

Written Summary of Oral Submissions of Blackpool Borough Council at the Issues Specific Hearing 1 ('ISH1') and Compulsory Acquisition Hearing 1 ('CAH1')

This Deadline 1 document is provided by Blackpool Borough Council ('the Council') in its capacity as a unitary local authority, (Host and Neighbouring Authority), and in its capacity as landowner of various land holdings located within the proposed Development Consent Order ('DCO') order limits and owner of the Blackpool Airport companies.

The oral submissions by the Council at the ISH and CAH Hearings held by the Examining Authority during the week commencing 28 April 2025 in relation to the requested Development Consent by the Morgan and Morecambe for the Offshore Windfarm Transmission Infrastructure (the 'Development') are summarised below.

Open Floor Hearing 1 (OFH1)

The Council attended the OFH1, and made no oral representations. Following a review of the transcript during OFH1 the Council has no further comments.

Issue Specific Hearing 1 (ISH 1)

1. Agenda Item 3: Relevant Policies

Blackpool Council Local Plan policies

1.1. In response to questions from the ExA, the Council explained that the relevant Blackpool Council Local Plan is the Blackpool Local Plan 2012-2027 ('Local Plan'), comprising two parts.

1.1.1. Part 1: Core Strategy was adopted in January 2016.

1.1.2. Part 2: Site Allocations and Development Management Policies adopted in February 2023.

1.2. The Council further noted that preparation of a new Local Plan for Blackpool up to 2045 has begun, but it is not anticipated that any new draft policies will be sufficiently progressed to become a material consideration during the lifetime of this DCO Inquiry process. Local Plan policies considered the most relevant are set out in the Council's Local Impact Report.

2. Agenda Item 5: Scope of Proposed Development

Starr Gate

2.1. The Applicants made oral submissions that the access known as Starr Gate private road and slipway, which runs from Fylde Beach Sand Dunes to the junction of Squires Gate Lane, Clifton Drive North and New South Promenade, will only be used occasionally by vehicles towing trailers with equipment to

support cable landing only, and that there was no intent to close the Starr Gate accessway. the Council thanked the Applicant for the further details, and for their offer to provide a note detailing the proposed use of the Starr Gate private road and slipway.

2.2. The Council outlined the users of Starr Gate private road and slipway, which includes emergency service, active and passive recreation users, Tram access, RNLI, Sailing Club, Angling Club, and HM Coast Guard. The access known as the Starr Gate slipway is suitable for consistent use by light vehicles and small trailers vehicles towing boats only, and not necessarily for access by heavier vehicles. The Council welcomed further discussions with the Applicant to enable agreement as to necessary investigations and possible strengthening works, to protect utilities or for structural integrity, should they establish a potential need for larger vehicles or plant to use the slipway.

2.3. The Council also highlighted the implications of the two telecom and data cables (Aquacomms and Vodaphone) which run under the beach (through the sand under the dunes), then alongside and under the Starr gate slip way. The Aquacomms cable and Vodaphone asset are not laid within concrete beneath beach and dunes and consequently could be readily subject to damage from heavy plant crossing this.

Post-hearing Note: *In relation to the Starr Gate access, the Council requests:*

- a. a third party assessment of the structural integrity of the slipway and for axle loads to then be limited to comply with that assessment, with surface protection to be agreed if the slipway is to be used for items of tracked plant; and*
- b. that the Applicants consider whether the requisite necessity and proportionality tests have been met with respect to the rights currently sought under the draft DCO.*

Blackpool Airport

2.4. The Applicants described the proposed works packages across the Airport from west to east. The Council highlighted that as the owner of Blackpool Airport they are unable to fund and consequently accept any potential partial or full closure of the Blackpool Airport. Even a short period of closure or reduced operations may affect the long term viability of airport operations due to inability to recoup lost revenue, and would inflict significant reputational damage.

2.5. During discussions, the Council noted that the phrase used by the Applicants to 'ensure as far as possible the safe and efficient operation of the Airport' is insufficient reassurance. The Council request that the terminology is changed to 'no partial or full closure or adverse effect on the Airport operations and reputation'.

2.6. During discussions regarding the substation connection, the Applicants advised that the north access through the Airport was included in response to the s.42 public consultation where concerns were raised by the community regarding all construction traffic using the proposed access to the south. The Applicants described the necessity of construction accesses at the north and south of the airport to be provided for the Scheme in order to reduce the traffic activity for residents (by spreading the construction traffic across the two accesses).

Post hearing Note: *The Council notes that while the dispersion of construction traffic is acknowledged, the proposed northern access is along a live airport taxiway, and across a live runway. This is of concern as the rights sought may impact on the current airport operations, future airport operations and design freedom, and scope of the Silicon Sands digital campus at the Enterprise Zone.*

The Council seek confirmation that all traffic management using this access route, which includes the use of banksmen etc, will be coordinated with the Council local highway team and Blackpool Airport, and look forward to meeting with the Applicants.

Construction working hours and mobilisation period

2.7. Following comments from the Applicants and Fylde Borough Council, Blackpool Borough Council noted that as a unitary authority it also has a local highway authority function, and looks forward to further engagement from the Applicants.

Community Benefits

2.8. The ExA noted that the Statement of Reasons is very light on local benefits, and requested that the Applicants consider whether they needed to prepare an updated note on benefits on the local community.

2.9. The Council welcomed this request, and commented that the local authorities had a brief verbal discussion that morning regarding the employment and skills plan, and the possibility of a joint s.106 Agreement in light of the proposed local government reorganisation.

3. Agenda Item 6: Scope and Contents of the Applicants Assessment

Traffic and transport

- 3.1. Multiple parties noted that the traffic and transport assessment requires clarification and further work, and the Applicants acknowledged and agreed to engage with the Council in relation to concerns regarding the traffic and transport assessment. Blackpool Council as local highways authority welcomed this commitment to engagement.

Compulsory Acquisition Hearing 1 (CAH1)

The Council attended the CAH1, and made no oral representations. Following a review of the transcript during CAH1 the Council has no further comments.