



Morgan & Morecambe Transmission Cables Examination

IP Reference-20053931

October 2025

Deadline 6 – Written Statement

Statement of Common Ground

FBC and the Applicants have made good progress in terms of updating their Statement of Common Ground [SoCG].

This progress has required multiple meetings, consultations and a significant amount of drafting, with the Examining Authority's [ExA] Action Points published on 14th October 2025, with Deadline 6 shortly following on 22nd October 2025.

The SoCG is not yet fully finalised and signed. Therefore, FBC and the Applicants have agreed to submit an updated SoCG as soon as possible with the expectation a copy will be submitted ahead of Deadline 7.

Blackpool Road Recreation Ground – Alternative Provision

The information attached at Appendix 1 has been prepared to evidence submitted by the Applicants at DL5 regarding potential alternative sites within Fylde for accommodating football provision suitable for St Annes Football Club.

The table included in the information provides a full response to the potential suitability for senior or junior football activity for the suggested sites as put forward by the Applicants.

Following review, no substantive changes to the content of the site assessment have been identified. However, information is added to clarify the intended meaning of references to Multi-Use Games Areas, to ensure future consultation and local context are fully considered.

New Information and Consultation

This statement is provided by Fylde Borough Council [FBC] for submission at Deadline 6 and should be read alongside the *"Response to Examining Authority's Action Points Received 14th October 2025"* [RtAP] also prepared by FBC and submitted at Deadline 6.

Comments on documents received at Deadline 5 is provided in the RtAP, either in relation to the relevant matter-specific Action Points [AP], or in response to AP44 which is a catchall for all other Deadline 5 documents.

Whilst FBC continues to work positively and proactively with all relevant parties throughout the Examination, the volume and type of new and updated information submitted to the Examination

both at and post-Deadline 5 is significant. Furthermore, the Applicants have confirmed that further information is to be submitted at Deadline 6.

It is not clear to FBC how information submitted after Deadline 5 can be properly considered by all interested parties and used to properly influence the proposals.

FBC acknowledges the Applicants most recent formal response to these concerns (Section 134.2 [REP5-121]) but disagrees with the Applicants' view that there has not been a significant amount of high level new and updated information.

Furthermore, the Applicants' assertion that any new information provided often reflects progress made with interested parties and therefore justifies its submission, has no bearing on whether the volume and type of information has been received in a timely manner.

Importantly, the Nationally Significant Infrastructure Project [NSIP] consenting process is intended to be front-loaded and the applicants are required to be well-prepared, to enable efficient examination within the maximum six months provided by Section 98(1) of the Planning Act.

Relatedly, FBC draws attention to the Government guidance note '*Nationally Significant Infrastructure Projects: The stages of the NSIP process and how you can have your say*' demonstrates the issue at hand clearly. The guidance states that interested parties (in this case members of the public) "*can look at the application documents (and) comments from all the other interested parties*" and that "*The Examining Authority must tell everyone about the examination timetable which will include: a deadline for sending any further comments about the application. (...)*"

The Rule 8 Letter [PD-007] and Rule 8(3) document [PD-014], which include the timetable for the Examination, allow one week between Deadlines 6 and 7, with no subsequent Deadlines.

It is assumed that consistent with all previous Deadlines, the information received at Deadline 6 will be published at least a few days after the Deadline. This will limit the ability of Interested Parties to review, consult and comment upon this information but it also does not allow for Interested Parties to subsequently review the comments from all other interested parties.

FBC expects that this issue will be significant, given the amount of new and significantly amended information which is likely to be submitted at Deadline 6. It is also very likely that some of the new information will relate specifically to concerns, queries and requests made by Interested Parties, including local authorities, parish council, specific community/sector interests and members of the public.

The likely impact of this is that Interested Parties have not been provided with the opportunity to engage with the Examination in the way outlined in the Government guidance. Additionally, and as noted in multiple written submissions (most recently Section 1.2.5 of [REP4-134]), FBC considers that it has not been possible for some information to appropriately impact the proposals.

FBC will comment on this further at Deadline 7, with the benefit of being able to see what has been submitted at Deadline 6.

APPENDIX 1

1 Table 1-1 Opportunities for Alternative Provision of Recreation Facilities

This document has been prepared in response to potential alternative sites within Fylde for accommodating football provision suitable for St Annes Football Club.

The table below provides responses to the potential suitability for senior or junior football activity for the suggested sites as put forward by the Applicants.

Following review, no substantive changes to the content of the site assessment have been identified. However, information is added to clarify the intended meaning of references to Multi-Use Games Areas, to ensure future consultation and local context are fully considered.

Site	Approx. Area (ha)	Current Use	Potential Provision	Suitability for St Annes FC
Ramsgate Road Park	2.4	Open space, swings	Potential for training pitches	<i>Possible only for junior or training use only – 2.4 ha could fit one small pitch, limited space for parking, changing, and other club facilities. Surrounded by housing, so lighting and evening use would likely be constrained.</i>
Frobisher Drive Park & Playground	0.8	Playground and open space	Limited potential	<i>Unsuitable – too small (0.8 ha) for a regulation pitch or meaningful football activity. Would be better kept as community play space.</i>
King George's Field	1.0	Playground and open space	Limited potential	<i>Unsuitable – only 1 ha and typically subject to community recreation covenants; would not accommodate a full-size pitch or facilities.</i>

Hope Street Park & Community Pavilion	2.0	Bowling greens, playground, mini-football pitch	Opportunity to upgrade facilities	<i>Possible for training/youth use – 2 ha site could host one 9 v 9 or training pitch with pavilion improvement. Multi-use site so conflicts possible; limited parking.</i>
Fylde Scout Activity Centre	0.3	Open space	Small training pitch	<i>Unsuitable – only 0.3 ha; could accommodate a very small training area at best. Existing Scout use would also restrict access.</i>

Site	Area (ha)	Owner	Existing Facilities	Travel Time	Current Notes	Suitability for St Annes FC
Heyhouses Playing Field	2.8	FBC	Open space, playground	On foot: 30 mins By vehicle: 4 mins	Opportunity for new training pitches, and play facilities.	Limited suitability – Good size and potential for training pitches but currently geared toward play areas; would require significant redevelopment for senior football.
Landsdowne Road Park	0.7	FBC	Playground, open space	On foot: 48 mins By vehicle: 6 mins	Opportunity for new junior/mini pitches, MUGA.	Unsuitable for senior FC – Small area, mainly for junior/mini pitches and play; too limited for adult football.

Mayfield Primary School	0.9	FBC	Mini football pitches	On foot: 18 mins By vehicle: 3 mins	Potential for use as junior training pitches.	Unsuitable – Only mini pitches, suitable for junior training but not senior matches.
Heyhouses Endowed C of E Primary School	0.6	FBC	Mini football pitches	On foot: 18 mins By vehicle: 3 mins	Potential for junior training pitches and matches.	Unsuitable – Too small and only mini football facilities; junior use only.
Clifton Primary School	0.4	FBC	Mini football pitches	On foot: 35 mins By vehicle: 5 mins	Potential for use as junior training pitches.	Unsuitable – Small size and limited to junior football; not feasible for senior team.
Lytham St. Annes High School	5.3	FBC	Full size & mini football pitches, artificial pitches	On foot: 46 mins By vehicle: 6 mins	Limited – already used as training/match facility.	Potential but limited – Full-size pitches exist, but site is already in use; availability may be constrained.
Fylde Rugby Football Club	2.8	FBC	Rugby & football pitches, artificial pitch	On foot: 51 mins By vehicle: 7 mins	Limited – already used as training/match facility.	Potential but limited – Existing pitches suitable for senior football, but sharing with rugby may complicate scheduling.
Blackpool Common Edge Sports Village	12.0	BBC	Full size & 6-aside football pitches	On foot: 32 mins By vehicle: 4 mins	Potential for use as training/match pitches and	Highly suitable – Large site with multiple pitches; ideal

					inclusion of MUGA.	for senior football and training; access reasonable by car.
St Nicholas C of E Primary School	0.3	BBC	Mini football pitch	On foot: 39 mins By vehicle: 5 mins	Potential for junior training pitch.	Unsuitable – Very small site; only appropriate for junior football.
Our Lady of the Assumption Catholic Primary School	1.0	BBC	Grass sports field	On foot: 47 mins By vehicle: 6 mins	Potential for junior training pitch.	Unsuitable – Limited area; only feasible for junior training.

It is noted that references to the inclusion of Multi-Use Games Areas (MUGAs) within this assessment should not be interpreted as fixed proposals, and MUGAs are generally unsuitable for competitive structured team sport to meet County Football Association standards.

Any future consideration of MUGA provision would require consultation with local interest groups, including '*Friends of Parks*' groups and other community user organizations.

It also must be noted that MUGAs are not acceptable alternatives for football provision and provide neither league approved sizing nor adequate playing surfaces/area.

Proposals for upgrading facilities at Blackpool Road North Playing Fields would be welcomed and supported by the local community, FBC and the football club.

Conclusion

This document provides information and transparency within the examination process. It aims to give a balanced overview of current options and considerations regarding potential football provision for St Annes Football Club.

No formal recommendation is made at this stage, and any future proposal would be subject to further consultation, planning and financial appraisals.