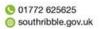
Date: 20th June 2025

Your ref EN020028





Civic Centre West Paddock Leyland Lancashire PR25 1DH



Deadline 2 Representation by South Ribble Borough Council

Planning Inspectorate Ref: EN020028

Morgan and Morecambe Offshore Wind Farms Transmission Assets

1. Introduction

- 2. Comments are hereby presented on behalf of South Ribble Borough Council ('the Council') and sets out the Council's thoughts with regards to the following. The order in which they are presented should not be taken to imply any degree of significance.
 - Comments on written representations
 - Comments on local impact reports
 - Comments on the applicants revised draft Development Consent Order
 - Comments on the applicants draft itinerary for accompanied site inspection

Comments on written representations

Having regard to the written representation provided by other parties, the Council must refer to the following:

- a) the Council concurs with Blackpool Councils comment (REP1-070) that it neither supports nor opposes the proposal.
- b) South Ribble Borough Council remains concerned that the proposal documentation remains incomplete, and that environmental assessment is inadequate as noted by a number of respondents including Fylde Borough Council (REP1-079)
- c) As suggested within REP1-095 (Preston City Council) at paragraphs 4.5.4 4.5.6, the hours of construction of 8am to 6pm seem to be more acceptable and protective of the amenity of residents of South Ribble, regardless of rebuttal by the applicant in document PDA-026 to South Ribble's Relevant Representation RR-2027-45, which appears to completely disregard the Councils concerns. (see DCO comments below).

Comments on local impact reports

No additional comments to make other than the Councils formal LIR submission

Comments on the applicants revised draft Development Consent Order

Having regard to the aforementioned draft DCO, please note the Councils comments:

- a) South Ribble Borough Council defers to Lancashire County Council as the highways authority for all matters relating to the highway.
- b) Part 6, Point 47: Inconsistent Planning Permission This paragraph states that 'conditions of a planning permission granted ... which relate to land within the order limits or land adjacent to order limits cease to have effect to the extent they are inconsistent with the authorised project'.

May I again draw your attention to Point 17 of the Councils written reps (REP1-097 May 2025) with regards to the recently granted, partially constructed planning permission for a battery storage facility on Howick Cross Lane, Penwortham. For your convenience this is repeated below:

'Crown Land – It is noted that land identified on plan DM_22003214_CLP_1. Sheets 8 and 9 are in the ownership of the King's Most Excellent Majesty In Right Of His Duchy Of Lancaster, and the Ministry of Housing, Communities and Local Government. MHCLG Parcel 18.005 however also forms part of planning permission 07/2024/00013/VAR issued by this Council which has been implemented for development of a 49.99 MW Battery Storage Facility, with associated infrastructure and landscaping. The western section of this site which has been developed, is shown on drawing MOR001-FLO-CON-ENV-PLN-0031-MRCNS-J3303-JVW-10012 as being proposed for 19A/19B (Morgan/Morecambe construction access works), and may no longer be an available route for construction access. An extract from the approved site plan is provided below'.



Figure 1Approved site layout - ref 07/2024/00013/VAR:

- c) Schedule 1, Part 1 (Authorised Development) work numbers 30A/B and 31/B identify construction compounds of up to 30,000m². In the Council's opinion this is excessive particularly as the area within the Council's boundary is limited.
- d) Schedule 2A/2B Point 14 As noted in both Relevant (PDA-026) and Written (REP1-097) representation provided by this Council, the construction hours quoted, which includes 7am to 7pm, and 24hr trench work are considered excessive. Notwithstanding emergency works, the amenity of South Ribble residents is paramount and reduced hours where practicable are requested.
- e) Schedule 2A/2B Point 16 the Council welcomes the inclusion of a prescribed, 12-month landscape restoration period.
- f) Schedule 2A/2B Point 19 the Council questions why Employment and Skills would be subject only to consultation with Lancashire County Council. South Ribble would request consultation with its own Economic Development team.
- g) Schedule 11A/11B removal of hedgerow and important hedgerow within South Ribble is considered to be excessive, but subject to full, compensatory mitigation is on balance accepted as necessary.
- h) Whilst detail is provided in the DCO with regards to compensation for various parties, there is no mention of a Community Benefit Fund for those local residents affected by the proposal. The applicant in response to Relevant Representation (RR-2027-45) in document PDA-026 states 'the Department for Energy Security and Net Zero has recently published its guidance on Community Funds Morgan and Morecambe Offshore Wind Farms: Transmission Assets Document S_PD_3.2.19 Page 39 for Transmission infrastructure. The Applicants will take cognisance of this guidance in the creation of a fund and liaise with the Local Planning Authorities on its establishment'. 'Taking cognisance' is not in the Council's opinion a commitment to providing community funding. Discussion with the applicant has proven fruitless on this matter and this lack of detail or commitment at such a late stage is concerning.

Comments on the applicants draft itinerary for accompanied site inspection (ASI)

a) An itinerary for the ASI has not been provided, but the Council has lodged a request to attend. It is not considered necessary however for the Council's representative to attend ASI visits north of the River Ribble.

Comments on any further information/submissions received by deadline 1.

a) No comments to note with regards to Mr Cliff's site visit of the 19-21st May 2025

This representation is submitted for, and on behalf of South Ribble Borough Council. Should you have any comments or questions please do not hesitate to contact us

Best regards