

Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for the Morgan and Morecambe Offshore Wind Farms Transmission Assets

Preston City Council's answers to the Inspector's questions – 7th July 2025

SECTION 1: General and cross-topic questions

Scope of the development and general matters

Q1.1.5

Construction working hours

Proposed construction hours are set out in Requirement 14 of Schedule 2A and 2B of the dDCO [REP2-004].

b) Noting that core working hours from 7:00am until 7:00pm (Monday to Saturday) are proposed, with an hour before/ after for set-up and close down works, are there any particular locations where the proposed hours including mobilisation activities might be more likely to lead to issues of unreasonable noise and disturbance for local residents and/or other receptors? If so, what reduced working hours would be reasonable in such locations?

Within the Preston City Council (PCC) district area, the proposed development would not be located in close proximity to residential areas. However, there are residents living at Old Hall Farm, set to the east of the site, who may be affected by the proposed construction hours. Therefore, PCC would recommend construction hours 7am – 7pm Monday to Friday, 7am-1pm Saturdays and no working on Sundays and Bank Holidays.

c) The recent 'Request for Information' letter from the Secretary of State for Energy Security and Net Zero regarding the Mona Offshore Wind project (EN010137) requested that the applicant provide, without prejudice, updated documents to refer to more restrictive working hours of 7:00am to 1:00pm on Saturdays. Please comment on this request in relation to the proposed development, including whether the construction working hours should be similarly amended.

PCC would raise no objection to the proposed amended hours.

The Environmental Assessment

Q1.3.1

New/recently consented developments

The applicants' response [REP2-031] to paragraphs 4.6.1 to 4.6.4 of Preston City Council's written representation [REP1-095] appears to take account of the consented developments at Pheonix Park and Land off Riversway in terms of overall cumulative effects but it is not clear that these consented developments have been assessed in

terms of the specific effects of the proposed development upon their users and occupiers.

b) Are there any other recent developments, where updates are required to assess the impacts of the proposed development upon their current/future occupiers

No further developments have been granted planning permission since PCC's submitted statement in January 2025, which would be required to be taken into consideration as part of the assessment of the proposed development.

SECTION 2: The draft Development Consent Order (sDCO)

Articles

Q2.1.6

Article 2 (Development consent etc. granted by the Order)

- a) This article would grant development consent for both projects, subject to development consent being granted for the associated generation assets. Notwithstanding that paragraphs (2) and (3) may be removed as appropriate if the generation assets are granted prior to the making of the Order, is the current drafting of these paragraphs suitably robust and enforceable for its intended purpose*

PCC recommend that the reference is made to the Development Consent Orders, which have been applied for in Article 2.

Q 2.1.17

Article 36 (Trees subject to tree preservation orders (TPO))

Paragraph 1.10.1.2 of the Tree survey and arboricultural impact assessment – Part 1 of 2 [APP-128] says that at the time of submission, there is currently no impact on TPO trees. Bearing in mind paragraph 22.3 of Advice Note Fifteen: drafting Development Consent Orders, does this remain to be the position? If there are not TPO trees likely to be affected, is this article necessary and, if it is, should there be provision for consent to be required prior to any works to, currently unknown, trees subject to a TPO?

PCC can confirm that there are no tree preservation orders within its district area that would be affected by the proposed development.

Q2.3.3 – The matters raised in this question will be addressed within the Statement of Common Ground.

Q.2.4.1 – The matters raised in this question will be addressed within the Statement of Common Ground.

SECTION 3: Air quality

Q3.1.1

Commitments

Project Commitment (CoT) 33 [REP2-011] states “An Outline Dust Management Plan (DMP) has been prepared as part of the Outline CoCP and submitted as part of the application for development consent. Detailed CoCP(s) will be developed in accordance with the Outline CoCP. The measures in the detailed DMP(s) will accord with guidance set out by the Institute of Air Quality guidance Management (IAQM, 2024) where appropriate and practicable, and will include measures for monitoring and reporting dust levels, and dust suppression and mitigation measures during construction and operation.”

b) Do you consider this approach to be adequate?

PCC consider this to be adequate with regards to dust suppression and monitoring, but request that dust monitoring and management information is provided or made available upon request.

Q 3.1.3

Air quality assessment baseline

Air quality assessment baseline in the Environmental Statement (ES) Air quality (9.6.1.6) [APP-121] states that “Concentrations measured during 2020 and 2021 may have been affected by the COVID-19 lockdowns and are not therefore necessarily representative of current concentrations as outlined in the IAQM Position Statement on ‘Use of 2020 and 2021 Monitoring Datasets’ (IAQM, 2021). Nevertheless, measured concentrations have been considered to ensure the assessment is conservative.

Is this information representative of the current air quality baseline, given it was predominantly gathered during the COVID19 pandemic when air quality data could have been disproportionately affected?

PCC’s Environmental Health Officer confirmed that a best practice approach has been taken in Environmental Statement in relation to air quality. On this basis, the Local Planning Authority considers that the information submitted is satisfactory for the PCC district area.

Q 3.1.7

Air quality effects during construction

NPS EN-1 paragraph 5.7.9 states that construction should be undertaken in a way that reduces emissions, such as the use of low emission mobile plant during construction as appropriate, and that consideration should be given to making this mandatory in DCO requirements.

a) *Should this be a mandatory requirement, and if not, why not*

PCC considers that this should be a mandatory requirement.

SECTION 6: Ecology and nature conservation

Q6.1.10

Commitments

CoT16 [REP2-010] states “All vegetation requiring removal will be undertaken outside of the bird breeding season. If this is not reasonably practicable, the vegetation requiring removal will be subject to a nesting bird check by a suitably qualified ecological clerk of works. If nesting birds are present, the vegetation will not be removed until the young have fledged or the nest failed.”

b) *Do you consider the proposed wording to be adequate*

PCC consider the above wording to be satisfactory. However, we would advise the following requirement is added: *If bird nesting habitats are discovered, detailed bird nest surveys by a suitably experienced ecologist shall be carried out immediately prior to works and written confirmation provided that no active bird nests are present, which has been agreed in writing by the Local Planning Authority.*

Q6.1.11

Commitments

CoT31 [REP2-010] states “Ponds identified during the route planning and site selection process have been avoided where possible. During construction any newly identified ponds will be avoided through micro-siting of the onshore export cable corridor and 400 kV grid connection cable corridor where reasonably practicable.”

b) *Do you consider the proposed wording to be adequate?*

PCC consider the word to be satisfactory, but should also include the requirement for replacement ponds where ponds are to be lost.

Q6.1.13

Commitments

CoT101 [REP2-010] states “Where high concentrations of peat are identified these, will be avoided where practicably possible for the placement of the plant and infrastructure to avoid the possibility of ground gas build up. Where this is not possible, further investigation and appropriate monitoring will be identified undertaken, if necessary”.

c) *Do you consider the proposed wording to be adequate?*

PCC consider that specific reference to the Outline Soil Management Plan should be included.

Q6.1.14

Commitments

CoT126 [REP2-010] “To mitigate for potential temporary habitat loss associated with Mill Brook Valley Biological Heritage Site, temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable.” a) Define “wherever reasonably practicable”. b) Explain how you will mitigate for potential temporary habitat loss if it’s not deemed “reasonably practicable”. c) Do you consider the proposed wording to be adequate

PCC concur with the comments made by FBC that the wording should be amended to read: *To mitigate and compensate for potential temporary habitat loss associated with Mill Brook Valley Biological Heritage Site, temporary construction compounds will be micro-sited to avoid the site wherever reasonably practicable, and mitigation and compensation measures will be proposed if avoidance is not reasonably practicable.*

SECTION 11: Historic Environment

Q11.1.6

Interim trial trenching report

Paragraph 1.1.2.1 of the Interim trial trenching report [APP-103] explains that, in total, 222 trenches have been proposed across the onshore infrastructure area and that, as of August 2024, 139 trenches have been investigated. It goes on to say that further trial trenching and geoarchaeological investigation will be undertaken post consent and prior to construction. Paragraph 1.2.2.1 states that, to date, the evaluation has comprised the excavation of 73 of the 222 trenches proposed.

- d) To what extent does the shortfall in the evaluation of trial trenching ahead of the assessment, weaken the overall findings in the ES in relation to onshore archaeology? Please explain your reasoning

PCC would refer consideration of issues relating to archaeology to Lancashire County Council who are the authority for the Historic Environment in Lancashire.

SECTION 14: Noise and vibration

Q14.1.10

Commitments

CoT18 [REP2-010] states “Core working hours for the construction of the intertidal and onshore works will be as follows: • Monday to Saturday: 07:00 - 19:00 hours; and • up

to one hour before and after core working hours for mobilisation (“mobilisation period”) i.e. 06:00 to 20:00. Activities carried out during the mobilisation period will not generate significant noise levels (such as piling, or other such noisy activities). In circumstances outside of core working practices, specific works may have to be undertaken outside the core working hours. This will include, but is not limited to, works being undertaken within and/or adjacent to Blackpool Airport and cable installation at landfall and at the River Ribble. Advance notice of such works will be given to the relevant planning authority.” In relation to the statement “Advance notice of such works will be given to the relevant planning authority.”

- a) *Is it sufficient for the local authorities that advance notice will be given or should this be changed so that works, outside of the core hours secured by Requirement 14 (Schedules 2A and 2B) in the dDCO, are to be agreed with the relevant planning authority in writing in advance and must be carried out within the agreed times?*

PCC would agree with the ExA’s suggestion that works, outside of the core hours secured by Requirement 14 (Schedules 2A and 2B) in the dDCO, are to be agreed with the relevant planning authority in writing in advance and must be carried out within the agreed times.

Q14.1.13

Construction noise

Paragraph 1.2.2 of the Outline construction noise and vibration management plan [APP-196] covers the erection of physical barriers:

- a) Are you satisfied with the proposed process?
b) Should timings be specified in relation to advance notification where consultation is required?

PCC consider the proposed process is satisfactory and that the timings should be specified within any advance notification.

Q14.1.15

Construction noise

Outline construction noise and vibration management plan [APP-196], paragraph 1.2.1.1 states that “In certain circumstances, specific works may have to be undertaken outside the core working hours to maintain time critical activities. Where applicable, these activities will be notified to the relevant planning authority at least 48-hours’ notice in advance of the works.”

- a) *Is a minimum of 48-hours’ notice of advance of the works sufficient?*

PCC would consider this to be satisfactory.