations;
- The close-location of the substations is not otherwise required or inevitable – the substations could be more separately located;
- The Applicants have not appropriately considered an approach where the substations would be more separately located; and,
- It is possible that this approach could result in one or both substations being located outside of the Green Belt.

2.2.5 FBC also maintains its position that the relevant guidance, which notably includes the Horlock Rules, does not support or require close-location of independent infrastructure. Indeed, the guidance requires consideration to be given to minimising or appropriately managing potential effects.

2.2.6 FBC notes that the Applicants do not consider it necessary to consider more separate locations of the substations. FBC disagrees with this position and considers that the Applicants' assessments are therefore flawed in this regard. FBC considers that the harm is therefore not justified.

2.2.7 FBC does not consider that this issue can be appropriately addressed as the issue relates to fundamental features of the proposals, with significant other parts of the proposals built upon the Applicants' selection of the substation sites. The only potential exception to this would be where a retrospective assessment demonstrated that the current proposals were acceptable in this regard.

2.3 Local Tourism

2.3.1 As reflected in the FBC SoCG to be submitted alongside this submission, FBC considers that fundamental issues remain with regards to tourism and the related socio-economic impacts.

2.3.2 FBC makes specific reference to Section 13.8 of its LIR [REP1-078] which explains concerns about the inadequate assessment in relation to local tourism impacts.

2.3.3 FBC notes that the Applicants have provided substantially new and updated information through its first submission of a Local Tourism Assessment at Deadline 5 [REP5-142] which is welcomed and as updated at Deadline 6 [REP6-160].

2.3.4 However, FBC regards the Local Tourism Assessment as set out is not consistent and not soundly prepared.

2.3.5 The Applicants reference and show reliance on the Glasson Paper (assumed to be either the 2021 or 2022), which firstly oversimplifies its consideration and secondly misrepresents the findings in the Paper. The Paper generally finds that the Applicants do not carry out appropriate assessments, with some of the same criticisms interested parties have made with regards to scope and depth of assessment.

2.3.6 The BiGGAR reference was prepared by a private consultancy on behalf of an applicant for an OWF. Additionally, it has not been peer reviewed or provided any other relevant assurances.

2.3.7 In FBC's view, the Applicants' Local Tourism Assessment relies heavily upon these sources in seeking to justify that there would be no significant impacts on tourism and economy more generally, resulting from the proposed development. FBC considers that this position as not justifiable.

2.3.8 Regardless, FBC is also concerned that it has not been possible for a properly informed assessment to inform the assessment as it has been prepared and submitted late into the Examination.

2.3.9 Whilst FBC Tourism and Visitor officers have engaged with the Applicants, its late submission including important information has not provided the opportunity for interested parties and the wider tourism sector and hospitality businesses, to properly engage, review and comment upon these submissions. The result is that any remaining points on its inadequacy and insufficient details have not benefited from the opportunity to address issues/concerns in the time available, thereby having ineffective influence over the proposals, as well as design of mitigation and commitments.

2.3.10 FBC is concerned that the likely impacts arising on tourism have not been properly presented and assessed. As set out in all relevant written submissions, including at the beginning of the Examination through the LIR [REP1-078] and as per Strategic Policy EC6 of the Fylde Local Plan to 2032 [FLP] and its supporting text, tourism is an important industry, accounting for 1 in 10 jobs.

2.3.11 FBC considers that these issues cannot now be dealt with effectively as part of this Examination. Local businesses, residents, the impacted Authorities as well other interested parties should be provided with the opportunity to review and comment upon a proper assessment, and the proposals must appropriately respond to these matters.

2.4 Ecology and Biodiversity

2.4.1 As reflected in the FBC SoCG to be submitted alongside this submission, FBC considers that some significant issues remain with regards to onshore ecology and biodiversity.

2.4.2 FBC has engaged with its own ecological advisors and officers throughout the Examination, and has also had due regard to submissions made by other relevant interested parties. This notably includes Natural England and the Environment Agency.

2.4.3 Whilst FBC notes that significant progress has been with regards to some ecological matters, such as for mitigation of sand lizard impacts, a range of issues still remain. FBC notes that representations have been made from relevant interested parties on many of these matters, including prior to the Examination commencing.

2.4.4 FBC notes that the latest Natural England SoCG [REP6-179] still raises a number of significant issues, including those relating to matters raised by FBC. This is particularly relevant in terms of potential impacts on the Sand Dunes SSSI and surrounding coastal area, some impacts on birds, as well as impacts on agricultural land and peat deposits across the Fylde.

2.4.5 FBC further notes that some points of disagreement, such as relating to long-lasting habitat change in the Fylde Marine Conservation Zone [NE.MCZ.2, REP6-179], relates specifically to disagreement around proper modelling of the worst-case scenario. This is of relevance to matters discussed in the 'Interrelated Effects' section later in this Statement. FBC is concerned that the maximum design scenario and worst-case scenario for a range of topics has not been properly addressed by the Applicants.

2.4.6 FBC also continues to raise concerns relating to biodiversity and the suitability and capacity of land identified to provide benefit and/or gain. This is summarised most recently in the FBC SoCG to be submitted alongside this submission, with comments raised in other written submissions, including Section 10 of the FBC LIR [REP1-078].

2.4.7 FBC is also concerned the Applicants mitigation proposals for Fairhaven Salt Marshes for intertidal birds are insufficient, firstly due to its carrying capacity for intertidal waders, and secondly intensive human interactions at this location-principally dog walking in and amongst the salt marshes. FBC considers that the proposed mitigations measures will be ineffective and has looked to secure a more robust comprehensive programme secured by Section 106 as the most appropriate mechanism, which currently the Applicants reject.

2.4.8 FBC notes that Section 5.4 of EN-1 sets out requirements and expectations relating to biodiversity and geological conservation, with specific reference to different classifications of protected habitats. FBC considers that whilst significant issues remain, particularly with regards to impacts on these habitats, then the Applicants cannot be considered to have complied with the clear requirements of Section 5.4.42 of EN-1.

2.5 Agriculture

2.5.1 As reflected in the FBC SoCG to be submitted alongside this submission, FBC considers that fundamental issues remain with regards to agriculture and the related socio-economic impacts.

2.5.2 FBC notes that Applicants' Farm Business Assessment [REP6-182] provided at Deadline 6, in response to a specific request made by the ExA at Issue Specific Hearing 2 [Action Point ISH2_38]. FBC notes that this provides information relating to three landholdings, rather than for all affected agricultural businesses. FBC also notes that much of the relevant information is (necessarily) redacted and that commitments made relate to suggested future work.

2.5.3 FBC does not consider that this Farm Business Assessment, or the information otherwise submitted to the Examination, is sufficiently robust to assess and appropriately respond to the likely impacts of the proposed development.

2.5.4 Representations by affected parties have been made throughout the Examination, as well as in Section 8 of the FBC LIR [REP1-078]. These relate to both agricultural business impacts, as well as criticism of the Applicants' decision to give Grade 2 and Grade 3 land the same weight in its BRAG assessment in the Selection and Refinement of the Onshore Infrastructure [APP-033].

2.5.5 FBC considers that proper differentiation between Grade 2 and Grade 3 land must be made to inform any site selection refinement process. FBC also considers that an assessment of the likely impact on all farm businesses, based upon sound information, must be carried out and affected parties must be given the opportunity to review and respond to these.

2.6 Aviation and Defence

2.6.1 FBC has previously made submissions setting out the requirements of Strategic Policy T2 of the FLP and Section 4.17 of EN-1, as they relate to aviation and defence. In summary, FBC notes that development should not be permitted where unacceptable risk or interference with defence.

2.6.2 FBC notes the submission made by BAe Systems at DL6 [REP6-206] clearly states that they are not in a position confirm that proposed development complies with EN-1. FBC also notes the actions which BAe Systems considered must be completed to resolve these issues, as set out in the same submission.

2.6.3 Given that BAe Systems are the most impacted party and considered to have the most informed position when it comes to potential risk or interference to defence, FBC considers it is not possible to conclude that the Applicants have met the requirements of Strategic Policy T2 and EN-1 in this regard.

2.6.4 FBC does however note that BAe Systems expect further progress to be made, and it is therefore likely that should BAe Systems become content that the requirements of EN-1 have been met, then FBC would be of the same opinion.

2.7 Interrelated Effects

2.7.1 FBC set out early concerns relating to interrelated effects in Section 16 of its LIR [REP1-078] and sustained these throughout the Examination. FBC considers that Paragraph 4.1.5 of EN-1 is of pertinence. This requires that long-term and cumulative adverse impacts, along with any measures to mitigate or compensate for adverse impacts, should be taken into consideration when weighing the adverse impacts of the proposal against the benefits.

2.7.2 FBC notes that progress has been made in terms of setting out the likely impacts, as reflected in the FBC SoCG to be submitted alongside this submission. However, as also reflected in the SoCG and all written submissions, including this Statement, FBC considers that issues still remain.

2.7.3 At a high level, with regard to the definition of the maximum design scenario. FBC understands the Applicants' assessment in relation to the Rochdale Envelope Approach and has made comments on this, notably in Section 18.1.5 of its LIR [REP1-078]. However, it is still considered that some details are not sufficiently defined even at the outline stage to enable proper and full assessment of the likely impacts.

2.7.4 This issue exists with specific regard to matters relating to the timing, duration, frequency and characteristics of the proposed development, particularly during the design and construction phases. This issue is exacerbated by the fact that the proposal is for two completely independent developments, which creates the potential for construction activities to run up to June 2036 (assuming that the offshore DCO is made by the end of 2025) with restoration taking up to a year after that and some other mitigation measures taking much longer periods of time to embed.

2.7.5 The potential for all likely harmful impacts could be increased by an extended and uncertain development programme. FBC has consistently requested that the Applicants consider commitments and ways of working which would allow greater certainty, opportunity for control and implementation of effective mitigation where appropriate.

2.7.6 FBC notes that the Applicants have repeatedly stated that the approach being taken with this application, that two entities working together to bring forward a joint scheme, is unprecedented and that it will reduce the adverse impacts. During Issue Specific Hearing 1 (01:23:01:21 - 01:24:19:17, Transcript - Part 5 - 1 May 2025) the Applicants set out that the relevant details were set out in the Environmental Statement and that impacts would be reduced by bringing forward development in a smaller area.

2.7.7 FBC acknowledges that the Applicants have sought to justify their approach and have provided some more details but nevertheless is of the opinion that no significant evidence has been presented to support this general assertion and as it stands there is no public benefit being accrued from this approach. In fact, it is the opposite with extended construction commissioning periods, independent construction and decommissioning operations clearly introducing additional risks and harms.

2.7.8 In order to seek to resolve this issue, FBC would welcome a shorter commencement period and greater commitments in terms of collaboration between the Applicants.

3 Section 106 Matters

3.1.1 To date, Applicants have refused to engage on several important Section 106 Matters which have been endorsed by the Fylde Economic Prosperity Board (EPB) at its meeting on the 25th September 2025 and referenced in FBCs Briefing Note submitted on 30th September and accepted at ExA discretion on the 2nd of October 2025.

3.1.2 The EPB and FBC consider the matters identified below give rise to additional impacts beyond those already addressed through mitigation measures and management plans. These matters meet the legal tests in the NPPF or Regulation 122(2) of the Community Infrastructure Regulations, being necessary to make the development acceptable in planning terms, directly related to the development, and are fair and reasonably related in scale and kind to the development proposal.

- O&M1-Funding of operational and monitoring staff posts for monitoring and enforcement.
- EC1-Fairhaven Saltmarshes additional habitat mitigation.
- Impacts on water quality through direct sediment disturbance and disruption, requiring specific and specialised mitigation.
- Clifton North Road Dunes systems-significant adverse effects requiring specialist monitoring and mitigation.
- EC3-Tree and Hedge Line Replacement and Corridor Enhancement-reduction of habitat loss dislocation/connectivity and ecological impacts, applicable to Fylde and South Ribble.

3.1.3 FBC as the relevant Local Planning Authority will continue to engage with the Applicants on these matters and will raise directly with the Secretary of State of Energy Security and Net Zero at the appropriate time.

4 Matters Relating to Grid Connections/Stanah and Hillhouse Technology Energy Enterprise Park

4.1.1 With respect to matters raised by NGET [National Grid Electricity Transmissions] through their answers to written questions [REP3-088] [REP5-176].

4.1.2 As regards to limited physical capacity, whilst Stanah has residential properties adjoining its site, it also shares an extensive boundary with Hillhouse Technology Energy Enterprise Park, on which the promoters/owners have indicated they are willing to enter into discussions for upgrade and additional substation provision to meet their own needs and the wider network requirements.

4.1.3 Stanah has a 400kw connection into the "Heysham Ring" via Middleton and serves as a "step up" substation into the grid, providing the interconnection in the Grid for Walney 2 and has previously been shortlisted for other offshore interconnections.

4.1.4 A recent meeting has taken place between OfGEM and FBC on the 24th October 2025, following an exchange of letters. OfGEM confirm the Holistic Design Network Review (HDNR) was a national level assessment and that Stanah was assessed as part of this process, FBC has requested further details of this assessment.

4.1.5 OfGEM also confirmed HDNR has a critical requirement to ensure grid connections by 2030 are secured and a separate funding mechanism is available to the Applicants for whichever project comes forward first: Project A could provide elements of Project B's infrastructure. With arrangements for costs and expenditure recovery through OfGEMs 'Anticipatory Investment Policy'. Decision on the Early-Stage Assessment for Anticipatory Investment | Ofgem.

4.1.6 FBC has sought clarification from the Applicants who state this matter was dealt with in the Applicants' response to ExQ1.1.10 [REP3-056], and until each project has secured its Contract of Difference (CfD), there is no guarantee it would not be feasible for Project A to deliver transmission infrastructure on behalf of Project B, and there is currently no mechanism in place that would allow for cost recovery (clawback) in any such circumstances.

4.1.7 The Applicants also confirmed they hold grid connection agreements which are targeting connection by 2030 to support delivery of the Government's net zero objectives. Noting the connection dates remain dependent on external factors, such as the outcome of the CfD process, and no further engagement with NESO has been required at this stage.

4.1.8 FBC takes the view from evidence submitted in the Examination by the Applicants, for example REP6-039 Project Description Section 3.9.2 with the tables on the subsequent pages and Requirement 1 of the DCO-page 70 C1 MMTA draft Development Consent Order F08 F09 Tracked as well as other Outline Requirements being sought. It is very likely these projects will not be connected by 2030, and following the programming sequencing of critical events, it is more likely that connections would take place in mid-2030's.

4.1.9 This therefore questions the validity of the HDNR process as it relates to the onshore transmission assets.

4.1.10 FBC fully accepts these are commercial and operational considerations for the Applicants and NESO. However, NESO do not seem to be engaged on these matters.

4.1.11 Importantly in relation to this Examination, FBC is not aware of any scenario testing of cross projects infrastructure delivery through any hypothetical Environmental Assessments in relation to impacts and/or mitigation of harms.

4.1.12 FBC will follow up these matters with the Applicants, OfGEM and, NESO and will submit an updated Final Position Statement to the Secretary of State regarding Stanah/Hillhouse Technology Energy Enterprise Park, grid connections, and the validity of environmental assessments based on the assumption that more information on these matters will emerge.

4.1.13 FBC understands that there will be an opportunity to submit an updated Final Position Statement around the time the ExA submits its report and will continue to explore these matters.

4.1.14 FBC remains of the view that Stanah/Hillhouse Technology Energy Enterprise Park offers a better economic, social and environmental solution which would be cheaper and quicker to deliver, as well as providing a significant economic boost and power to the sub region, reduce significant environmental harms and would have the wider support of local communities.

END.

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