

Date: 22 September 2025

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Deadline 5 – South Ribble Borough Council Response to Examining Authority’s
Commentary and Questions on the Draft Development Consent Order

(Issued 8th September 2025)

Planning Inspectorate Ref: EN020028

Morgan and Morecambe Offshore Wind Farms Transmission Assets

This correspondence forms South Ribble Borough Council’s response to Examining Authority’s Commentary and Questions on the Draft Development Consent Order

Q1.3.1 Requirement 1 – Time Limits

a) The Examining Authority (ExA) notes the decision of the SoS to allow a 7-year commencement period in the Morgan Offshore Wind Project Generation Assets Order 2025 (“Morgan”). However, that project is entirely offshore and does not lead to and has not considered the potential onshore effects on local communities that could arise from the proposed development in this case (the transmission assets). Therefore, notwithstanding the Morgan decision, would a reduced commencement period of 5 years be justifiable for the transmission assets development taking into consideration the implications this may have including for landowners and local communities?

b) In the event that the SoS considers that the maximum time period between projects should be reduced by two years or more, what drafting implications would this have for the Development Consent Order (DCO) and any other certified documents?

c) The SoS, in granting the Morgan DCO removed the provision for an additional year to deal with any judicial review as he considered that any delay caused by a judicial review will not have a significant impact set against the 7-year overall period. Notwithstanding the matters raised above, the ExA suggests that Requirement 1(2) is similarly deleted

This Council considers that a five-year time limit would be more suitable than a seven-year limit. A shorter timescale would give comfort to residents of all relevant local authority areas that development would not be overly prolonged, and that a comprehensive and up to date assessment of the situation (e.g. ecology, flood risk etc) could be managed. It would also allow plenty of intervening time for judicial review without prejudicing the overall project. No other comments to note with regards to point b).

Q1.3.7 Requirement 6 – Provision of Landscaping

Should 6(2) of this requirement also include details of existing trees and hedgerows to be retained and those to be removed, given that such details are likely to be factors in the consideration of the acceptability of a proposed landscaping scheme

Whilst it is considered important to have as much detail as possible re: existing and proposed landscaping – and on this point engagement has been lacking in detail and extremely late to the table - it is also realistic to assume that over a lengthy construction period with a relatively long time limit (be that five or seven years), the situation on the ground will inevitably change. This Council would therefore request that full landscaping (existing and proposed) is provided to, and agreed with the local planning authorities prior to each phase of development, rather than an agreed approach for the entire scheme in advance of first commencement.

Q1.3.12 Requirement 14 – Construction Hours

a) 14(2) refers to works that may take place outside of the hours specified in subparagraph (1) for certain identified works. Should the last word of this opening sentence therefore say “comprising” rather than “including” as the later indicates that it is not a closed list?

b) Referring to the definition of “mobilisation activities” in 14(6) can the applicants explain what is meant by “general preparation and site maintenance work”? Why does this need to be included as part of the mobilisation activities bearing in mind that, whilst it would not include the operation of heavy machinery or generators, it might still possibly lead to issues of noise and disturbance when occurring in proximity to residential receptors between 6.00am and 7.00am?

c) For clarity, the ExA suggests adding similar wording from paragraph 1.6.1.6 of the outline Noise Management Plan [REP4-032] to this requirement.

d) Can the applicants explain what is meant by “classes” in 6(b)?

e) Whilst noting the amendment already made to Saturday working hours, would it be reasonable to push forward the start time of construction works on Saturdays from 0700 to 0800, given that there may generally be an expectation for less disturbance on Saturday mornings in comparison to weekday mornings?

f) Do the local authorities have any outstanding comments on this requirement, including any suggested alternative drafting should any concerns remain?

- Point a) – inclusion of the word ‘and’ at the end of point 14(2)(f) suggests that works must include all of the points a through to h, rather than comprising any or all of the points. If this word is removed or changed to ‘or’ either ‘comprising’ or ‘including’ would be acceptable to this Council.
- Points b and e) -this Council would like to repeat its insistence (as per previous written and relevant reps (REP1-097 and RR-2027 respectively), and SoCG to date) that commencement of work at 6am poses an unacceptable risk to the amenity of residents in all Council areas. Standard construction hours conditions are acknowledged as generally being an 8am start, yet this proposes not only an early start, but an additional hour prior to that which will inevitably result in noise, activity and disturbance, in addition to 24hr non-emergency working which at point 14(4) provides for notification of the local authority, but does not mandate a specific or reasonable timescale for that notification.
- Point c) – no objection
- Point d) – applicants’ response
- Point f) – no further comment

Q1.3.19 Requirement 25 – Onshore Collaboration

a) In the event of overlapping construction work programmes between the two projects (which is understood to be a possible scenario), do definitions of “sequential” and “concurrent” construction need to be provided or alternative wording to cover an overlapping scenario?

b) What progress has been made between the applicants and FBC regarding the Council’s concerns about collaboration at D4 [section 2.1 of REP4-134]?

c) Do the local authorities have any outstanding comments on the drafting of this requirement, including any suggested alternative drafting should concerns remain?

- Point a and c) – proposed wording appears sufficient. No other comments
- Point b) – FBC/applicants’ response

Q1.3.20 Requirement 26 – Biodiversity Benefit

The applicants explain in the Explanatory Memorandum [REP4-009] that this newly drafted requirement is being offered on a without prejudice basis subject to compulsory acquisition powers being granted for the biodiversity benefit areas.

a) Are the local authorities and parish councils’ content with the revised wording? If not, what potential drafting changes are suggested?

b) Can the applicants explain how the biodiversity benefits would be implemented for the proposed development and how this would be enforced?

- Point a) – wording is satisfactory
- Point b) – applicants’ response

Q.1.3.21 Suggested Additional Requirements

In response to ISH3.35 of the hearing action points [REP4-108], the applicants set out their response to several additional requirements that have been suggested by the local authorities

Are the Councils satisfied with the responses provided to each of these suggested requirements? If not please provide justification for your position and suggested drafting of any additional requirement that you still consider to be necessary?

No further comments

Q1.5.3 Comments on Drafting

Do any of the Councils have any remaining outstanding concerns regarding the content of Schedule 12?

This Council welcomes the grant of 10 weeks to discharge a requirement in whole or in part. Points 4(3) however of Schedule 12 which states that '*where the consultee requires further information they must notify the discharging authority in writing specifying the further information required within 10 days of receipt of the consultation*' is contrary to the standard 21-day allowance for review of discharging information. Resources in all organisations are at a critically low level, and it is very likely that regardless of this Order the suggested timescale would be unachievable. The same is true of point 4(5)

Point 6(b) refers to refund of fees if not determined within eight weeks, and should be amended to ten weeks in line with point 3(1)

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

Kind regards



Chief Planning Officer / Head of Planning and Enforcement