

## Morgan & Morecombe Wind Farm

### Consultation on On-Shore Assets and Impact on Freckleton

#### 1. Summary

Freckleton Parish Council and the local community has no inherent objections to the principles of establishment of Off-Shore Wind Farms as a means of meeting the Energy Targets from renewable sources. However, there are deep concerns regarding the Proposal that is currently being placed before us because of the potentially disastrous implications for the future of The Fylde as a farming community and as a place of amenity for the residents and the many visitors who enjoy the facilities and environment that the Fylde currently affords.

This note attempts to summarise these views and provides the overall conclusion that we must object to the proposals as presented as the impact is too high when compared to both the Local and National Benefit to be accrued.

The note provides details of the logic behind this conclusion, especially relating to the programme consultation process, maturity of definition and likely cost issues arising.

#### 2. Introduction

Prior to the Statutory Consultation phase, the initial engagement was poorly thought through and badly executed. The current Statutory Consultation has again been accompanied by errors in distribution of key documents, despite pleas for addresses to be corrected.

The interest from the Community is intense, despite this. However, the consultation events have been overcrowded, with entry being closed for periods, supported by contract staff who were frequently unable to provide adequate explanation and display material that could be difficult to interpret, even with staff assistance. Issues raised seem to have been poorly recorded as brief notes, failing to capture with sufficient clarity to permit adequate interpretation after these engagement events.

The Parish Council will try to ensure that all who are affected by this development make their input, as requested.

#### 3. Agriculture in The Fylde – A Background

Before looking at the issues with this project further, it is worth examining the nature of rural Fylde and its agricultural background. Historically, many farms are small with little of the conglomeration that has happened elsewhere in the UK. Most farms have been family run, self-sufficient, capable of supporting the farm and the family living there. They are characterised by a rich, marl type soil, which is good for grassland for dairy and sheep and winter fodder.

Many farms have subsequently been divided between heirs, resulting in the fields being scattered, sometimes over a considerable area.

There have been changes of ownership and acquisition which has sometimes brought land together, but not in the original packages, further complicating the land distribution. This can be seen clearly from the air,

where the Fylde appears as a patchwork of fields, which in major part adds to the overall character of the area.

The track of the proposed development crosses many such farms, where the landowner may not live immediately adjacent to the proposed track of development. There is evidence that not all the affected landowners have been properly and fully consulted about the proposed development across their properties.

#### 4. Scope of the Proposed Project and Selection of Possible Alternative Routes

From the Consultation Events, the project has had quite a narrow scope imposed upon it, such that investigation of possible alternative routes was not able to be discussed properly or any relevant questions answered.

For example, when questioned about the possibility of coming ashore at Heysham, where two nuclear plants are currently active, it was stated that this was out of scope and the capacity there was inadequate to deal with the output from the MMWF.

This should be questioned, as Heysham 1 and 2 plants are capable of 6GW power generation, MMWF is planned at 4.5MW, but more significantly, Heysham is planned to commence decommissioning work in 2025/6 for Heysham 1, with Heysham 2 following in 2028. The build completion for the current project is currently planned for 2029, which would imply that the on-shore capacity at Heysham should be easily capable of taking the load into the National Grid – presumably at far lower cost to the public purse, even allowing for any infrastructure refurbishment.

Equally, routing along the River Ribble to Penwortham has been dismissed rather too easily, despite the existence of other cables in the riverbed already.

#### 5. Consultation Process

The non-statutory consultations prior to the current phase were inadequate. Generic postcards were sent to many but not all residents. These were included with junk mail flyers, so many may have been discarded resulting in many people being unaware.

Worse, key landowners, whose properties and/or livelihoods are and will be adversely affected, were not uniformly covered by more detail briefs. Addresses were mixed up and the relevant people not identified, despite being provided with correct information at the outset. Some improvement has taken place, but only after threat of action under Data Protection Regulations. Access requests for survey work have been patchy, as has the process of providing the agreed payments for these access visits.

The briefing packs that have been produced were inadequate, in terms of the necessary detail to permit informed reactions or counter proposals. This also applies to the consultation events, where the detail was not provided to the forum as information on the presentation material, or even in response to detailed questions from the affected landowners to the project representatives.

Some of the proposed buildings required as sub-stations appear gargantuan in scale, perhaps because the technologies to be applied have yet to be chosen, but this would also imply that the project is not adequately mature to be progressing to the formal consultation stage prior to submission to the Secretary of State.

The comment was made, half in jest, that the process had the feel of HS2 about it, with all the effort being spent on publicity rather than on maturing the technology and design.

## 6. Provided Information – Inadequacy

As noted, the information provided was lacking in detail such that the landowners affected by the development could not fully appreciate the implications on their own businesses. The team responsible appeared to have little knowledge as to where the landowners are located, in relation to the proposed works on their properties, as reflected in the mess made of establishing the contacts and their addresses properly.

Experience garnered from those exposed to other developments of a similar nature highlights some of the dangers that have yet to be considered. For example, the proposed underground cable conduits are likely to require access manholes or inspection chambers along the route. In other examples, these have resulted in raised mounds as the disturbed land gradually sinks. This can result in damage to very expensive farm machinery that may be engaged in crop cutting, whether for silage or for arable crops.

No definition of such obstacles has been provided as it is considered “premature at this stage”. The implication is that the overall design of the whole system has not yet achieved an adequate level of maturity to enable meaningful assessment of associated risks and costs of installation, ownership, and finally retirement of the system.

Yet in other areas, the progress seems bogged down in unnecessary details, for examples challenges relating to ownership of small parcels of land identified on maps, which are gateways to the fields and properties where the actual gate may be set back from a road to allow a vehicle to stop and gain access to the field in question without blocking the roadway!

This appears to be being used to obfuscate the real issues where decent design information is sadly lacking.

A further example is the lack of forethought that relates to the predicted changes in sea levels that is the driver for the need for green energy. The Fylde and Ribble estuary are naturally low lying with the EA having provided forecasts of the changes in flood risk in the recent past. This does not appear to have been considered, to date.

## 7. Observations on Funding, Compensation and Payment Issues

They were unaware that the proposed sectioning of fields would render the remainder of many fields as unusable, as all access had been destroyed and the associated hedge boundaries destroyed. As an example, where the proposed development tracks across the road from Freckleton to Kirkham, at Hall Cross, many fields are being cut diagonally, leaving small triangular sections that are inaccessible and impossible to farm for anything that will be useful, but these areas remain outside of the proposed compensation schemes.

On the eastern side of Kirkham Road, the possible site of one of the sub-stations, there is a dairy farm which has just received a UK silver award for best Grassland Farm and the proposed development will effectively destroy the lifetime of work that has gone into this, with that farm being divided into two parts and with significant permanent loss of land. How can anyone be compensated for this sort of loss, even on a temporary basis?

The assumption that farms that rely on grazing can acquire their winter feed from outside is fundamentally flawed. Most of these farms grow their grass to provide their winter feed, so anything that takes these fields out of production automatically upsets the local ecosystem that supports the farm. There is an ecosystem here that has been in operation for years that produces the farm products in an eminently sustainable and self-sufficient way. This will be destroyed.

Even after restoration, those fields with underground cables will fail to be as productive as they once were. It is still possible to see the impact of developments made by the Romans in the crop structures of the Fylde. This will be far more impactful.

The consequence is that proposers appear to have grossly underestimated the costs of compensation that would associate with the land acquisition and the ability to return much of the land to productive use. Currently, they are not considering compensation for loss of earnings for anyone affected by their development from their pot of funds, at least.

## 8. Environmental Impact – Assessment and Proposals

Great emphasis was being placed on the plans to minimise the impact on the environment by encouraging development of biodiversity off the route of the development. However, no proper account was made for the existing activities being undertaken on the sensitive sites, by farm owners and the owners of the Freckleton and Newton / Clifton marshes, where the efforts already being made are producing a substantial benefit to the local wildlife and protected species to be found in these areas of the Fylde.

It did appear as if anything already established here was going to be claimed by the project as an offset to the environmental disaster that would be created by the development of the whole tract of land across the whole of the Fylde, with all the consequence of disturbance that ensues to farms, marshes, drains and watercourses – some of which are protected rivers that feed the Ribble and Alt RAMSAR sites.

Nothing seemed to indicate a benefit that would be demonstrated, other than the “green” source of electricity. No firm ideas were presented, despite one of the conditions being that they spend a percentage of their funds on new measures to enhance biodiversity. The only suggestion to date was the acquisition of bird boxes and this for an area that is primarily populated by ground nesting birds.

A lot of boxes would be needed to make up the implied funding levels talked about!

No information has been provided regarding the possible acoustic issues that can surround substation equipment, which may produce a low frequency 50hz background hum which can be extremely annoying. This specific concern relates to those substations close to the residential areas, especially those close to Kirkham Rd.

There have been concerns raised regarding possible electro-magnetic issues associated with the high-power transmissions and the possible impact of this and the need for screening that might result.

## 9. Conclusions

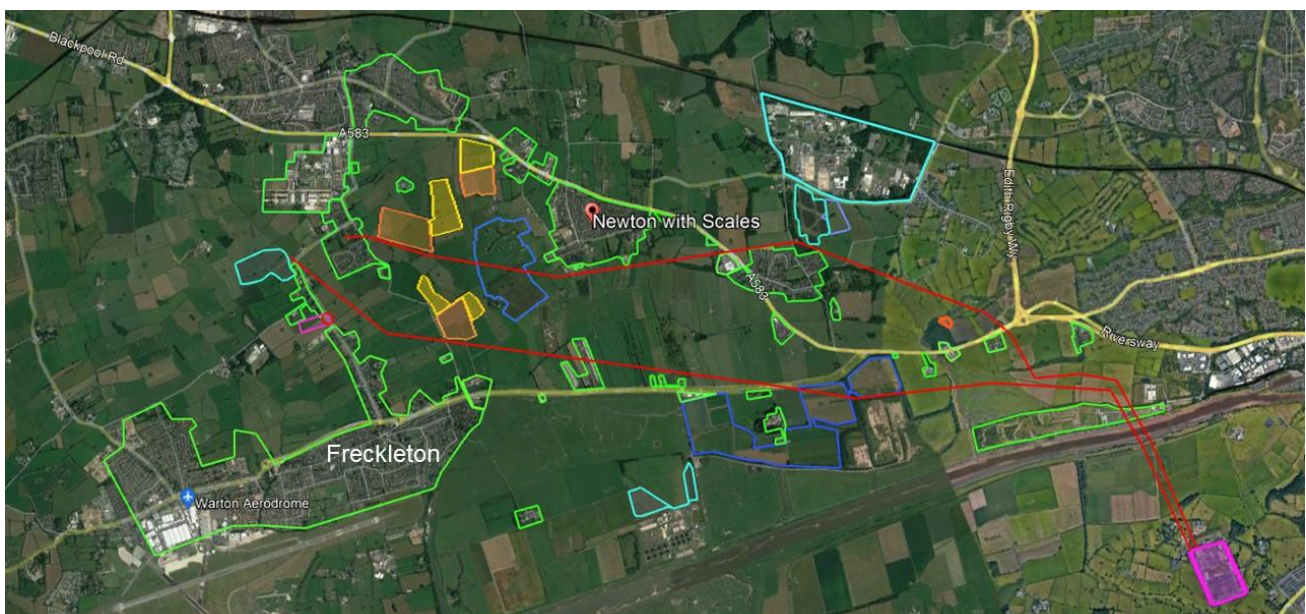
The overall conclusion that the Parish Council has reached is that, with the evidence and status presented, we must object to the proposals. The following reasons support this objection:

- 1) The consultation process has been flawed in its execution.
- 2) Insufficient information has been provided to enable a proper assessment of the impact of the design on the total environment of the Fylde.
- 3) Consequently, the proposed plan does not have a level of maturity commensurate with presentation for approval.

- 4) The impact on individual landowners has not been determined, relating to both the development and implementation phase and the subsequent in-service life cycle of the system.
- 5) Costs associated with levels of compensation appear to have been underestimated.
- 6) The impression has been created that the programme is underfunded and that any additional costs would have to be sought by access to the public purse, a similar situation to that occurring with the HS2 project.
- 7) The impact of the loss of amenity, for both residents and visitors, is considered too high a price to pay for the proposed development, when all possible alternatives have been summarily dismissed for reasons that are unclear.

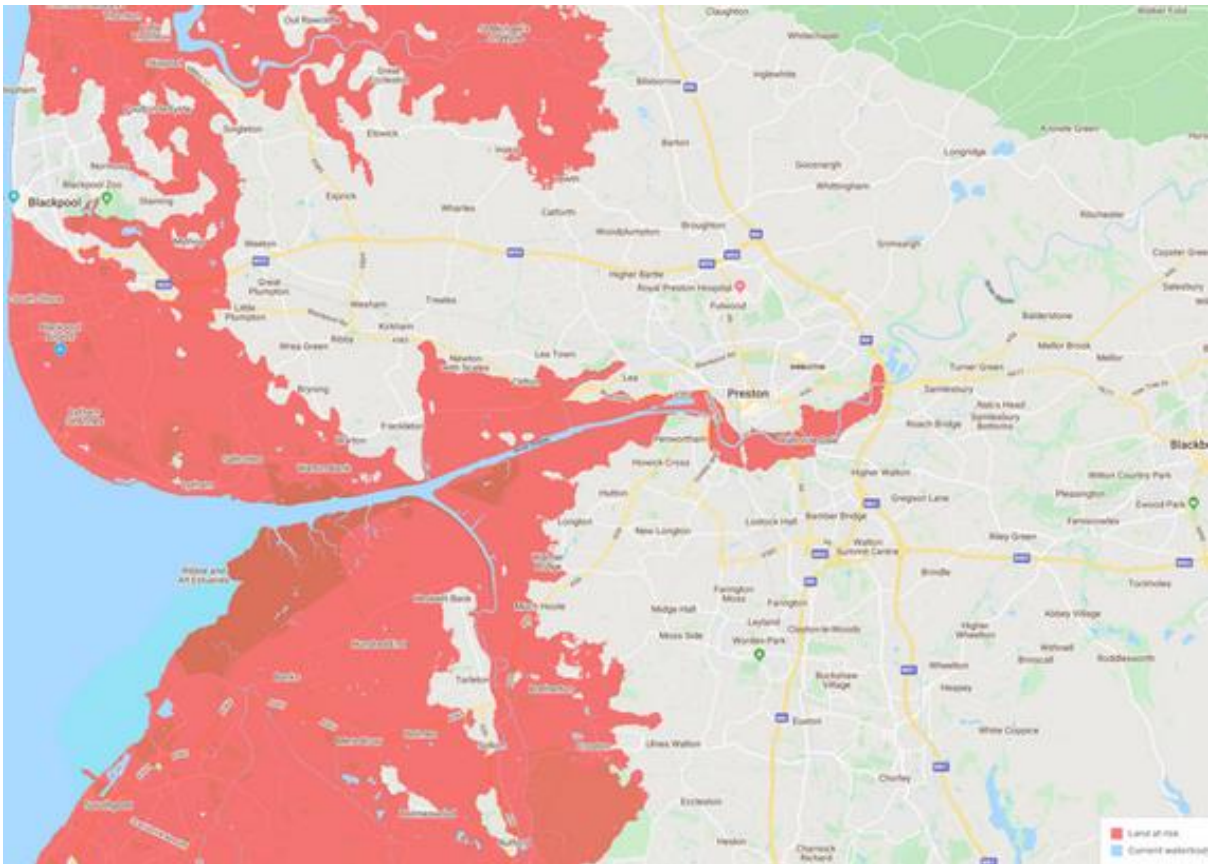
## 10. Attachments

- 1) Map of Freckleton & Newton with Clifton highlighting the key elements of the proposal in relation to existing developments and population areas



Red lines indicate existing overhead Pylon routes, Pale blue are existing solar farms and a nuclear licensed site, the dark blue indicates proposed solar farms and expansions to existing solar, proposed substations are in orange with construction compounds in yellow. Residential areas, commercial properties and farms are outlined in green. Penwortham substation is pink.

## 2) Environment Agency Prediction of Flood Risk Forecast for 2050 for the Ribble Estuary



Areas marked in red are predicted as the Class 3 Flood Risk zones.