


MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 3.2.2 to Response to RR - Blackpool Borough Council (RR-248)



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1 Applicants' response to Relevant Representations

1.1 Introduction

1.1.1.1 Following closure of the relevant representation period under Section 56 of the Planning Act 2008 for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to as 'the Transmission Assets') (the Applicants), the Applicants have taken the opportunity to review each of the Relevant Representations (RRs) received from stakeholders who registered as Interested Parties in the examination.

1.1.1.2 Table 2.1 provides an overview of the Applicants' response to the Relevant Representation of Blackpool Borough Council (248).

2 Responses to Relevant Representations

2.1 Blackpool Borough Council

Table 2.1: RR-0248– Blackpool Borough Council

Reference	Relevant Representation Comment	Applicants' response
RR-0248 248.1	We submit this Relevant Representation on behalf of Blackpool Borough Council, in its capacity as a Host and Neighbouring Authority (the "Council") for the proposed development consent order made by Morgan Offshore Wind Limited ("Morgan OWL") and Morecambe Offshore Windfarm Ltd ("Morecambe OWL"), (together, the "Applicants").	The Applicants note the Relevant Representation from Blackpool Borough Council (the Council) as a host and authority, as well as the concerns raised in the relevant representation (please refer to RR-248.10 below).
RR-0248 248.2	The Applicants seek the grant of a development consent to construct, operate and maintain, and decommission two electrically separate transmission systems (the "Transmission Assets"), which are proposed to connect to the Morgan and the Morecambe Offshore Wind Project: Generation Assets ("Application").	
RR-0248 248.3	The Application Form states that the onshore elements of the Application are located within the local authority areas of Fylde Council, Blackpool Council, South Ribble Borough Council, Preston City Council and Lancashire County Council.	
RR-0248 248.4	The Council provides initial comment on matters which relate to the content and scope of the Application in respect of the Council's duties towards its residents, commercial businesses and the environment. Whilst the	

Reference	Relevant Representation Comment	Applicants' response
	Council recognises and supports the principle of renewable energy projects and resultant long term advantages which they invariably bring to the wider community, the Council has concerns in respect of the current dDCO drafting, lack of information (in particular the EIA, CTMP & TMP) and consequential lack of clarity in the current Application, and supporting documents. Potential impacts identified in this Representation are an indication by the Council at this initial stage of proceedings; detailed comments will emerge through the Council's Local Impact Report and involvement in the Examination process.	
RR-0248 248.5	The Application does not fully assess alternative cable routes, or the potential cumulative effects when considered alongside other projects within the vicinity. Such an assessment should be undertaken by the Applicants as soon as possible prior to Examination so that any resulting amendments and requirements for additional mitigation may be included into the Application during the Examination.	<p>The Applicants have undertaken a rigorous and robust route planning and site selection process as presented in Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026). Following the identification of the Point of Interconnection (Penwortham) for both Morgan and Morecambe, the Applicants followed the sequential process set out in section 4.7.1 onwards to identify suitable locations for landfall and the cable corridors and onshore substations. The site selection chapter explains in detail the numerous options considered and the reasons for the final chosen locations. The alternatives were also subject to non-statutory and statutory consultations and feedback received was taken into consideration in the finalising the route for the application.</p> <p>Diagram 5.5 within the Environmental assessment methodology chapter (APP-034) explains the Applicants' approach to assessing potential cumulative impacts in line with the Planning Inspectorates Advice Note - "Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment". All proposed development with adequate information available in the public domain has been assessed throughout the</p>

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		<p>Environmental Statement. As such, it is not possible to assess the cumulative impacts of proposals at the early stages of development where no information is available in the public domain as there is a lack of adequate data to assess.</p> <p>Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039) provides details of the methodology for identification of cumulative projects for consideration and have identified where cumulative impacts have the potential to give rise to likely significant effects for specific impact assessments topic areas within the Cumulative Effects Assessment (CEA). It also provides the CEA long list (both onshore and offshore) and cumulative effects screening matrix.</p>
RR-0248 248.6	<p>Highways considerations are currently not fully quantified and additional resources are required to enable the Council to work with the Applicants on potential mitigations. Works should utilise and not over-ride the New Roads and Street Works Act 1991, which includes provisions to ensure that minimal interference is in accordance with checks and balances in the public interest. Such public interest factors include consideration of queuing, diverting or rat-running traffic during construction and operation will decrease air quality and disrupt commercial, air traffic and residential users. Any proposed movement of abnormal loads, closures and diversionary routes should be agreed with all the relevant host and neighbouring authorities during the Examination process and set out clearly in the CTMP.</p>	<p>The Applicants fully recognise the potential resourcing constraints that Local Planning Authorities are under. The Applicants have offered a Planning Performance Agreement (PPA) to facilitate the provision of dedicated resources and associated cost recovery to Blackpool Borough Council. The Applicants have now received an email from Blackpool Borough Council requesting the development of a PPA on 4th March 2025 which the Applicants have agreed to progress.</p> <p>Blackpool Borough Council were also invited to the Traffic and Transport Expert Working Group as a part of the Evidence Plan process during the development phase and in the lead up to the submission of the application.</p> <p>Highway Considerations:</p> <p>The Applicants refer the Council to ES Volume 3, Chapter 7: Traffic and Transport (APP-108) which provides a detailed assessment of the impacts of the Transmission Assets upon traffic and transport receptors, in compliance with EN-1 and other relevant transport policy and guidance. To inform the assessment, the Applicants have undertaken a comprehensive</p>

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		<p>data collection exercise including capture of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within the Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links has been collected covering over 155km of highway network.</p> <p>The assessment has considered the effects of the Transmission Assets upon the impacts of driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads and concludes that residual effects would not be significant.</p> <p><i>New Road and Street Works Act 1991:</i></p> <p>Construction of the Transmission Assets will require the use of temporary traffic management for short periods (e.g. the installation and removal of accesses). However, the draft Development Consent Order (DCO) (AS-004) does not override the key provisions of the New Roads and Street Works Act 1991, as amended by the Traffic Management Act 2004, and all highway works would be required to be booked through Street Manager. The booking of any works through Street Manager (as mandated, and adopted by the Council) will ensure that all highway works are progressed in accordance with the relevant highway authorities' requirements and restrictions (e.g. ensuring road works are scheduled outside of defined traffic sensitive periods) and that the relevant highway authorities can continue to exercise their duties to ensure the safe and efficient movement of traffic.</p> <p><i>Road Closures:</i></p> <p>To minimise disruption, trenchless installation techniques, such as Horizontal Directional Drilling (HDD) will be used at all A, B and Classified roads (with the exception of Leach Lane) and railways crossed by the Transmission Assets (see CoT02, Volume 1, Annex 5.3: Commitments Register (AS-030). This commitment to the use of trenchless techniques is secured via</p>

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		<p>Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (AS-004). The approach to managing highway crossings is outlined in Section 1.8 of the outline Construction Traffic Management Plan (OCTMP) (APP-211). The detailed CTMP(s) will be produced in accordance with the oCTMP in consultation with, and for approval by, the relevant highway authority, as is secured by Requirement 9 in Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>Abnormal Loads:</p> <p>Section 1.4 of the outline Construction Traffic Management Plan (OCTMP) (APP-211) includes a commitment to ensuring that the timing of abnormal indivisible loads (AIL) deliveries is discussed and agreed with the relevant highways authority to minimise delays for other road users and to minimise risk to highway users. The final timing and routeing of abnormal load movements will be discussed in further detail and agreed with the relevant highway authorities to inform the detailed CTMP(a). The requirement to produce detailed CTMP(s) in accordance with the OCTMP and agree these with the relevant highway authority, is secured by Requirement 9 of Schedules 2A and 2B of the draft DCO (AS-004).</p>
RR-0248 248.7	Insufficient level of detail has been submitted detailing the cabling routes, and necessity of the various rights, particularly through sensitive protected land such as the SSSI, St Annes beach (area known as Starr Gate), the airport buffer area and the Enterprise Zone. Areas of land exist for public use and the Application does not offer any certainty as to the extent, reasons and duration of the interference, both during and after construction. The Application reserves maximum flexibility to the Promoter including what appear as access routes into and out of the airport, residential areas, SSSI and public open	<p>The detail around the land rights sought in each plot can be found in the Book of Reference (AS-11), Schedules 7A, 7B, 8A and 8B of the draft DCO (AS-004), and shown in the Land Plan – Onshore (AS-019). The proposed works are set out in Schedule 1 (Authorised Project) of the draft DCO (AS-004), and shown in the Works Plans - Onshore and Intertidal Part 1 of 2 (AS-016) and Works Plans - Onshore and Intertidal Part 2 of 2 (AS-017). The Statement of Reasons (APP-013) states that the powers applied for within the draft DCO (AS-004) “<i>will allow the necessary works to take place for the development and operation of the Transmission Assets. They have been drafted to be comprehensive, whilst allowing flexibility within the process to ensure as low an impact on those affected as possible.</i>” Should</p>

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	<p>space. Section 139(3) of the Planning Act 2008 prohibits the suspension, extinguishment or interference with registered rights of common except in accordance with s131 or s132.</p>	<p>the Council require further justification, the Applicants welcome discussion with the Council as to this necessary flexibility.</p> <p>The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to install the offshore export cables under Lytham St Annes SSSI and the St Annes Old Links Golf Course via trenchless installation technique to mitigate potential effects associated with the construction of the landfall. This provided in the outline Code of Construction Practice (APP-193) which is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048) provides detail regarding public access at Lytham St Annes Beach. For activities along the length of the beach, from the direct pipe exit pits to Mean Low Water Springs (such as for direct pipe installation and offshore cable pull-in and burial), a section of the beach would need to be temporarily closed off to public access, for short durations, while certain activities are taking place. In such cases, the Applicants will implement managed crossings either to the seaward or landward side to allow users to maintain access across the beach.</p> <p>Further and full information on management measures for how such closures at the beach would be undertaken will be agreed with the relevant planning authority as part of the detailed PRoW Management Plan(s) secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>The Access to Works Plan (APP-157) and outline Highway Access Management Plan (APP-213) provide additional detail on the construction and operational accesses proposed for the Transmission Assets, including the access routes into and out of Blackpool Airport. Access routes into and out of the airport are subject to discussions with Blackpool Airport Operations Limited (RR-245) and Blackpool Airport Properties Ltd. (RR-246) and the Applicants are in ongoing dialogue with both parties. The</p>

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		<p>Applicants have provided detail on those discussions in the Applicants' response to Rule 9 letter (AS-067).</p> <p>The programme and construction scenarios that have been assessed are set out within paragraph 3.9 of ES Volume 1, Chapter 3: Project Description (AS-024). The Applicants have also provided an additional technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios (AS-070) outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations.</p> <p>In accordance with guidance on Environmental Impact Assessment (see Volume 1, Chapter 5: Environmental Assessment Methodology of the Environmental Statement (APP-034)), the Applicants have assessed the maximum design scenario to determine the extent of land required. This approach ensures that only the land necessary for the development is acquired, and where land is ultimately not required, compulsory acquisition powers will not be exercised.</p> <p>The design envelope has been carefully considered in order to minimise land requirements, including any permanent land take, as much as possible, whilst providing the Applicants with the necessary degree of confidence in the land take required for the infrastructure. The flexibility that has been built into the design envelope is required to ensure that the Transmission Assets can be delivered. If that flexibility were to be reduced at this stage, before the detailed design stage has been completed, it could compromise the ability to implement the Transmission Assets.</p> <p>For linear infrastructure projects of this scale, it is standard practice to seek compulsory acquisition powers in respect of the full extent of the Order limits, for example, to account for varying ground conditions, obstacles or constraints, and subject to the detailed design. Post consent, once the technical constraints and ground conditions are better understood, the</p>

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		<p>detailed design can be finalised and the Applicants will confirm final land take.</p> <p>The Applicants remain committed to minimising land take and ensuring that the final route layout is appropriately refined post-consent.</p>
RR-0248 248.8	The available information on alternative options assessed by the Applicants, including with respect to impacts and environmental effects (particularly avoidance of the SSSI) are both inconsistent and incomplete.	Please see the Applicants' response to RR-248.5 above.
RR-0248 248.9	<p>Finally, it is considered that there is a lack of sufficient assessment of national and local policy which include the following (a full policy appraisal will form part of the Local Impact Report (LIR) and later representations):</p> <p>a) Current, local development plan documents for Blackpool comprise; the Blackpool Local Plan Part 1: Core Strategy (2012-2027) (adopted Jan 2016) and the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (adopted Feb 2023); and</p> <p>b) Airport and enterprise zone are policies T3 (Blackpool Airport) and EC4 (Blackpool Airport Enterprise Zone) of the Fylde Local Plan and Policy DM8 (Blackpool Airport Enterprise Zone) of the Blackpool Local Plan Part 2 respectively. Of note, local planning policy states that land designated as green belt within the airport, will be safeguarded from non-airport related development unless justified by very special circumstances; and</p> <p>c) National policies on green belt set out within the National Planning Policy Framework (updated December 2024) are to be applied when assessing proposed</p>	<p><u>Local plan(s)</u></p> <p>The Applicants consider that following the publication of the Rule 6 letter (PD-006) by the Examining Authority, that the section on 'Government legislation and policy' implies that the primary policy framework for decision-making on the Transmission Assets is set out in NPS EN-1 as the Transmission Assets is subject to a section 35 direction under the Planning Act 2008 (the 2008 Act) (APP-229). National and local planning policies have been fully considered in the Planning Statement (APP-233). This is in accordance with NPPF1 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 (the Blackpool Local Plan Part 1).</p> <p>Section 3 of the Planning Statement (APP-233) details the national and local planning policies relevant to the Transmission Assets while section 5 provides an overview of compliance with these policies.</p> <p>The National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236) detail how the Transmission Assets aligns with policy requirements, including those related to the Green Belt and Very Special Circumstances.</p> <p>The Local Planning Policy Tracker in particular details how the Applicants have considered and assessed the potential impacts of Transmission</p>

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	<p>development in such locations. Additionally, national and local planning policy support the protection of nature conservation sites.</p>	<p>Assets against both the Blackpool Local Plan Part 1: Core Strategy 2012-2027 and the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies (APP-236).</p> <p>Given the limited extent of the Order Limits within the Council's boundary, only the relevant policies affecting that area have been considered in detail.</p> <p><u>Airport and enterprise zone</u></p> <p>While Policy EC4 (Blackpool Airport Enterprise Zone) of the Fylde Local Plan to 2032 (incorporating Partial Review) (the Fylde Local Plan) is not explicitly listed in the tracker, compliance with Policy DM8 of the Blackpool Local Plan Part 2: Site allocations and development management policies, which covers the same area, has been assessed. The design of the Transmission Assets has taken into account key existing land uses, including Blackpool Airport and the Enterprise Zone. As detailed in Table 11.11 of ES Volume 3, Chapter 11: Aviation and Radar (APP-130), with mitigation measures (secured in consultation with Blackpool Airport), there will be no significant effects arising from the Transmission Assets during the construction, operation and maintenance phases. Similarly, ES Volume 4, Chapter 2: Socio-economics (APP-141) and ES Volume 3, Chapter 6: Land Use and Recreation (APP-104) confirm that there will be no significant effects on these areas arising from the Transmission Assets during the construction, operation and maintenance phases. The Applicants also considered and assessed compliance with Policy T3 of the Fylde Local Plan, which provides that "land designated as Green Belt within the airport will be safeguarded from non-airport related development and the continuing operation and viability of the airport as a sub-regional facility will be supported, unless there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt". In assessing the Transmission Assets against this policy, a</p>

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		<p>very special circumstances and 'on balance' planning assessment was carried out and is provided within Section 6 of the Planning Statement (APP-233), which demonstrates that very special circumstances exist to allow the development in the Green Belt. The assessment concluded that the proposed landfall and cabling at this location would not harm the viability of the airport, as demonstrated in Volume 3, Chapter 11: Aviation and radar (document reference F3.11). It is therefore considered that the Transmission Assets complies with this policy. As such, it is considered the same conclusion can be drawn in regard to Policy EC4 of the Fylde Local Plan.</p> <p><u>National Policies on greenbelt</u></p> <p><u>Assessment undertaken</u></p> <p>The Applicants confirm that they have robustly assessed the proposed development against national and local planning policy, including the requirement to demonstrate very special circumstances for development in the Green Belt. The Applicants have not given preference to development in designated Green Belt land. Please see further detail set out below.</p> <p>As detailed in sections 5.24, 6.2 and 6.4 of the Planning Statement (APP-233), the Transmission Assets meet the policy tests set out in NPS EN-1, NPS EN-3 the NPPF and local planning policy (including the Fylde Local Development Plan (FDLP)).</p> <p><u>Very Special Circumstances</u></p> <p>The test for very special circumstances has been met.</p> <p><u>Starting position under EN-1</u></p> <p>The Applicants assert that the Transmission Assets benefit from the presumptions at paragraphs 4.2.16 and 4.2.17 of EN-1 which state that critical national priority (CNP) infrastructure is assumed, as a starting point,</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>to have met any tests which are set out within the NPSs or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances, provided that the Applicants demonstrate that the mitigation hierarchy requirements in paragraph 3.3.63 of EN-1 have been met, as set out in section 3.4.4.15 of the Planning Statement (APP-233). This includes the requirements for very special circumstances to allow for development in the Green Belt, in accordance with paragraph 5.11.20 of NPS EN-1, paragraphs.8.57 – 2.8.58 of NPS EN-3, Policy CS6 (Green Infrastructure) of the Blackpool Local Plan Part 1 and Strategic Policy GD2 (Green Belt) of the Fylde Local Plan, as well as other related local planning policies, considered in further detail in the Local Planning Policy Tracker (APP-236). This means that matters of openness or justification regarding the impact on the purposes of land in the Green Belt are not required, as the need for CNP infrastructure outweighs the harm to the Green Belt by reason of inappropriateness or any other harm, as demonstrated in section 5.24 of the Planning Statement (APP-233).</p> <p>As an integral part of a nationally significant low carbon infrastructure project, the Transmission Assets are considered to be CNP infrastructure, as set out in paragraph 4.2.4 of NPS EN-1 and the sections 5.24, 6.2 and 6.4 of the Planning Statement (APP-233). Paragraph 4.2.5 of NPS EN-1 confirms that energy transmission projects directed to be considered under the Planning Act 2008 under a section 35 direction (as is the case for the Transmission Assets) constitute CNP infrastructure.</p> <p><u>Impact of the Transmission Assets on the Green Belt</u></p> <p>The Applicants have assessed the implications of the Transmission Assets on the Green Belt in sections 5.24.1.4-5.24.1.9 of the Planning Statement (APP-233). The offshore (at the landfall) and onshore export cable corridor consists of underground cables, which constitute engineering operations under paragraph 154 of the NPPF and do not conflict with the purposes of the Green Belt. The above ground works are temporary (i.e. with the export</p>

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		<p>cables being buried), and the land will be restored post-installation. As such the spatial and visual impacts of the works, as well as the duration of the development and its remediability mean that the export cable corridor both preserves the openness of the Green Belt and does not conflict with its purposes.</p> <p><u>Compliance with 'very special circumstances' test</u></p> <p>The Applicants have demonstrated in section 6 of the Planning Statement (APP-233) that the significant benefits of the Transmission Assets as a result of energy transmission from renewable sources mean that even if the Transmission Assets was not considered to be CNP, very special circumstances do indeed exist to outweigh the harm to Green Belt by reason of inappropriateness or any other harm.</p> <p>In addition, as detailed at RR-1261.8 above, the Applicants have sought to avoid siting the Transmission Assets (where practicable) within the Green Belt, by undertaking a robust site selection and consideration of alternatives assessment in ES Volume 1, Chapter 4: Site selection and consideration of alternatives (AS-026) and Tables 4.7 and 4.10 of ES Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure.</p> <p>Furthermore, in section 6.4 of the Planning Statement (APP-233), as well as throughout the ES and associated mitigation strategies (APP-015-APP169 and AS-024-AS-057) the Applicants have demonstrated that they have assessed and ensured that any residual effects are minimised.</p> <p>In any event, the Transmission Assets complies with NPS EN-1, NPPF 2024 and local planning policy (including the Blackpool Local Plan), as demonstrated in the Planning Statement (APP-233), the National Policy Statement Tracker (APP-231), the National Planning Policy Framework Tracker (APP-234) and the Local Planning Policy Tracker (APP-236).</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The Transmission Assets therefore meet the policy tests for very special circumstances, and there is no reason why the development should not proceed in Green Belt land.</p> <p><u>Conservation Sites</u></p> <p>Regarding the protection of nature conservation sites, section 5.13 of the Planning Statement provides an assessment, with compliance with the relevant policies demonstrated within the NPS Tracker (APP-214), NPPF Tracker (APP-234) and Local Planning Policy Tracker (APP-236). ES Volume 3, Chapter 3: Onshore ecology and nature conservation (APP-075) and sections 5.13.1.11 and 5.13.1.12 of the Planning Statement provide more detail on how the Transmission Assets comply with the relevant national and local policies.</p>
RR-0248 248.10	In light of the above, the Council requests to be registered as a Host and Neighbouring Authority to the examination. Further to this representation, the Council will be providing a LIR and, if necessary, written and oral representations at the examination.	As confirmed in the Consultation Report (APP-170), at the time of Section 42 Consultation, the Council was identified as a "Host" local authority by virtue of a small area of the red line boundary for the Transmission Assets being located within Blackpool Council – see Plate 4.4 and paragraph 4.2.3.10. That is Work No.19A19B, shown on Works Plans – Onshore and Intertidal – Part 1 of 2 (AS-016). The Applicants welcome the Council's representation and their notification that they will be providing a LIR.
RR-0248 248.11	<p>Relevant Representation: Blackpool Borough Council: Landowner</p> <p>We submit this Relevant Representation on behalf of Blackpool Borough Council (the "Council"), in its capacity as a Landowner for the proposed development consent order application made by Morgan Offshore Wind Limited ("Morgan OWL") and Morecambe Offshore Windfarm Ltd ("Morecambe OWL"), (together, the "Applicants").</p>	The Applicants note the response and are in ongoing dialog with the Council regarding the land rights sought for the Transmission Assets. The Applicants issued the heads of terms to the Council on 8 th November 2024 and are due to reissue the terms based on negotiations with the Council in the coming weeks.

Reference	Relevant Representation Comment	Applicants' response
RR-0248 248.12	The Applicants seek the grant of a development consent to construct, operate and maintain, and decommission two electrically separate transmission systems (the "Transmission Assets"), which are proposed to connect to the Morgan and the Morecambe Offshore Wind Project: Generation Assets ("Application").	The Applicants will continue to engage with the Council and negotiate the heads of terms for the land rights sought through voluntary agreement. Progress on these negotiations will be submitted in the land rights tracker throughout Examination, as requested by the Examining Authority.
RR-0248 248.13	The Council provides initial comment on matters that relate to the content and scope of the Application, in respect of the Council's interests as landowner of a number of holdings within and adjoining the Application DCO redline area (current & future uses). Potential impacts identified in this Representation are an indication only by the Council at this initial stage of proceedings; detailed comments will emerge through the Council's oral and written involvement in the Examination.	
RR-0248 248.14	Landholdings held by the Council within or adjoining the Application are summarised below, with detail to be provided at the earliest opportunity in the Examination process:	
	Landholdings held by the Council within or adjoining the Application are summarised below, with detail to be provided at the earliest opportunity in the Examination process: a. Lytham St Annes Beach (area known as Starr Gate) b. 20 acre parcel adjacent to Leach Lane c. Land held by Blackpool Airport (as a wholly owned subsidiary of the Council)	

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	<p>d. Land parcels located adjoining the Blackpool Airport Enterprise Zone.</p> <p>e. Blackpool Airport Enterprise Zone: Main Council landholdings include (but not limited to) the following uses:</p> <p>i. Blackpool Airport</p> <p>ii. Babcock Offshore Mission Critical Services operating the North West Air Ambulance</p> <p>iii. Spirit Energy – providing helicopter support to the offshore oil field. iv. Westair Flying School</p> <p>v. Fixed wing and helicopter flying schools</p> <p>vi. Handling agents, executive private jets and bespoke aviation vii. Various fixed wing and rotary maintenance organisations</p> <p>viii. General aviation services including circuits, instrument training, night flying, airport parking and refuelling</p> <p>ix. Military training flights, medvac flights, police & coastguard helicopters</p> <p>x. Development sought by planning application (Ref: 23/0589) submitted to Fylde Council for '<i>Hybrid planning application relating to Enterprise Zone development consisting of Full Application for the construction of new access roads, existing highways improvement works and drainage works; and Outline Application for the construction of 4 hangers, a commercial unit (Class B2/E(G)) and car parking, alongside associated infrastructure works with access applied for and all other matters reserved</i>'.</p>	

Reference	Relevant Representation Comment	Applicants' response
RR-0248 248.15	<p>In summary rights are sought by the Applicants in respect of land holdings within the DCO redline include:</p> <p>a. Site plots 02-007 – 02-012, 02-024 - 02-032, 03-005 - 03-012; 04-001, 04-002, 04-009, 04-010, 04-012, 4-024, 05-003, 31- 016; and</p> <p>b. Works packages 1A/B, 5A/B, 6A/B, 9A/B, 10A/B, 11A/B,12A/B, 13A/B, 14A/B, 16A/B, 19A/B, 34A/B, 36A/B, 54A/B.</p>	
RR-0248 248.16	<p>The Council has concerns over the current drafting of the Application, including (but not limited to):</p> <p>a. lack of detail and clarity in the current Application and supporting documents, in particular the EIA, CTMP and TMP;</p> <p>b. Risk of sterilisation of land within the Enterprise Zone; and</p> <p>c. The extent of rights and land sought over land within the Council's ownership or control.</p>	<p>Please see the Applicants' response to RR-248.6 regarding concern of lack of detail and clarity in the Application.</p> <p>Please see the Applicants' response to RR-248.19 regarding concern of risk of sterilisation of land within the Enterprise Zone.</p> <p>The detail around the land rights sought in each plot can be found in the Book of Reference (AS-011), Schedules 7A, 7B, 8A and 8B of the draft DCO (AS-004), and shown in the Land Plan – Onshore (AS-019). The proposed works are set out in Schedule 1 (Authorised Project) of the draft DCO (AS-004), and shown in the Works Plans - Onshore and Intertidal Part 1 of 2 (AS-016) and Works Plans - Onshore and Intertidal Part 2 of 2 (AS-017).</p> <p>The requirement for land take is set out in detail within the Statement of Reasons (AS-009). Further detail on the extent of land required for the development will be further refined at detailed design stage, after consent would be granted. However, as is common practice for projects of this nature. In the meantime, the Applicants will continue to engage with the Council regarding the land rights sought and any future plans.</p> <p>Please see the Applicants' response to RR-248.7 for detail on the extent of rights and land sought over land within the Council's ownership or control.</p>

Reference	Relevant Representation Comment	Applicants' response
RR-0248 248.17	The Application lacks detail and justification for the flexibility requested by the Applicants in respect of the proposed cable routes, construction and operational methodology. There is therefore a corresponding lack of detail as to the extent and necessity of the proposed temporary rights, and the permanent rights to be acquired. Consequently the Council are unable to fully assess disturbance to current and future users located on Council owned land, including through temporary interference and permanent sterilisation of land use. By way of example, the impact of the Application on the viability of the Airport operations (which affect the Council interest as land owner and funding shareholder), has not been properly assessed	Please see the Applicants' response to RR-248.7 above.
RR-0248 248.18	There is uncertainty in the Application as to the extent of land reserved for temporary construction and permanent wayleaves and leases of construction compounds and jointing bays. This uncertainty inhibits the Council's ability to plan for: a. intended future projects, such as the solar farm and airport expansion: and b. setting aside Council funding/budget for airport operations and projects: and c. more widely, its ability to progress with certainty of development within the Enterprise Zone (for which it is the accountable body), such as the Silicon Sands development which may include data centres and other nationally significant infrastructure.	Please see the Applicants' response to RR-248.7 above.

Reference	Relevant Representation Comment	Applicants' response
RR-0248 248.19	The Application may sterilise, curtail, and/or delay much needed private sector investment potential of property within the locality, with the potential loss of required investment, and delay in receiving new business rates which are ringfenced by statutory instrument to fund the Enterprise Zone investment. A specific example, the Application lacks sufficient details regarding the management of surface and sub-surface water drainage during construction and operation. The Council is unable to determine how landholdings are affected by any changes to site drainage, on which the Council has spent significant funds upgrading.	<p>The Applicants will continue to engage with the Council to better understand future development on the land currently within the Order Limits and work with the Council to mitigate losses where practicable at this stage.</p> <p>The Applicants have made a commitment (CoT84 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) that in order to manage impacts to field drainage, the Outline CoCP (APP-193) stipulates field drainage plans will be developed in consultation with the relevant landowners. If required, additional field drainage will be installed to ensure the existing drainage of the land is maintained during and after construction. This is secured by Requirement 8 within Schedules 2A and 2B of the draft DCO (AS-004). Detailed CoCP(s) will be developed in accordance with the Outline CoCP and approved by the local planning authority in consultation with Lancashire County Council (as the lead local flood authority) or with the Environment Agency, as appropriate. The Applicants also refer the Council to the Outline Surface and Groundwater Management Plan (APP-202) which forms part of the Outline Code of Construction Practice (oCoCP) (APP-193) and sets out measures to manage surface water runoff and site drainage from construction to minimise the pollution risk to waterbodies. These measures will be agreed through the discharge of requirements with the relevant authorities through the submission of detailed Surface and Groundwater Management Plans. This is secured through, Requirement 8 in Schedules 2A and 2B of the draft DCO (AS-004).</p>
RR-0248 248.20	Highways considerations are currently not fully quantified in the Application, with insufficient detail in the CTMP and TMP, particularly, on routing, traffic quantum, and cumulative impacts of current uses. The movement of abnormal loads, road closures and diversionary routes	<p>Please see the Applicants' response to RR-248.06 above.</p> <p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement (APP-108) contains an assessment of the potential impacts from the Transmission Assets on traffic and transport receptors, including the</p>

Reference	Relevant Representation Comment	Applicants' response
	<p>should be agreed with all the major landowners, and such agreement to be set out clearly in the CTMP.</p>	<p>potential impacts of increased vehicle movements (i.e. Heavy Goods Vehicles (HGVs) and staff movements) and potential impacts resulting in congestion. To inform the assessment, the Applicants have undertaken a comprehensive data collection exercise including capturing of baseline traffic flows, speeds, identification of sensitive receptors and collisions for all highway links within Blackpool Council, Lancashire County Council and National Highways administration areas. In total, data for 91 highway links have been collected covering over 155 km of highway network. Details of the forecast quantum of construction traffic are provided within Table 7.21 of ES Volume 3, Chapter 7: Traffic and Transport (APP-108).</p> <p>The assessment has considered the potential impacts of the Transmission Assets in relation to driver delay, severance, non-motorised user delay, fear and intimidation, road safety and abnormal loads and concludes that (with the application of mitigation measures) residual effects would not be significant in Environmental Impact Assessment (EIA) terms. In addition, the data contained within Volume 3, Chapter 7: Traffic and Transport (APP-108) has informed the assessment of traffic related tourism effects which are considered within Volume 4, Chapter 2: Socio Economics of the ES (APP-141) (which considers tourism effects). Appendix A and B of the Outline Construction Traffic Management Plan (APP-211) provides details of the proposed HGV routes to be used by construction traffic.</p> <p>The Applicants note that significant commitments have been made to the use of trenchless installation techniques, such as Horizontal Directional Drilling to minimise disruption by ensuring that all roads and railways (with the exception of Leach Lane) crossed by the Transmission Assets remain open (see CoT02, Volume 1, Annex 5.3: Commitments Register (AS-030). This commitment to the use of trenchless techniques is secured via Requirement 8 (Code of Construction Practice) of Schedules 2A and 2B of the draft DCO (AS-004).</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>The approach to managing highway crossings is outlined in Section 1.8 of the outline Construction Traffic Management Plan (OCTMP) (APP-211). The detailed CTMP(s) will be produced in accordance with the OCTMP in consultation with, and for approval by, the relevant highway authority, as is secured by Requirement 9 in Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>Volume 1, Annex 5.5: Cumulative Screening Matrix and Location Plan of the Environmental Statement (APP-039) provides details of the methodology for identification of cumulative projects for consideration and have identified where cumulative impacts have the potential to give rise to likely significant effects for traffic and transport impact assessment topic areas within the Cumulative Effects Assessment (CEA). It also provides the CEA long list (both onshore and offshore) and cumulative effects screening matrix.</p> <p>The Applicants have provided a detailed response to Lancashire County Council's Relevant Representation on traffic and transport matters and have a met with LCC to discuss their comments and agree the approach to ensuring the traffic and transport effects from the Transmission Assets can be effectively managed. The Applicants expect that Blackpool Borough Council's traffic and transport matters will largely be aligned and would welcome the opportunity to discuss this approach.</p>
RR-0248 248.21	The Application reserves maximum flexibility to the Applicants including what appear as access routes into and out of the airport, residential areas, SSSI and public open space. A portion of the beach affected by the Application is in Council ownership and exists for public use.	Schedule 1 (Authorised Project), of the draft Development Consent Order (AS-004) provides details of the work activities required for the construction, operation and decommissioning of the Transmission Asset application. The Works Plans – Onshore and Intertidal (AS-016) Works Plans – Onshore and Intertidal Part 2 of 2 (AS-017) illustrate where these works can take place. The Applicants can provide further clarifications to the Council if the Council has uncertainty regarding the flexibility applied for within the Application.

Reference	Relevant Representation Comment	Applicants' response
		<p>The Statement of Reasons (APP-013) states that the powers applied for within the draft DCO (AS-004) “<i>will allow the necessary works to take place for the development and operation of the Transmission Assets. They have been drafted to be comprehensive, whilst allowing flexibility within the process to ensure as low an impact on those affected as possible.</i>” Should the Council require further justification, the Applicants welcome discussion with the Council as to this necessary flexibility.</p> <p>The Applicants have made a commitment (CoT44 of Volume 1, Annex 5.3: Commitments Register of the ES (AS-030)) to install the offshore export cables under Lytham St Annes SSSI and the St Annes Old Links Golf Course via trenchless installation technique to mitigate potential effects associated with the construction of the landfall. This is secured in the outline Code of Construction Practice (APP-193) which is secured by Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004). The trenchless technique crossing covers the area where Blackpool Council has land interests over the sand dunes.</p> <p>The northern area of the beach, at Starr Gate slipway, where Blackpool Borough Council also has an interest, is shown on the Work Plans – Onshore and Offshore Part 1 of 2 (AS-014) as part of Work Nos. 19A19B which is a temporary working area to facilitate construction activities on the beach including access for land based equipment and to allow the launch of small shallow draft vessels (see sections 3.10.2 and 3.14.5 in Volume 1, Chapter 3: Project Description (AS-024)). The slipway is a temporary access point only with no equipment storage at this location with the Applicants using the slipway within the parameters of its existing usage in order to launch/recover small vessels/work boats and to traverse plant to the beach work areas to the south of Starr Gate slipway (Work Nos 4A4B and 5A5B in AS-014 in the Works Plans – Onshore and Offshore Part 1 of 2 (AS-014)).</p>

Reference	Relevant Representation Comment	Applicants' response
		<p>Appendix A of the Outline Public Rights of Way (PRoW) Management Plan (AS-048) provides detail regarding public access at Lytham St Annes Beach. For activities along the length of the beach, from the direct pipe exit pits to Mean Low Water Springs (such as for direct pipe installation and offshore cable pull-in and burial), a section of the beach would need to be temporarily closed off to public access, for short durations, while certain activities are taking place. In such cases, the Applicants will implement managed crossings either to the seaward or landward side to allow users to maintain access across the beach.</p> <p>Detailed management measures for how such closures at the beach would be undertaken will be agreed with the relevant planning authority as part of the detailed PRoW Management Plan(s) secured through Requirement 8 of Schedules 2A and 2B of the draft DCO (AS-004).</p> <p>The Access to Works Plan (APP-157) and outline Highway Access Management Plan (APP-213) provide additional detail on the construction and operational accesses proposed for the Transmission Assets, including the access routes into and out of Blackpool Airport. Access routes into and out of the airport are subject to discussions with Blackpool Airport Operations Limited (RR-245) and Blackpool Airport Properties Ltd. (RR-246) and are in ongoing dialogue with both parties. The Applicants have provided detail on those discussions in the Applicants' response to Rule 9 letter (AS-067).</p>
RR-0248 248.22	The Application does not offer certainty as to the extent, reasons and duration of interference, both during and after construction. Consequently, the Application overreaches and fails to adequately justify the extent and necessity of the rights to be acquired. Altogether, the lack of this information means that the Council cannot fully consider the impact on its own land holdings, as a result of the Application.	The Applicants refer the Council to section 1.10 (Case of Powers of Acquisition Sought) of the Statement of Reasons (AS-009), which sets out the Applicants' proposals and justification for each class of acquisition. This includes explaining where the Applicants are seeking necessary flexibility for the detailed design stage, and it may be that the final land take is less than identified. As set out at RR-248.16, the full details of the powers sought by the Applicants are set out in Schedules 7A, 7B and 8A and 8B of the draft DCO (AS-004) and the Book of Reference (AS-011).

Reference	Relevant Representation Comment	Applicants' response
		<p>The Applicants have provided an additional technical note on construction scenarios, submitted in response to a request from the ExA within the Rule 9 letter (AS-070). Section 1.5 of the ES assessment of Construction Scenarios outlines the overarching construction scenarios considered for the Transmission Assets and includes specifics on the potential construction durations.</p> <p>The maximum indicative construction duration is 66 months under the sequential construction scenario (where the first offshore wind farm transmission assets complete construction, and the second offshore wind farm transmission assets commences construction immediately). AS-070 also explains that when considering a gap of 4 years between the first offshore wind farm transmission assets completing construction and the second offshore wind farm transmission assets commencing construction, this would equate to an overall period of 120 months although active construction activities would only take place for a combined period of up to 66 months for the transmission assets of both offshore wind farms.</p>
RR-0248 248.23	In light of the above, the Council requests to be registered as an Interested Party to the examination and reserves the right to make further representations during the examination process in response to any further information provided by the Applicant.	The Applicants welcome further engagement with the Council throughout the Examination process.