

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

Blackpool Borough Council's responses to the Written Questions of the Examining Authority



July 2025

ExQ	QUESTION	BBC RESPONSE
1.	General and Cross-Topic Questions	
Q1.1.5	<p>Construction working hours</p> <p>Proposed construction hours are set out in Requirement 14 of Schedule 2A and 2B of the dDCO [REP2-004].</p> <p>a) Requirement 14(2) for both projects provides for circumstances where works may take place outside the core working hours specified in 14(1). These include a range of works (a) to (g) including generalised elements such as “where continuous periods of construction are required” and “any other time-critical element”. Whilst noting that provision in 14(3) for such works to be subject to 48 hours’ advance notice to the relevant planning authority, can the applicants provide a more detailed justification for the flexibility sought for the certain works identified in (a) to (g)?</p> <p>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?</p> <p>c) The recent ‘Request for Information’ letter from the Secretary of State for Energy Security and Net Zero regarding the Mona Offshore</p>	<p>The proposed working hours are beyond those typically provided for in BBC planning permission conditions (being 0800 – 1800 Monday to Friday and 0800 – 1200 Saturdays and no working on Sundays and Public Holidays), and BBC has as yet been unconvinced as to why the extended hours are required. BBC’s standard construction management plan condition is annexed to this submission.</p> <p>The proposed development is within close proximity to a number of classes of sensitive receivers (residential properties, and businesses such as the care home in the dunes area) which will be sensitive to the intrusive activities at early and late hours, and weekends. BBC is opposed to the extended working hours. The proposed core working hours (07:00–19:00, Monday to Saturday, with a 1-hour mobilisation period before and after) are excessive in and close to residential areas. Harmful impacts would arise from noise, vibration, and light nuisance, especially during the early morning, late evening and weekend periods.</p> <p>BBC suggest that restrict construction hours to 08:00–18:00 (Monday–Friday) and 08:00–13:00 (Saturday), with no works on Sundays or Bank Holidays, and site is secured and tidy which may be undertaken during the last hour. BBC standard template planning condition in relation to construction management plan is set out below for assistance to the ExA.</p>

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	<p>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.</p>	
Q1.1.13	<p>Statements of Common Ground (SoCG)</p> <p>Deadline 3 (7 July 2025) includes the submission of updated SoCG, including summaries of the principal areas of disagreement and statement of commonality.</p> <p>Relevant parties where a SoCG has been requested should fully engage with the SoCG process. The ExA requests fully considered SoCGs including summaries of the principal areas of disagreement.</p> <p>For statutory undertakers, where there is documented evidence that matters, including protective provisions, are agreed and no other matters of disagreement remain, then a statement from parties to this effect would suffice. In the absence of such a statement, where protective provisions are being negotiated and even if agreement is expected to be reached, then a brief and focused SoCG or position paper should be progressed, focusing on the matters where differences remain between the respective parties, rather than an unnecessarily long SoCG. It is not sufficient for these to be just recorded in the applicants' Land Rights Tracker as this is not a document that is necessarily agreed with the relevant statutory undertaker.</p>	<p>BBC is continuing to engage with the Applicants in progressing a Statement of Common Ground. Topic specific meetings for Transport have been held which have successfully narrowed the scope of outstanding issues. Further topic specific meetings are being diarised.</p>

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Q1.3.1	<p>New/recently consented developments</p> <p>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.</p> <p>a) Noting that the Land off Riversway residential development has commenced, can the applicants provide details of their assessment of the impacts of the proposed development upon these receptors, on the basis that they could be in use/occupied prior to the commencement of either Project A or Project B?</p> <p>b) Are there any other recent developments, where updates are required to assess the impacts of the proposed development upon their current/future occupiers?</p>	<p>Two recent decisions at Blackpool Airport are considered to be relevant to the assessment of effects of the proposed development:</p> <ul style="list-style-type: none"> - Approval of a scheme of hangars and a commercial unit (and associated infrastructure)(ref: 23/0589 Fylde & ref: 23/0634 Blackpool); and - Decision confirming no EIA is required for the proposed solar farm at Blackpool Airport (ref: 24/0478).
3.	Air Quality	
Q3.1.1	<p>Commitments</p> <p>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</p>	<p>The effects of dust from the proposed development will be more acutely felt in other LPA administrative areas, rather than Blackpool. BBC supports Fylde Borough Council's position that the oDMP that LPAs must have recourse to require action where effects are considered to be unacceptable.</p>

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	<p>(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."</p> <p>(a) Define the process of identification of what is considered "where appropriate and practicable"?</p> <p>(b) Do you consider this approach to be adequate?</p>	<p>Further, departure from the IAQM, 2024 should not be permitted simply when it is 'practicable'. Justification for such departure should be submitted to the relevant responsible authority for approval.</p>
Q3.1.3	<p>Air quality assessment baseline</p> <p>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."</p> <p>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?</p>	<p>As noted in response to Q3.1.1, whilst the effects of the proposed development on air quality may affect the Enterprise Zone, and as a result of an increase in traffic, impacts will be more acutely felt in other LPA administrative areas, rather than Blackpool. BBC supports and defers to Fylde Borough Council's position on the wider concerns within this topic. BBC support the statement that the use of 2020–2021 data as an air quality baseline is inappropriate due to pandemic-related anomalies (e.g., significantly reduced traffic and NOx levels). Although air quality in BBC's administrative area is generally good, data from those years do not reflect typical conditions and may underestimate the project's potential impact</p> <p>The construction and decommissioning phases have the potential to generate dust and there are concerns in respect of the potential impact of foreign object debris (FOD) resulting from the Scheme which currently proposes to route construction traffic down the main taxiway. FOD refers to any object in an airport environment which could injure personnel or damage aircraft. Any such object would create potential safety hazards and impact operations at the airport. The mitigation proposed will need to be wholly effective with constant supervision during the works to prevent</p>

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		this taking place. This should be set out fully within the Dust Management Plan.
Q3.1.4	<p>Meteorological data used for dispersion modelling Air quality assessment baseline in the ES Air quality chapter [APP-121] Table 9.29 states that "Uncertainties arise from any differences between the conditions at the met station and the development site, and between the historical met years and the future years. These have been minimised by using meteorological data collated at a representative measuring site. The model has been run for a full year of meteorological conditions. This means that the conditions in 8,760 hours have been considered in the assessment."</p> <p>() Explain why one year of meteorological data is considered sufficient?</p> <p>(a) How have seasonal and annual variations in weather patterns been considered?</p> <p>(b) Are the local authorities satisfied with the approach in relation to meteorological data used in the dispersion modelling?</p>	As noted in response to Q3.1.1, The effects of the proposed development on air quality will be more acutely felt in other LPA administrative areas, rather than Blackpool. BBC does not have in house expertise to assess the meteorological dispersion modelling, and therefore supports and defers to Fylde Borough Council's position on this topic.
Q3.1.7	<p>Air quality effects during construction</p> <p>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</p>	BBC is of the opinion that yes, the use of low emission mobile plant equipment should be a mandatory requirement pursuant to NPS EN-1 Acknowledging that the availability of such equipment can be a constraint,

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	<p>emission mobile plant during construction as appropriate, and that consideration should be given to making this mandatory in DCO requirements.</p> <p>(a) Explain how are you going to comply with this policy? Has consideration been given to a commitment to the use of low emission vehicles or plant?</p> <p>(b) Should this be a mandatory requirement, and if not, why not?</p>	<p>BBC would accept that non-compliance with this requirement could be acceptable with written approval of the relevant responsible authority.</p>
4.	Aviation and Radar	
Q4.1.1	<p>Blackpool Airport</p> <p>BBC state at paragraph 2.5 of their post hearing submissions [REP1-071] that, during discussions, the phrase used by the applicants that they would "ensure as far as possible the safe and efficient operation of the airport" is insufficient reassurance and requests that it is changed to read "no partial or full closure or adverse effect on the airport operations and reputation".</p> <p>Please comment on this request?</p>	<p>BBC considers that it important the safe aviation activities and commercial operations of the Airport with access to its facilities be retained at all times. The Airport has a regulatory obligation to ensure that its aviation infrastructure remains active and operational at all times. It is not economically viable for the Airport to be subject to closure. Disruption to services would result in air traffic having to be diverted elsewhere and in instances such as this, in the experience of BBC, users do not return to using the original facility once it is operational again and the knock-on effect to the reliability and reputation of the airport would be prohibitive to its future.</p> <p>It is acknowledged that the Airport is seeking to enter into a commercial agreement with the Applicants which would secure amongst other things specified working areas and construction methodologies. BBC is liaising with the Airport in this regard and understands that negotiations are substantially progressed. However, in the event that the commercial agreement is not entered into, as the ultimate owner of the Airport, BBC</p>

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		would require the Applicants to provide confirmation of the construction methodologies, depth of cables and other relevant matters, and the extent of the Order limits within the Airport boundary would need to be revised so as to avoid any impact on the operational runway.
5.	Compulsory acquisition, temporary possession and other land or rights considerations	
Q5.1.1	<p>Starr Gate accessway</p> <p>It is noted that there have been further meetings between BBC and the applicants. The Council has questioned [REP1-069] whether the proposed works in the area of the Starr Gate accessway meet the statutory tests for compulsory acquisition as set out in the Planning Act 2008 (PA2008). Is this still the Council's position? Please can the applicants provide an assessment as to how the tests have either been met or not met in this specific area?</p>	<p>BBC's position regarding the rights sought over the Starr Gate accessway remains unchanged. Starr Gate has been the subject of ongoing discussions between BBC and the Applicants.</p> <p>The oCMP at page 31 has been amended to include a description of the access requirements at Starr Gate, which is welcomed by BBC. "The Applicants have identified a potential need for low-tide vessels to be launched during construction activities to facilitate installation of the landfall. Access to the beach in the event of emergencies would also be required." It is noted that mitigation would be discussed with BBC as part of finalising the CTMP.</p> <p>Consequently, the rights sought over Starr Gate are overly extensive and unnecessary. Therefore, in this respect of the rights sought over Starr Gate the dDCO does not meet the relevant statutory tests. BBC request that these rights currently sought are removed from the dDCO.</p> <p>For completeness, BBC holds a similar view with respect to the egress to the northern access to the airport off Squires Gate Lane, and would seek that any powers not required for the proposed access via the northern access be removed from the DCO. BBC would be content with suitable traffic management arrangements, subject to details being agreed with</p>

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		the applicants. These matters are the subject of ongoing discussions with the applicants as part of the SoCG discussions.
Q5.1.2	<p>Blackpool Airport</p> <p>Where the proposed cable route crosses Blackpool Airport, the land is subject to rights in favour of the Secretary of State for Defence by virtue of the provisions contained in a conveyance dated 2 April 1962. What do these rights relate to and has the Secretary of State been consulted?</p>	A conveyance dated 2nd April 1962 reserved rights in favour of the Vendor (the Minister of Aviation and so benefitting any Crown Entity). The conveyance is noted on the Land Registry title. It is for the Applicant to show that the proposed Development does not interfere with these rights.
6.	Ecology, biodiversity and nature conservation (on-shore)	
6.1	Ecology and nature conservation	
Q6.1.10	<p>Commitments</p> <p>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."</p> <p>() Define under what circumstances it wouldn't be "reasonably practicable"?</p> <p>(a) Do you consider the proposed wording to be adequate?</p>	BBC considers the proposed wording to be broadly adequate, but would suggest that the point at which birds have fledged (or the nest failed) will also need to be determined by a suitably qualified ecological clerk of works. It would also be useful for the 'bird breeding season' to be defined.
Q6.1.11	Commitments	Ponds are highly unlikely to be encountered within the Blackpool Borough Council administrative area due to its limited scope within the DCO redline

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	<p>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."</p> <p>() Define "reasonably practicable". How is the decision made and on what basis. What if it's not deemed "reasonably practicable".</p> <p>(a) Do you consider the proposed wording to be adequate?</p>	<p>boundary. BBC will therefore defer to Fylde Borough Council in this matter.</p>
Q6.1.13	<p>Commitments</p> <p>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".</p> <p>() Explain how you will determine if it's "practicably possible" to avoid high concentrations of peat that are identified.</p> <p>(a) Explain the decision-making process in relation to determining if further investigation and appropriate monitoring is necessary.</p> <p>(b) Do you consider the proposed wording to be adequate?</p>	<p>Peat is unlikely to be encountered within the Blackpool Borough Council administrative area due to its limited scope within the DCO redline boundary. BBC-owned land affected by the proposed development is also not known to contain high concentrations of peat. BBC is therefore content to defer to FBC and LCC in this matter. LCC is, by mutual agreement, the Minerals and Waste Authority for the Blackpool administrative area.</p>

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Q6.1.14	<p>Commitments</p> <p>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."</p> <p>() Define "wherever reasonably practicable".</p> <p>(a) Explain how you will mitigate for potential temporary habitat loss if it's not deemed "reasonably practicable".</p> <p>(b) Do you consider the proposed wording to be adequate?</p>	<p>The Mill Brook Valley Biological Heritage Site not within the BBC administrative authority. BBC therefore defers to the relevant responsible authority, and consider that the LPA approval should be required where mitigation measures are to be put in place for temporary habitat loss.</p>
6.2	Biodiversity net gain (BNG)	
Q6.2.1	<p>Biodiversity calculations:</p> <p>() Provide reasoning for the proposed percentage (%) in the biodiversity benefit strategy - 59.62% increase for the habitat, 20% for watercourse, 41.37% for hedgerow.</p> <p>(a) Explain in detail the methodology used and why the scheme won't fully comply with future biodiversity net gain requirements i.e. why the whole length of the corridor has not been assessed?</p> <p>(b) The ExA requests the BNG metric spreadsheet used for the calculations is submitted into the examination.</p> <p>(c) Confirm whether clarity exists on how the calculations have been done and is there agreement on the</p>	<p>No agreement has been reached with BBC at this stage, as BNG has not been discussed with the applicants. BBC will review the BNG metric spreadsheet used for the calculations when it is submitted to the ExA, and provide comment if it considers it necessary to do so.</p> <p>BBC does have concerns that the areas presented for habitat creation and enhancement should be certain but are entitled 'indicative'. Calculations must be undertaken by the Applicants when/if the areas set aside for habitat creation and enhancement are confirmed. It is stated that where access could not be obtained habitat calculations were based on existing datasets – the applicants should confirm the extent of area that could not be accessed, where existing datasets were taken from (are they appropriate) and then what implications this may have on the assessment and any appropriate mitigation. The scope of the assessment of onshore</p>

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	methodology and the spatial areas for which the calculations have been presented?	biodiversity benefit is limited to areas of permanent habitat loss and should be extended to meet statutory criteria.
Q6.2.2	Mitigation Hierarchy Confirm that the applicants have adequately followed the mitigation hierarchy in respect to no biodiversity net loss and biodiversity net gain.	BBC do not have in house expertise and would be required to send the Onshore Biodiversity Benefit statement and Ecology statement to consultants to review. BBC do not have the funding for this analysis. The BBC recommends that the ExA in making their decision should understand the intended length of time 'temporary' habitat losses and are anticipated and likely effects, together with the timeframes around habitat reinstatement within these locations and consider whether the provision of additional off-site habitat creation and enhancement is appropriate.
Q6.2.3	Site selection Selection guiding principles are set out in paragraphs 1.2.1.2 and 1.2.1.3 of Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas [REP2-046] submitted at D2. () Explain why the selection guiding principles set out do not include specific safety considerations and policy requirements including potential for increased risk to defence activities? (a) Explain if any alternatives for BNG strategy have been considered, including off-site delivery. (b) If BNG requirements and the avoidance and/or mitigation of defence aviation risks cannot be met,	BBC is yet to engage with the Applicants substantively on BNG, however would be open to offsite BNG being secured through s.106 obligations, provided there is demonstrable compliance with the mitigation hierarchy.

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	<p>please explain how excluding BNG areas from the order limits might affect your comments on the application.</p>	
14.	Noise and vibration	
Q14.1.10	<p>Commitments</p> <p>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."</p> <p>() 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?</p>	<p>BBC acknowledges that there may be a legitimate need to work outside designated core hours. However, in these circumstances the core hours are already extended above normal planning permissions and must be balanced with the heightened sensitivity of receivers at night, and other heightened risks which requires active management (for example, traffic management).</p> <p>In light of the extended core hours above normal constructions works BBC does not consider it sufficient for advanced notice to be issued by the Developer in consideration of works outside of the core hours. The DCO should require the Applicants to agree in advance, in writing with the relevant local authority and the local highways authority when works are proposed to take place outside of the core working hours with formal sign off procedures, to ensure that mitigation measures are put into place. Additionally, local residents who are potentially affected by late night works should be notified in advance following Council approval.</p>

ExQ	QUESTION	BBC RESPONSE
	(a) What would be the expected frequency and duration of such works and over what period might they be expected to continue in any specific location?	
Q14.1.13	<p>Construction noise</p> <p>Paragraph 1.2.2 of the Outline construction noise and vibration management plan [APP-196] covers the erection of physical barriers:</p> <p>() Are you satisfied with the proposed process?</p> <p>(a) Should timings be specified in relation to advance notification where consultation is required?</p>	<p>The Applicants propose physical barriers in the Outline Construction Management Plan to mitigate noise and vibration which includes bunds and other such physical barriers. Information should be able to be provided to the ExA in particular if wooden noise barriers are to be installed as to where the physical barriers may be required and the form it is anticipated such barriers will take. Additionally, the timing should be ascertained from the outline construction programme and be agreed in advance with BBC as to enable effects to be properly understood.</p> <p>Council approval for any mitigations and not simply notification should be included as a requirement.</p> <p>Scenario assessments should be undertaken and BBC consider that a range of scenarios are appropriate as the impacts created through maximum noise levels over one period and lower noise levels over a greater period of time, may create different impacts which require different mitigation.</p>
Q14.1.15	<p>Construction noise</p> <p>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</p>	<p>Works outside of the core hours secured by should be agreed with the relevant planning authority in writing in advance and must be carried out within the agreed times. Notification as to the start of these works should depend upon the extent of the period of time the work outside core hours is undertaken and if residents and business do not need to be notified and the extent is one or two nights then 48 hours is acceptable. However, if the works are prolonged then the timeframe should ensure</p>

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	<p>activities will be notified to the relevant planning authority at least 48-hours' notice in advance of the works."</p> <p>() Is a minimum of 48-hours' notice of advance of the works sufficient?</p> <p>(a) Are affected residents going to be notified in advance of the works?</p>	<p>that residents are properly informed and if necessary, arrangements made for traffic to be diverted.</p> <p>Agreement with the LPA and/ or Local Highways Authority as to the expected frequency and duration of such works and over what period might they be expected to continue in any specific location should form part of the approval process.</p>
15.	Socio-economic effects	
Q15.1.1	<p>Outline Employment and Skills Plan</p> <p>The provisions in the Outline Employment and Skills Plan (oESP) [APP-239] are noted together with the consultation with Lancashire County Council as contained in Requirement 19.</p> <p>() Please update the Examining Authority (ExA) on progress with their discussions following issue specific hearing 1 (ISH1) relating to the oESP and the possibility of negotiating a section 106 planning agreement.</p> <p>(a) Blackpool Borough Council have requested that the plan should be subject to their approval – can this be agreed?</p>	<p>Discussions are yet to progress. The Council and the Applicant will likely be in a position to update the Council in the next iteration of the SoCG after D3.</p> <p>BBC express concern at the lack of firm commitments which bind the Applicants to deliver set provisions within the Outline Employment and Skills Plan. As an example, an employment and skills plan must include co-operation with the Blackpool & the Fylde College Lancashire Energy HQ to support the local community skills agenda.</p> <p>The Employment and Skills document should be subject to the Council's approval rather than notification to ensure all relevant considerations have been addressed. BBC consider that the requirements of the Plan be secured by a S106 agreement to ensure that they remain readily enforceable by the Councils throughout the lifetime of the Scheme.</p> <p>Amendment is sought to the current drafting in the dDCO of requirement 19 to ensure greater certainty of delivery of apprenticeships and the use</p>

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		of local labour and businesses during the construction and operational periods.
Q15.1.4	<p>Tourism</p> <p>The applicants have sought to justify their approach to tourism in their response at deadline 1 [REP1-046] and in particular refer to a number of recent Development Consent Order (DCO) decisions where a similar approach has been taken. At paragraph 1.3.1.14 the applicants refer to the earlier representation from FBC [RR-0705] which indicated that 1 in 10 jobs were involved in tourism which is apparently a lower percentage than in most coastal communities.</p> <p>Are the Councils satisfied with the applicants' response on this matter?</p>	<p>The current assessment on tourism underestimates the importance of Blackpool and the wider Fylde coast as a popular seaside destination with tourism and the service sector underpinning the local economy. Based upon the provisional figures for 2023 for employees by industry sector, published by LCC, 13% of all employees in Blackpool work within the 'accommodation and food services' sector and 5.7% within the 'arts, entertainment and leisure' sector, which suggests a higher percentage of jobs involved in tourism related jobs than those the applicant has referred to.</p> <p>Responses are considered to be vague and high level with document [REP1-046] making no reference to major events which occur in Blackpool or the wider Fylde Coast throughout the year. This document refers to recreation based impacts and impacts upon visual amenity but does not appear to consider the potential economic or traffic related impacts raised by BBC within their LIR.</p> <p>Traffic and access are likely to be disrupted during the works and if the rights which remain over Starr Gate and Squires Gate Lane are enabled by the Applicant disruption would result in limited access for tourists at a detriment to businesses within the area. This could have a detrimental impact upon visitor perception during the works, with concerns over potential congestion potentially deterring visits and thus reducing visitor numbers and ultimately having a knock-on effect to the local economy.</p>

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		<p>The proposals should support the maintenance of safe and convenient access for all, particularly given the importance of tourism-based events and activities for the Fylde Coast's economy. Currently, a lack of information regarding the proposed scheme's programme prevents a full assessment of the possible impacts.</p> <p>A further concern for BBC is 'perception': visitors, in particular potential return visitors, may be put off by the development works and the delays they may cause in accessing the key tourism areas of Blackpool. This is of particular concern with a drawn out, consecutive construction scenario.</p> <p>BBC are aware that event management measures are being proposed by the applicants as part of the oCTMP, and look forward to further detail as to what this will entail.</p>

Blackpool Borough Council: template Construction Management Plan condition.

(a) Prior to the commencement of any development on site, a Demolition/Construction Management Plan shall be submitted to and agreed in writing by the Local Planning Authority. For the purpose of this condition, the Demolition/Construction Management Plan shall specify the provision to be made for the following:

- i. measures to prevent detrimental impact on air quality including confirmation that no materials would be burned on site and dust mitigation measures to be followed during the demolition/construction period:
- ii. measures to control noise emanating from the site during the demolition/construction period:
- iii. hours and days of demolition/construction work for the development. Please note that typically acceptable working hours are 0800-1800 Mondays to Fridays and 0800-1200 on Saturdays with no working on Sundays or Public Holidays:
- iv. details of contractors' compounds and other storage arrangements, to include position, means of screening, storage heights, details of enclosures, and appearance of any structures or cabins:
- v. provision for all site operative, visitor and construction loading, off-loading, parking and turning within the site during the demolition/construction period including all requirements for occupation of areas of highway:
- vi. arrangements for the provision of wheel washing facilities comprising a 10m x 3.5m wheel wash with two 6m long ramps to be operated during the demolition/construction period to minimise the deposit of mud and debris on the adjacent highways:
- vii. provision of a board at the entrance to the site, to be retained throughout the construction period, to include 24hr contact details for site management; and provision of contact details for the contractor's street sweeping subcontractor with specific authorisation for the Council as Local Highway Authority to call out that contractor as and when required.
- viii. measures to prevent contamination of surface and sub-surface water bodies during the demolition/construction period, and prevent the runoff of surface water to the highway in storm conditions during construction: and
- ix. a condition survey of the adopted public highway up to the first junction with the strategic road network along the proposed construction traffic route, or other area as may first be agreed in writing with the Local Highway Authority, along with a construction stage timeline proposal for the provision further condition surveys (either post-completion or to include surveys at appropriate intervals depending upon the duration of the construction period).

(b) The demolition/construction of the development shall thereafter proceed in full accordance with the approved Demolition/Construction Management Plan.

(c) Each condition survey required pursuant to part (a)(x) of this condition shall be accompanied by a scheme and timing schedule of any works as may be appropriate to rectify any dilapidation caused to the adopted public highway as a result of demolition and construction works related to the development hereby approved, to be agreed in writing by the Local Planning Authority. These works shall then be carried out in full in accordance with this agreed scheme and schedule.

Please note, the submission of a standard Health and Safety statement will not be sufficient to discharge this condition. As part of any discharge of condition application you will be expected to highlight the location of each element of information required above within your submission.

Reason: In the interests of the amenities of surrounding residents and to safeguard environmental quality and the character and appearance of the area in accordance with Policy CS7 of the Blackpool Local Plan Part 1: Core Strategy 2012-2027 and Policies DM31 and DM36 of the Blackpool Local Plan Part 2: Site Allocations and Development Management Policies 2012-2027. This condition is required to be discharged prior to commencement in order to ensure that the development proceeds without causing undue harm to residential amenity, highway safety or the quality of the environment.