

**Application by Morgan Offshore Wind Limited and
Morecambe Offshore Windfarm Limited for an
Order Granting Development Consent for the
Morgan and Morecambe Offshore Wind Farms
Transmission Assets**

Written Representation of Blackpool Borough Council



May 2025

Blackpool Borough Council's Written Representation as landowner and owner of the Blackpool Airport companies.

1. Blackpool Borough Council ('Council') submits this written representation in its capacity as landowner and owner of the Blackpool Airport companies, on the application for a Development Consent Order (DCO) for the transmission assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm ('Application'), submitted by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (together, the 'Applicants').

Blackpool Borough Council's position on the Application

2. The Council neither supports nor opposes the Application. The Council at this stage reserves its position subject to further information from the Applicant to satisfy itself of its key concerns regarding the proposed development, set out in this written representation and the LIR.

Blackpool Borough Council's key issues as land and infrastructure owner

3. The Council is the owner of the Blackpool Airport operational and property holding companies, Blackpool Airport Operations Limited, and Blackpool Airport Properties Limited (the ownership structure is set out in the Council's submission at Deadline A [PDA-033]).

Blackpool Airport

4. It is critical for the ongoing viability of the Blackpool Airport that the proposed development has no operational or reputational/commercial impacts on the airport during construction or operation phases.
5. The proposed development red line boundary includes rights and works areas which cover not only the Airport land but also the main Airport runway. These Works and rights currently retain the flexibility to be undertaken as either trenchless or open trench construction. The Applicants are requested to commit to all cable installation at the Airport by trenchless drilling, or set out a detailed engineering explanation as to why they are unable to do so.

Land sterilisation

6. The Council is concerned that its land interests around the Blackpool Enterprise Zone and the Blackpool Airport may be sterilised or adversely impacted by the works requested in the Application. Protective Provisions in the dDCO are requested by the Council.
7. The northern access runs through land earmarked for development of the Silicon Sands digital campus as part of the Council's plans for the Blackpool Enterprise

Zone. This has potential to delay or restrict the development of the Enterprise Zone, or make the Enterprise Zone less attractive to prospective occupiers. The Council seeks greater detail and firmer commitments as to what the northern access route will be used for by the Applicant, and timings for such use.

8. The cables are proposed to traverse the Airport land south of the runway and rights include land across the main Airport runway. The application documents do not provide commitments as to the depth which these cables will be laid or the construction methodology. If the cables are laid too shallow, the potential future uses of this land will be significantly restricted, and the land could be sterilised entirely.
9. Inclusion of the main airport runway in the DCO redline boundary should be removed by submission of a request for an amendment to the Examination Authority. Any impact to the operations of Blackpool Airport operations are unable to be funded by the Council.

Extent of rights sought over Council owned land

10. Guidance requires the Applicant to show certainty and necessity as to intended use of the land for the project and associated rights sought to be acquired, as sufficient to justify the interference of human rights in contravention of Article 1.
11. The Council considers that the Application does not demonstrate rights sought to be acquired are justified to meet the requisite tests of necessity, certainty, and proportionality. Particularly with respect to the Starr Gate accessway, and interference with the runway at Blackpool Airport as being reasonably required to deliver the Scheme. The tests under the Planning Act 2008 have not been met.
12. The compelling benefit in the public interest of the interference with the public accessway from Starr Gate and interference of the operations at the Blackpool Airport is not proven. The lack of detail as to the need for the rights sought (both in scope and duration) also means there is insufficient certainty that the rights sought are required for the proposed development.

Drainage infrastructure:

13. The Council is not the local flood authority for the majority of the land within the proposed order limits. However, The Council owns drainage infrastructure within and adjacent to the order limits, which may be affected by works and hydrological impacts of the proposed development. The direction of flow for the existing airport / main runway surface water drainage is east towards the Queensway to main river before crossing Queensway to join the main Moss Sluice system.

14. Drainage channels are the responsibility of riparian owners to maintain. The local context is such that the main river which takes away storm water, located to the south of the River Ribble, is at capacity with a shallow gradient and subject to tidal influence and prone to localised flooding. Therefore development on the EZ at Eastern gateway is subject to provisions restricting surface water discharge to greenfield run off rates necessitating extensive on site attenuation.
15. Changes to the drainage eco-system which increase overall discharge to the existing system or interrupted flows and increased localised flooding would have a significant impact on the airport, the EZ and surrounding residential and agricultural property. The Southern area of the airport identified for the solar farm and the Transmission route is poorly drained with a high water table and subject to local flooding with run off of storm water and investment required to improve existing field drainage. These drainage systems may easily be impacted by the transmission routes – with onsite attenuation potentially required to prevent further overloading of the eastward flowing drainage system.
16. The drainage system located within the Airport land is prone to sand infiltration requiring regular cleaning to maintain flow capacities and prevent localised flooding and standing water. The additional problem to the Airport operations is unwanted bird activity attracted to any standing water. Any construction impacts on the existing drainage system would be problematic, and may result in a partial closure / temporary restriction of Airport operations.

Review of the Applicants' response to the Council's Relevant Representation

17. The Applicants' response to the Council's Relevant Representation overstates engagement with the Council. The Council welcomes meetings which have arisen as a result of the Hearings attendance and look forward to future proactive engagement.