

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 summary of Oral Submissions of Blackpool Borough Council at the Issues Specific Hearings 2 (ISH2), and 3 (ISH3), and Compulsory Acquisition Hearing 2 ('CAH2'), and Responses to Hearing Action Points Submission



August 2025

This Deadline 4 document is provided by Blackpool Borough Council (**'BBC'**) 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 (**'ExA'**) during the week commencing 28 July 2025 in relation to the requested Development Consent by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for the Offshore Windfarm Transmission Infrastructure (**'Proposed Development'**) are summarised below.

This document also includes the responses to Action Points arising from the ISH and CAH Hearings, or otherwise refers to where a response has been provided separately.

Where relevant, the Council has included further commentary signposted as 'Post-Hearing Notes' where it was considered to be of use to the ExA.

Issues Specific Hearing 2 – Environmental, Onshore and Offshore matters

Agenda Item 1 General Matters

Statements of Common Ground

1. BBC confirmed it agreed with the Applicants' summary of progress to date of the Statement of Common Ground (**'SoCG'**), noting that discussions are underway and BBC looked forward to further constructive engagement to resolve outstanding issues.

Intention to submit Change Request:

2. Invited by the ExA to comment on the 'Notification of Intention to Submit a Change Request Application' [AS-081] submitted by the Applicants, BBC thanked the Applicants for the proposed Change Request and noted that it looked forward to the detail of the Change Application being provided. BBC noted that it was seeking assurances that the Squires Gate Lane access to Blackpool Airport is either removed from the DCO order limits, or otherwise that land plot 02-028 (and the associated plots 02-024 to 02-027, inclusive) comprising the Squires Gate Lane access to Blackpool Airport will not be used by the Applicants for construction purposes.
3. **Post-Hearing Note:** *Following the Hearings the Applicants have provided the BBC with the revised works plans to be entered at Deadline 4, demonstrating that the Squires Gate Lane access to Blackpool Airport has been removed from the order limits. BBC supports this amendment.*

Agenda Item 3 Aviation

4. Invited by the ExA to comment on the Co-Operation Agreement being entered into by Blackpool Airport and the Applicants, BBC noted that it concurred with the joint statement provided by Blackpool Airport and the Applicants, and is progressing with the Council's governance processes to complete the agreement and looked forward to the Applicants' proactive support in facilitating this.

Agenda Item 4 Onshore ecology (including Habitats Regulations Assessment (HRA))

Biodiversity Net Gain (BNG)

5. Invited to by the ExA to comment on the discussion regarding BNG, BBC noted that it supported the position outlined by Fylde Borough Council ('**FBC**') and Lancashire County Council ('**LCC**'), and supported the request that a requirement be submitted to secure BNG.

Agenda Item 6 Hydrology and flood risk

6. BBC commented that it owned significant drainage infrastructure on the Blackpool Airport site, which had been referred to in previous submissions, and had now acquired a copy of the drainage infrastructure plan which it will provide to the Applicants.
7. **Post hearing Note:** *This Plan has now been provided to the Applicants for their information. A copy of this drainage infrastructure plan is appended to this Submission at Appendix 1.*

Agenda Item 9 Socio economic effects

Outline Employment and Skills Plan

8. Following discussions regarding the appropriate approving authority for the Employment and Skills Plan in the dDCO, BBC along with FBC acknowledged the need for a single approving authority and committed to providing an agreed position by Deadline 5, along with substantive comments on the Employment and Skills Plan.
9. **Post hearing Note:** *BBC's substantive comments on the Employment and Skills Plan have been submitted to the examination at Deadline 4 in the document entitled 'Outline Employment and Skills Plan – Blackpool Borough Council Comments'.*

Action Point 42: Agree and report to the applicants which authority should be the approval body under Requirement 19 of Schedule 2A and 2B of the dDCO (Employment and Skills Plan), including an explanation of how this will work.

10. The Councils are in discussion and arranging a time to meet on this issue, but have not yet had the opportunity to agree a final position. The Councils will update the Examination at Deadline 5.

Review of assessment on tourism

11. BBC noted that it did have additional comments regarding tourism over and above those provided in its LIR, which are the subject of ongoing discussions with the Applicants.

Action Point 40: Submit additional points on tourism not already covered in Blackpool Borough Council's local impact report.

12. BBC's additional comments on the tourism impacts of the proposed development on Blackpool have been provided in the document entitled 'Tourism Impacts on the Borough of Blackpool – Additional Comments for Input into Revised Tourism Assessment'.

Agenda Item 10 Traffic and transportation

13. **Post-Hearing Note:** *BBC reserved its position on this Agenda Item at the Issues Specific Hearing on the basis of ongoing discussions with the Applicants. However, following the representations made regarding the Starr Gate accessway's implications for (1) tourism impacts (above), and (2) the extent of possessory powers sought under the dDCO (at the CAH2 Hearing on 1 August 2025), BBC notes to the Examination that it does have residual traffic concerns centred around the proposed use of Starr Gate. The basis of those concerns are set out in response to CAH2 Action Point 2 below.*

Issues Specific Hearing 3 – Draft Development Consent Order (dDCO)

Agenda Item 4 dDCO Articles

Action 6: Submit any further comments on articles 3 (Development consent etc. granted by the Order), 8 (Defence to proceedings in respect of statutory nuisance), 10 (Power to alter layout etc. of streets) and 47 (Inconsistent planning permissions).

14. BBC has outlined its position on each article in its post-hearing notes below.

Article 3

15. BBC queried whether Article 3 should be dependent upon ‘implementation’ of the Generation Assets development consent orders, rather than the grant. The Applicants' explanation regarding practical realities of dual implementation of DCOs and the timing of works was acknowledged by BBC, and noted any further comments would be provided in writing at Deadline 4.

16. **Post-Hearing Note:** *BBC is content for the trigger in Article 3 to remain as ‘grant’ of the Generation Assets DCOs.*

Article 8

17. BBC noted it's objection is likely subject to the change request. In response to explanation from the Applicant's BBC acknowledged the explanation and took it away for D4.

18. **Post-Hearing Note:** *BBC is content with the Article as drafted and withdraws its objection.*

Article 10

19. The ExA invited comments from BBC on Article 10, being the power to alter layout (etc.) of streets, as an action for response at Deadline 4.

20. **Post-Hearing Note:** *BBC is content with the Article as drafted, due to the control in Article 10(3) (i.e. the requirement for the power not to be exercised without the consent of the street authority), and withdraws its objection provided this control is retained.*

Article 35

21. The ExA invited comments from BBC on Article 35 as an action for response at Deadline 4.

22. **Post-Hearing Note:** *BBC is content with the Article as drafted and withdraws its objection.*

Article 47

23. The ExA invited comments from BBC on Article 47, regarding the implementation of inconsistent planning permissions, as an action for response at Deadline 4.

24. **Post-Hearing Note:** *BBC is now content with the Article as drafted and withdraws its objection.*

Comments from parties on any other Requirement and/or the need for further Requirements.

25. The ExA enquired as to whether the BBC was still pursuing an Unexploded Ordnance Survey for the Airport, and a template Construction Management Plan condition. BBC noted it would take these matters away and respond in writing at Deadline 4.

Action 34: To confirm whether the proposed requirement concerning unexploded ordnance at Blackpool Airport remains a concern.

26. BBC confirms that it is no longer seeking a requirement for an unexploded ordnance survey requirement for Blackpool Airport.

27. BBC also confirms that it is content with the updated oCTMP, and is no longer seeking a template Construction Management Plan.

Agenda Item 6 Schedules 2A and 2B – Requirements (Projects A and B)

Requirement 8 – Code of Construction Practice

28. During discussions regarding the outline Communications Plan, BBC noted that it had reviewed the oCP, and considered it to be standard for outline plans of its kind, and only comment would be to include regular meetings with a local liaison committee. BBC noted that this level of detail would likely come through at the detailed Communications Plan stage and considered the oCP to be fit for purpose.

Compulsory Acquisition Hearing 2

Agenda Item 4 Representations by affected persons

Action 2: Submit the joint statement between the applicants, Blackpool Borough Council and Blackpool Airport.

29. BBC provided the below Joint Statement on behalf of the Council and Blackpool Airport and the Applicants:

The Applicant, Council and Airport have been in dialogue, and an onsite meeting took place on 1 May 2025 between Mr Roberts, for the Council and Airport, and Mr O'Brian and Ms Jones for the Applicant.

Initial HoTs were issued to the Airport and the Council in 2024 and whilst discussions have taken place, the focus has been on the Airport's cooperation agreement which is the precursor to the Land Agreements.

Mr Roberts provided a detailed response in writing to the draft terms on 3 May 2025 which were passed to Delcore Maclaren who replied during this week. As an agreed position has been reached on the cooperation agreement It is intended for Delcore Maclaren and Mr Roberts to arrange a further meeting to discuss those HoT's.

30. BBC noted that it does have other land holdings as well, and in particular noted the critical intersection of Starr Gate, welcoming progress including the removal of the street works powers over Starr Gate in the proposed changed request. BBC does have residual concerns regarding Starr Gate and the slipway ramp, including the rights sought and the ultimate use, and are yet to be satisfied that the powers sought are appropriate and proportionate. BBC signposted to the ExA that the Council has instructed Counsel for an opinion on this issue to be submitted at Deadline 4.
31. BBC agreed with the ExA's comment on the difficulty of the Starr Gate site, both in its difficult access to the beach and the importance of the intersection around the tram station. BBC noted the interrelation of the tourism, access, and traffic impacts at this location, and is proposing to collate these workstreams for submission to the Examination. Finally, BBC noted the ongoing work with the applicants to date.
32. In response to the ExA's comments as to the impacts on the coastal cycleway which routes along the Starr Gate slipway, BBC noted that this is something which has been identified by the Council, and likely options for re-routing of that cycle lane will require users to cross the tramlines and onto the road along the Promenade, which has raised safety concerns. This is a further reason for the Council's position that Starr Gate should not be closed at any time during the construction of the proposed development.
33. The Applicants noted that the public rights of way which utilise the Starr Gate accessway (Lancashire Coastal Way, and National Cycle Route 62) were intended to be removed from Schedule 5A/5B of the dDCO to be entered at Deadline 4. BBC acknowledged this and thanked the Applicants.

Action 4: Submit comments as necessary regarding Starr Gate including comments regarding the cycle route.

34. BBC considers that the Applicants fail to demonstrate why temporary possessory rights are necessary over Starr Gate (Plots 02-007 to 02-012, inclusive) for the proposed use set out in the oCTMP: access for 4x4 vehicles and small aquatic craft. As the proposed use amounts only to 'access', possessory rights are not considered to be justified in the public interest as

sought to be acquired through the DCO. There are alternative arrangements which may be put in place with the Council to enable the use required by the Applicants. The Council are open to such discussions.

35. BBC has submitted an Advice Note drafted by Douglas Edwards KC on this matter to the Examination at Deadline 4.

36. While the proposed amendments to the DCO at Deadline 4 and as part of the proposed Change Request are acknowledged, BBC is not satisfied that these changes go far enough. In particular:

a. The relevant Works package applicable to Starr Gate (Works 19A/19B) remains too wide, and includes:

(a) creation of and improvement of temporary access to the highway; and

(b) temporary works to visibility splays.

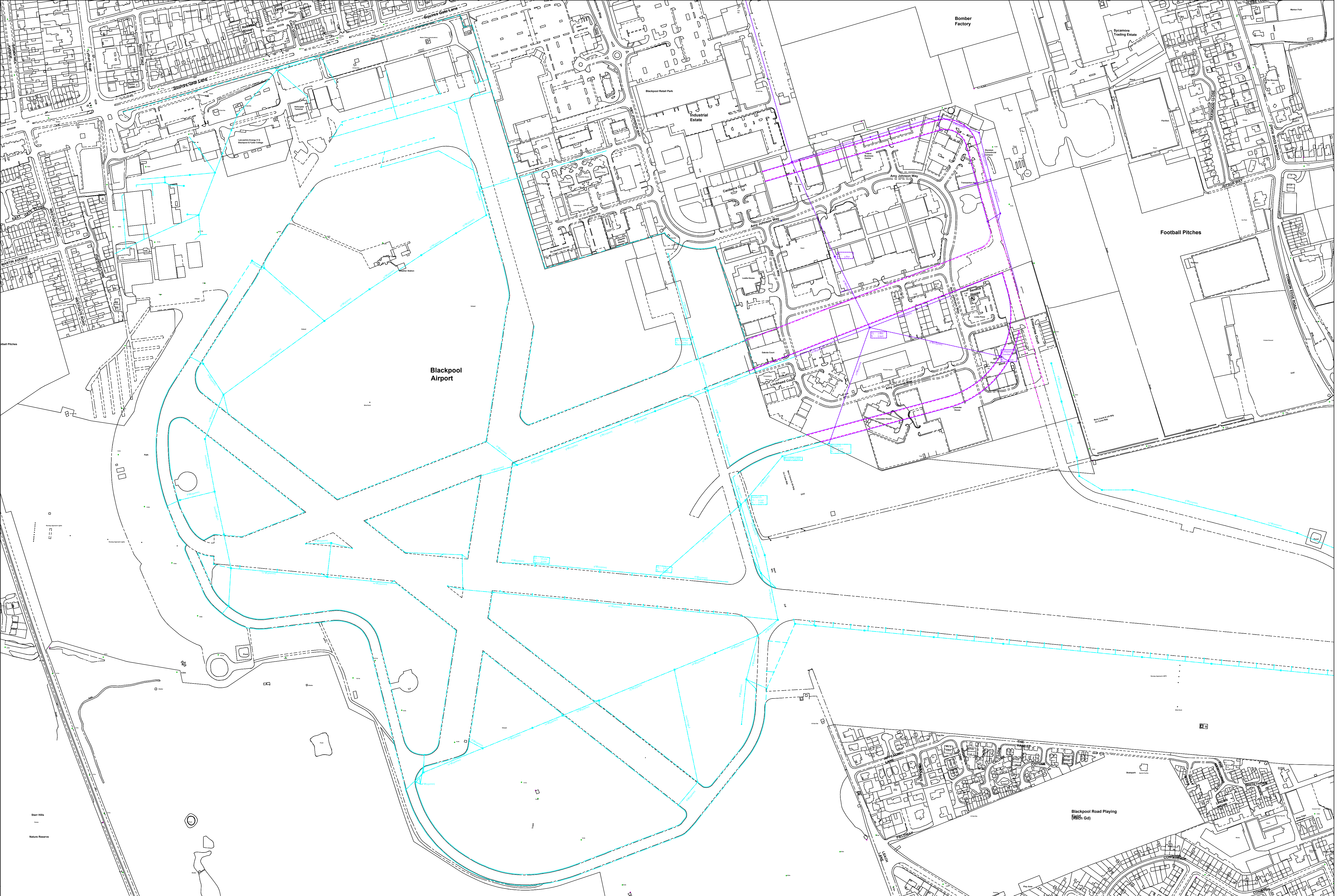
b. No justification has been given for the exclusionary possessory rights sought.

37. BBC does not oppose the proposed use of Starr Gate as described in the oCTMP.

The Council's priorities are (1) ensuring that the users of the Starr Gate are not prevented from using the accessway by the proposed development, and (2) no impediment to traffic accessing the Blackpool Promenade from Squires Gate Lane, via the Starr Gate intersection. As currently drafted, the dDCO enables the temporary closure of Starr Gate, both down the private road and slipway, and into the public highway at Starr Gate / Squires Gate Lane, which would impact the heavy flow of traffic down the Promenade. The associated tourism impacts of this have been noted in the Tourism section above and the separate note submitted at Deadline 4.

38. Regarding the cycle route which relies on Starr Gate access being open, BBC welcomes the amendments to the DCO which have been shared by the Applicants whereby these routes are no longer identified as being impacted by the proposed development. However, the temporary possessory (and therefore exclusionary) rights over Starr Gate detailed above do create a residual risk that in practice the rights of way /cycle route access may still be impeded. BBC notes that this supports its position that the rights sought do not reflect the proposed use.

Appendix 1 – Blackpool Airport Drainage Infrastructure



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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

**Outline Employment and Skills Plan – Blackpool Council Comments
Examination Deadline 4 Submission**



August 2025

1. The Outline Employment and Skills Plan ('OESP') (September 2024) prepared by the applicants outlines early principles for how the offshore wind transmission assets will support employment and skills in the region. Blackpool Council as an affected authority has a keen interest in regional workforce development, STEM promotion, and inclusion agendas.
2. Blackpool Council supports the position that targeted interventions such as apprenticeships, pre-employment programmes, and outreach should be prioritised in Fylde, South Ribble and Preston, with wider STEM and supply chain benefit across the region.
3. The OESP currently lacks project-specific employment or training output expectations. Based on offshore wind norms, Blackpool Council would recommend the following thresholds:

Category	Minimum threshold
Job creation	1 FTE per £1–1.5 million of project value (est. 200–300 jobs), with 30–50% local labour share
Apprenticeships	1 per £5–10 million invested (target 30–50 apprentices)
Work experience	50+ placements across impacted districts
STEM outreach	20+ school/college sessions, focused on directly impacted areas
Local supply chain spend	Minimum 30% of Tier 2/3 contracts awarded to North West SMEs
Inclusion	10% of job/apprenticeship outcomes for NEETs, long-term unemployed or underrepresented groups
Monitoring	Quarterly reporting of local labour, diversity, skills, and spend outcomes

4. Blackpool Council considers that these thresholds should be secured through the DCO or by separate legal agreement, and monitored by a named delivery body. The Council is concerned that the OESP at section 1.9.1.3 commits to evaluation but lacks specifics. Quarterly social value monitoring reports should be required to be shared with all impacted Councils. These reports should cover job and apprenticeship starts (with postcode tracking); diversity data; supply spend breakdown (regional and national); and outputs against agreed Key Performance Indicators.
5. The submitted OESP refers to future engagement at section 1.6.2.1, but lacks governance proposals. Blackpool Council considers that the Blackpool, Fylde and Wyre Economic Prosperity Board (EPB) be identified as the appropriate entity to steer development and monitor implementation of the detailed plan. The EPB is a well-established, constituted group under the Local Government Act 1972, created to deliver economic development and for monitoring purposes across the Fylde peninsula. Blackpool and Fylde Councils are both parties to this Board and other members can be co-opted as required.
6. Blackpool Council is concerned that, whilst a range of procurement-driven delivery initiatives are set out in the OESP at section 1.8, table 1.4, these are non-binding. The Council considers that these identified initiatives be embedded as commitments and should include minimum apprenticeship numbers; requirement to use local colleges/training providers; and engagement with DWP, Jobcentre Plus, and FE partners.
7. The Council notes that appendices A and B showcase strong case studies from other developers (namely BP and Flotation Energy), such as Energising Futures, Career Ready, X-

Academy and targeted internships. The Council considers that at least two of these best-practice initiatives be replicated locally with confirmed delivery partners, timeframes and targets.

Project: 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

Title: Tourism Impacts on the Borough of Blackpool – Additional Comments for Input into Revised Tourism Assessment

Date: Examination Deadline 4 Submission
05th August 2025

The potential impact of this proposal on tourism is a significant concern for Blackpool Council.

Blackpool, to its core, is a tourist town. In 2023 it welcomed 21.5m visitors generating some £2bn to the local economy. The Spatial Portrait of Blackpool as set out in the Local Plan Part 1: Core Strategy opens with the observation that Blackpool is England's largest and most popular seaside resort, attracting more than 10 million visitors annually. This document was published in 2016 meaning that, in less than a decade, visitor numbers have doubled.

This is testament to the huge amounts of public and private investment that have been devoted into regenerating and growing the resort, and improving public perceptions of Blackpool as a high-quality, year-round destination meeting modern visitor expectations.

Blackpool accounts for nearly a third of Lancashire's total tourism economy, and nearly a fifth of Blackpool residents are employed in tourism and tourism-related industries.

The Council has previously raised clear concerns that the applicant's submissions in respect of tourism impact have been too broad in scope, and have therefore significantly under-estimated the importance of tourism to the Blackpool economy. The applicant's commitment to submission of a revised and more tightly focused appraisal at Deadline 4 is therefore welcomed.

Tourism is highly reliant upon positive public perception. The figures quoted above from 2023 equate to a spend of just £93 per person, illustrating the importance of volume in terms of visitor numbers to Blackpool's success. Ease of access is an inherent aspect of the desirability of a destination. Starr Gate is a gateway to the Promenade, which is the backbone of the resort's tourist economy. Access restrictions or traffic delays caused at Starr Gate would impact upon the entire Promenade and, were it to become known that there were significant delays in accessing Blackpool's attractions, visitor numbers would drop dramatically. Should traffic be displaced further north, there are also concerns that some attractions and significant areas of parking would effectively be by-passed, leading to a reduction in visitor numbers to those sites.

Blackpool Council is firmly of the view that the revised tourism assessment must consider impact upon the full length of Blackpool Promenade up to Red Bank Road in the north. This stretch of the Promenade contains Blackpool's key tourist attractions including Blackpool Tower; North, Central and South Piers; the Town Centre; the Pleasure Beach amusement park; the Sandcastle Waterworld; and the Golden Mile which comprises a mix of leisure uses. The Promenade up to Red Bank Road is also host to a number of key events which draw large numbers of visitors including the Blackpool Airshow; Illuminations Switch-On; Ride the Lights; the Illuminations themselves, LightPool, the World Firework Championships, and Christmas by the Sea.

The Blackpool Illuminations were developed as a mechanism to extend the traditional holiday season. They extend from Red Bank Road in the north to Starr Gate in the south. All traffic travelling the full length of the display will therefore have to pass through Starr Gate.

Historically they ran from August Bank Holiday to the October half-term break. In more recent years the display has been retained until the New Year and has been complemented by the Christmas by the Sea event. The Council has traffic count data from 2023 and 2024 and is happy to share this information with the applicant.

The information shows that New South Promenade carries some 3.2 million vehicles annually. In both years, the peak month for vehicle numbers was October (c. 300,000). It is pertinent to note that traffic is spread far more evenly than would be typically expected over the evening period and remains heavy outside of the traditional PM peak, with 8pm traffic levels in October 60% higher than in May. This statistic takes on even greater significance when it is noted that local traffic generally avoids use of the Promenade during the Illuminations period, and that traffic during peak times can be very slow-moving, thereby limiting the number of vehicles that can pass a counter within the monitoring period. This clearly demonstrates that Promenade based events are effective in extending the visitor season and that they, and ease of access to them, are therefore crucial to the visitor economy.

In summary, the Council remains extremely concerned that the land rights and powers over Starr Gate, as they are currently expressed within the dDCO, have the potential to cause significant travel delays in accessing Blackpool Promenade, and consequently a significant and unacceptable social and economic impact upon the success of the resort as a tourist destination. As above, the Council welcomes the applicant's intention to submit revised information at Deadline 4 but reserves the right to maintain its position in the event that its concerns cannot be adequately resolved.

**THE MORGAN OFFSHORE WIND PROJECT AND MORECAMBE OFFSHORE
WINDFARM: TRANSMISSION ASSETS ORDER (DRAFT)**

ADVICE

1. I have been asked to advise Blackpool Borough Council (“the Council”) in respect of a matter concerning the powers sought to be taken through an application for a development consent order, namely the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm: Transmission Assets Order (“the draft DCO”). The application for that order is presently at examination.
2. I am asked to consider the powers that are sought through the draft DCO as these affect land owned, in part, by the Council at Starr Gate and Squires Gate Lane, Blackpool. This land is identified as plots 02-007, 02-008, 02-009, 02-010, 02-011 and 02-012 on the relevant land reference plans and as referred to in the book of reference which accompany the draft DCO. Part of the land included in the above plots is public highway and part of the land comprises a private road and boat ramp/slipway. By the draft DCO, those parcels are included in Schedules 7A and 7B and thus are plots over which a power to take “temporary possession” is sought, pursuant to article 29 of the draft DCO. Article 29 of the draft DCO sets out what may be undertaken on land over which temporary possession is taken. The purpose for which temporary possession of those plots may be taken is to provide “access to St Annes beach to facilitate construction of ... landfall works” for projects A and B. The promoters of the draft DCO have confirmed to the Council’s lawyers by email of 5 August 2025 that no works and no extinguishment of highway rights are required or proposed within those plots. The DCO is to be sought to be modified accordingly. The promoters have confirmed also to the Council (by email) that Starr Gate will be used “in a very limited way for access by light vehicles and for boat launches”.
3. The land at Starr Gate, which includes the plots referred to above, comprises an access from the A584 to the beach, and includes an access to the Blackpool tram

depot. Starr Gate is used also by inter alia the RNLI, HM Coast Guard and Fire and Rescue services as well as by a range of recreational users to access the beach, the boat ramp/slipway and to access the angling/sailing clubs located on either side of Starr Gate.

4. The purpose for which the plots at Starr Gate are intended to be used as part of the project are further explained in the Outline Construction Traffic Management Plan (5 June 2025, rev. F02). At para.1.10.6 of that Plan it is confirmed that parcels are required for the purpose of access to and use of the boat ramp 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.” (para.1.10.6.1). At para.1.10.6.2, it is confirmed that “access would be infrequent and only required by light vehicles (e.g. a 4x4 towing trailer). No HGVs would be permitted to access via Starr Gate”.
5. What follows immediately from the explanation given of the purposes intended for the Starr Gate plots is that the plots are required for access and use of the boat ramp/slipway only. As such, it is entirely unclear why powers of “temporary possession” are sought over these plots. As a matter of law, “temporary possession” would permit full and exclusive occupation of those plots albeit for a temporary period. However, all that appears to be required, consistent with the identified purpose, is a temporary right of access along Starr Gate and to use the boat ramp/slipway. The purpose for which the plots are required does not need “possession” of those plots. Moreover, the powers to take temporary possession of those plots would, on the face of it and without express limitation, allow the exclusion of other users of those plots for a temporary period as well as the undertaking of the range of activities set out in article 29 of the draft DCO. However, the purposes for which the plots are required, limited as it is to “infrequent” access by “light vehicles”, does not justify the taking of possession or the exclusion, by the taking of possession, of other users or indeed the exercise of powers conferred by article 29 of the draft DCO. It follows that the “purposes” for which the Starr Gate plots are required does not justify and is not consistent with a power to take possession, albeit temporarily, of those plots.

6. Although the power to take temporary possession of land does not amount, strictly, to compulsory acquisition thereby triggering the requirements of s.122 of the Planning Act 2008, to take temporary possession amounts in fact and in substance to a form of expropriation and should thus be considered by reference to the general policies of the Secretary of State concerning taking of land and rights by compulsion, including those set out in the Planning Act 2008 Guidance relates to procedures for compulsory acquisition of land of September 2013. This includes a requirement to demonstrate a compelling case in the public interest for the powers sought and for those powers to be proportionate to the purpose for which the powers are sought. Given that the powers sought exceed the purposes for which the Starr Gate plots are required, namely to provide “infrequent access” to and use of the boat ramp/slipway, there cannot, reasonably, be found to be a compelling case in the public interest for the extent of powers sought nor are the extent of those powers proportionate to the identified purposes. The potential for existing users to those plots to be excluded by the exercise of the powers sought further demonstrates the lack of proportionality and reasonableness of those powers and confirms the lack of a compelling case in the public interest for those powers to be given. As such, I do not consider that the DCO can reasonably or lawfully be granted in the terms sought, so far as it relates to the Starr Gate plots. In my view, at the very least, the DCO should be modified to remove the power to take temporary possession of the Starr Gate plots (with associated changes to exclude compulsory acquisitions of those plots should they remain within the Order Land). Moreover, given that no physical works or stopping up/diversion of the public highway or street comprising plots 02-009, 02-010, 02-011 and 02-012 are now proposed and the use of those plots is limited to “infrequent” use of access, it is unclear why any powers are sought now over those particular plots. It is difficult to see how reasonably such changes to the draft DCO would amount to a material amendment or otherwise be likely to be objectionable.



DOUGLAS EDWARDS KC
Francis Taylor Building,
Temple, London. EC4Y 7BY.
7 August 2025.