

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 Examining
Authority's written questions and requests for information
(ExQ2) issued on 8 September 2025**

Examination Deadline 5 Submission

September 2025



ExQ2	Question to:	Question:	
1. General and cross-topic questions			
1.1 General and cross-topic matters			
Q2:1.1.1	The applicants and local authorities	<p>Co-ordination and collaboration</p> <p>The applicants response to ExQ1.1.7 [REP3-056] explains that whilst flexibility is required to allow each of the projects to construct independently on each other, opportunities may emerge for further coordination depending on each project achieving Financial Investment Decision and following detailed design. Notwithstanding the measures introduced such as Requirement 25 (Onshore collaboration) in the draft Development Consent Order (dDCO), what further specific drafting can be incorporated into the relevant control and management documents and the dDCO to ensure that full opportunities are taken for co-ordination and collaboration where such opportunities emerge, in the interests of reducing and minimising the potential effects of the proposed development upon communities and the environment?</p>	Whilst Blackpool Borough Council broadly supports the principle that full opportunities are taken for co-ordination and collaboration where possible, no further amendments to the DCO are proposed.
Q2:1.1.5	The applicants, local authorities and parish councils	<p>Outline Communications Plan</p> <p>An updated Outline Communications Plan has been submitted by the applicants at deadline 4 (D4) [REP4-029].</p> <ul style="list-style-type: none">a) Do the local authorities and parish councils have any comments and/or additional suggestions on the drafting of this plan?b) The updated version of the plan no longer includes reference to a 'local liaison committee, comprising relevant local representatives' that was included in paragraph 1.3.1.1 of the previous version of the plan. Can the applicants explain why this has been deleted?c) Do the local authorities and parish councils consider that the creation of a local liaison committee should be retained in the outline plan?	<p>Blackpool Borough Council is broadly content with the Outline Communications Plan, but seeks the following minor additions/amendments:</p> <ul style="list-style-type: none">1. The communications plan should also be consulted on/signed off by the relevant local authorities.2. Provision of an area staffed at least five days per week where local residents can visit, receive information, and ask questions to facilitate two-way communication.3. A commitment to provide regular updates to affect residents initial view is communications should be sent out fortnightly.

1.2 Site selection and alternatives			
Q2:1.2.2	The applicants and any interested party	<p>East Irish Sea Transmission Project</p> <p>The East Irish Sea Transmission Project Environmental Impact Assessment Scoping Report was submitted to the Planning Inspectorate in August 2025. This includes two possible grid connection routes options. Are there any matters of relevance arising from the information available in that Scoping Report for the consideration of site selection and alternatives of the Morgan and Morecambe Transmission application?</p>	Blackpool Borough Council does not have any comments in relation to the Application before this ExA and the East Irish Sea Transmission Project following BBC review of the East Irish Sea Transmission Project Scoping Report.
1.3 Cumulative effects, in-combination effects and interaction with other projects/infrastructure			
2. The draft Development Consent Order (dDCO)			
BBC has combined its responses from the dDCO ExA Questions document [PD-012] into this document.			
Schedules 2A and 2B: Requirements			
Q1:3.7	The applicants and local authorities	<p>Requirement 6 – Provision of landscaping</p> <p>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?</p>	<p>Blackpool Borough Council does not have any trees or hedgerows within its administrative area affected by the proposed development, and therefore has no concerns with this requirement.</p> <p>With respect to Landscaping, BBC has had it brought to their attention that there is a (partially funded) volunteer group carrying out works to enhance and maintain the</p>

			<p>sand dunes between St Anne's sea defences and Starr Gate, including plot [01-006] owned by Blackpool Council – BBC wishes to ensure the applicants and the ExA aware of this so that their work is not detrimentally affected by the construction of (and remedial work associated with) the proposed development.</p> <p>BBC respectfully requests that the applicants contact the group (if they have not already) and confirm the dune enhancement work is being considered in the detailed design and construction practiced for the proposed development.</p>
Q1:3.12	The applicants and local authorities as appropriate	<p>Requirement 14 – Construction hours</p> <p>a) 14(2) refers to works that may take place outside of the hours specified in sub-paragraph (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?</p> <p>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?</p> <p>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.</p> <p>d) Can the applicants explain what is meant by “classes” in 6(b)?</p>	<p>Blackpool Borough Council consider that the appropriate drafting of Requirement 14(2) should be ‘comprising’ to ensure clarity and certainty. Therefore BBC request that Requirement 14(2) specifies the works that may take place outside of the hours in sub-paragraph (1). Consequently the last word of this opening sentence should state “comprising” rather than “including” to reference a closed certain list?</p>
Q1:3.19	The applicants and local authorities	<p>Requirement 25 – Onshore collaboration</p> <p>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?</p> <p>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]?</p> <p>c) Do the local authorities have any outstanding comments on the drafting of this requirement, including any suggested alternative drafting should concerns remain?</p>	<p>Blackpool Borough Council broadly supports further controls to ensure coordination and collaboration is taken advantage of where possible, but does not propose further amendments.</p>
Q1:3.21	Local authorities	<p>Suggested additional requirements</p> <p>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.</p> <p>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?</p>	<p>Further to discussions with the Applicant, Blackpool Borough Council is no longer seeking an Unexploded Ordnances Survey through this examination process. BBC's only remaining comments on the construction working hours are set out in response to Q1:3.12 above.</p>
Schedule 12: Approval of matters specified in requirements			
Q1:5.3	Local authorities	<p>Comments on drafting</p> <p>Do any of the Councils have any remaining outstanding concerns regarding the content of Schedule 12?</p>	<p>Blackpool Borough Council has no remaining outstanding concerns with the drafting of Schedule 12 in the dDCO.</p>
3. Air quality			

The Examining Authority has no additional questions on air quality at this time.			
4. Aviation and radar			
5. Compulsory acquisition, temporary possession and other land or rights considerations			
Q2:5.1.4	Blackpool Borough Council (BBC)	<p>Airport agreement</p> <p>The cooperation agreement with the applicants relating to Blackpool Airport did not extend to land rights [REP4-129] but was limited to operational impacts. What is the current position concerning the negotiation with BBC for the cable rights and restrictive covenants at Blackpool airport as set out in section 1.10.1.5. of the SoR [REP4-016]?</p>	<p>Proposed Works within the Airport Boundary</p> <p><i>Current Position</i></p> <p>The current position is that the Council is willing to agree appropriate and reasonable terms to enable the Applicants' proposed works and acquisition of permanent possessory rights for the installation of cables which traverse the Airport/ Council land to the south.</p> <p>However the Airport/ Council are yet to receive any financial offers or appropriate Heads of Terms. The Applicants undertook, at a meeting with the Airport/ Council team on 28 August 2025, to make financial offers and propose appropriate and reasonable Heads of Terms by 11 September 2025 but these are still awaited.</p> <p>Whilst the Applicants have previously referred to the provision of Heads of Terms, the terms thus far provided to the Airport/Council are generic, do not include any specific sensible financial offers and take no account of the matters outlined below. They are therefore not fit for purpose which has been relayed to the Applicants by the Council/ Airport team.</p> <p>As there are no agreed Heads of Terms, it is not possible to estimate when Land Agreements might be completed by the Parties. The timing is considered to be outside of the control of the Council/ Airport. Principally dependent upon the Applicants refining the design of their scheme to enable co-existence of the Council's Solar Farm which is an essential and intrinsic component of the Silicon Sands project as set out below.</p> <p>It is against this background that the Airport/ Council team requested a direct principal to principal meeting with the Applicants, which took place at the Council's offices on 28 August 2025. The Applicants committed, at that meeting to provide amended scheme designs that fully account for the Council's Solar Farm development by 11 September 2025 yet nothing has been received to date.</p> <p><i>Background/ Applicants Proposal</i></p> <p>The Applicants' Schemes propose the installation of 6 x Transition Jointing Bays and an unspecified number of Jointing Bays, together with 4 x 400 KV cables and 2 x 132 KV cables across the southern part of the Airport.</p> <p>The Applicants advised, in their presentation dated 29 November 2024 and in subsequent correspondence and representations, that they require permanent possessory rights of a strip of land above the cables at a 70m width, equating to a total area of 35.2 acres. Paragraph 1.3.14 of the Statement of Reasons (Document Ref:D2: APP-013) states that ""The cables will be buried underground in trenches with a typical depth of 1.8m to the bottom of the trench" and "The onshore export cable corridor is expected to have a maximum width of 100 m for both Morgan OWL and Morecambe OWL during construction except at complex crossings to allow up to six cable circuits to be installed (i.e. up to 4 for Morgan OWL, and up to 2 for Morecambe OWL). Once installed, the onshore export cables will occupy a corridor approximately 70 m wide for both Morgan OWL and Morecambe OWL (although this width may need to increase at complex crossings)." The Council understands that this means that 50.2 acres of land will be exclusively controlled by the Applicants during the construction works and 35.2 acres will be permanently sterilised.</p>

			<p>The effect of this is that neither the Airport nor the Council would be able to use, develop or allow any vegetation within the sterilisation strip, with the consequence that the entire area would be sterilised as it will have no future use or benefit to the Airport/Council. This would be fatal to the delivery of the Solar Farm and directly impact upon the Silicon Sands development. Whilst being the subject of discussions (i.e. the meeting dated 29 November 2024) since 2023, in light of which the Council/Airport had expected to have received revised proposals for approval, the Applicants have not formally moved from this position as set out in the SoR (D2: APP-013).</p> <p>Background/ Council's Solar Farm</p> <p>The Applicants were first aware of the Council's proposed Solar Farm since a meeting on 22 March 2023, and stated in their presentation dated 29 November 2024 that: "<i>Coexistence [is] considered achievable and Morgan & Morecambe support the solar scheme planned.</i>" Despite this confirmation, progress in respect of the principle of coexistence with a viable solar farm has been minimal despite the Council actively pressing for engagement by the Applicants.</p> <p>By way of background, the Council have long held aspirations to deliver a 20MW Solar Farm on land within the Airport boundary owned by the Airport/Council. The Solar Farm is an essential component of the Council's wider 'Silicon Sands' objective to create a digital hub centred initially on the Blackpool Airport Enterprise Zone (with aspirations to expand the industry into the Fylde region). The Silicon Sands hub is intended to capitalise on the North Atlantic loop telecommunications fibre link which runs through the Starr Gate access, providing high speed transatlantic connectivity of less than 0.64 milliseconds to New York. Silicon Sands has been put forward for AI Growth Zone status. If delivered to its full potential, the development may generate a cumulative GVA of £6.1bn and support circa. 6,069 jobs, with transformative potential for the economic prospects and competitiveness of one of the UK's most deprived areas. It is concerning that the Applicants have yet to acknowledge or seek to accommodate the importance of this scheme to the local economy and regeneration aspirations.</p> <p>The 20MW Solar Farm is proposed to be linked with a planned 50MW battery storage facility and 38MW of new grid connectivity to support the development of a series of small to medium scale data centres within the Enterprise Zone, to create a cluster of low carbon sustainable data centres utilising liquid immersion cooling technology to reduce power consumption and enable heat recapture to support a district heating system. The estimated initial capital investment is £80M. The Solar Farm is also of benefit to the continued viability of the Airport. The Airport will benefit in two ways - from the sale or rental of the BAPL land for the solar farm which will generate a capital / receipt/ revenue; and there may be a benefit from lower cost energy which will assist towards reduction of the airports high running costs. The delivery of these aspirations is at significant risk if the Applicants' scheme remains as currently proposed within the draft DCO.</p>
Q2.5.1.16	BBC	<p>Negotiations with Council</p> <p>Please provide an update on and an outline of the "number of issues in dispute". Is it expected that these will be resolved during the examination?</p>	<p>The response on behalf of the Council is as follows, with the Applicant's proposed works in respect of land in Council's ownership considered in four specific areas:</p> <ol style="list-style-type: none">1. The installation of Transition Jointing Bays, Jointing Bays, 4 x 400KV and 2 x 132 KV cables within the boundary of Blackpool Airport.2. Access rights to the beach in the vicinity of the Starr Gate Tramway Station.

			<p>3. Temporary occupation of the beach.</p> <p>4. Installation of 4 x 400KV and 2 x 132 KV cables under the beach connecting the Airport land with the foreshore (owned by the Crown).</p> <p>Point 1 being the installation of Transition Jointing Bays, Jointing Bays, 4 x 400KV and 2 x 132 KV cables within the boundary of Blackpool Airport is addressed above Q2:5.1.4, with points 2 – 4 addressed in turn below.</p> <p>Although firstly a more generic point, whilst the Applicants have referred to the provision of Heads of Terms, such Heads of Terms provided to the Council/ Airport team are generic, do not include any definitive financial offers and take no account of the matters outlined in respect of the circumstances of each particular and relevant area. Therefore the Heads of Terms provided are considered to not be fit for purpose, which has been relayed to the Applicants by the Council/ Airport team.</p> <p>As there are no agreed Heads of Terms, it is not possible to estimate when Land Agreements might be completed by the Parties. Discussions are currently outside of the control of the Council and dependent upon the Applicants redesign of their works schemes and provision of fit for purpose Heads of Terms.</p> <p>For clarity, the Council have been clear that they require full completion of Heads of Terms prior to close of Examination. Unfortunately, at the time of submission, this does not appear likely bearing in mind the lack of confirmation in respect of design issues and the absence of any definitive financial and practical offers or Heads of Terms that are relevant to the particular circumstances of the Council's land.</p> <p>2. Starr Gate Access</p> <p>Blackpool Borough Council recognise the movement by the Applicant team since the beginning of the ExA Hearings. However, the Applicants' DCO proposes the acquisition of temporary rights over Plots 02-007 to 02-012. If granted as proposed, the Council may be unable to operate the Starr Gate Access tram depot, and public disruption may result for major events upon which the Council rely. In any event, the requested powers are excessive and disproportionate to the Applicants' proposed use set out in the oCTMP. Refer to Counsel opinion attached at Appendix 2.</p> <p>The Applicants have verbally proposed a Banksperson agreement in respect of the Starr Gate access whereby the Applicants would have the right for a Banksman to control traffic accessing the beach as and when access is required in connection with the scheme to manage potential traffic conflicts. The Council welcome the suggestion, and understand that this is agreed in principle by the Applicants but, whilst the Applicants undertook to provide draft terms on this basis by 11 September 2025 for review by the Council, they are still awaited.</p> <p>3 & 4. Temporary Use of the Beach and Cable Rights under the Beach</p> <p>The Applicants' DCO proposes the acquisition of temporary and possessory rights particularly over Plot 01-006, for the purpose of cable construction and maintenance rights.</p> <p>The Council is willing to agree appropriate and reasonable terms to enable the Applicants' temporary use of the beach as a laydown area and acquisition of permanent possessory rights for the installation and maintenance of cables which traverse under St Annes beach.</p> <p>However the Council are yet to receive any financial offers and appropriate reasonable Heads of Terms. The Applicants undertook, at the meeting with the</p>
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			Council on 28 August 2025 to make a financial offer and propose appropriate and reasonable Heads of Terms by 11 September 2025 but these are still awaited.
6. Ecology, biodiversity and nature conservation (on-shore)			
6.1 Ecology and nature conservation			
6.2 Biodiversity net gain (BNG)			
Q2:6.2.4	The applicants (a-c), Fylde Borough Council (FBC), Blackpool Borough Council (BBC), Lancashire County Council (LCC) and any other interested parties (IPs) (b)	Biodiversity and bird strike risks NPS EN-1 4.6.12 says that when delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use. a) If SoS was minded to agree with BAE Systems position, can the applicant comment on the quoted paragraph 4.6.12 of NPS EN-1? b) If SoS was minded to agree with BAE Systems position and on-site delivery of BNG was therefore not possible, could the councils and the applicants reach an agreement on alternatives that would align with the NPS EN-1? c) If SoS was minded to agree with BAE Systems position, will the applicants consider submitting a without prejudice strategy for off-site delivery of BNG to satisfy the NPS EN-1, section 4.6 with additional focus on 4.6.1?	Blackpool Borough Council currently has no inhouse ecology expertise, and as delivery of alternative BNG is most likely to be located outside of its administrative area, the Council considers there would be limited value in its involvement or consultation. Therefore BBC defer to Fylde BC as the appropriate authority. If the proposed BNG is of relevance to Blackpool and its constituency, it is of course willing to engage with the Applicants (insofar as it has the technical capability) to agree alternative BNG.
7. Environmental matters (off-shore)			
7.1 Physical processes			
7.2 Benthic ecology			
7.3 Fish and shellfish ecology			
7.4 Marine mammals			
8. Geology, hydrogeology and ground conditions			
9. Habitats Regulations Assessment (HRA)			
9.1 General			
9.2 Screening			
9.3 ISAA (Information to Support Appropriate Assessment)			
10. Hydrology and flood risk			
11. Historic environment			
12. Land use and recreation			
13. Landscape and visual			

14. Noise and vibration			
15. Socio-economic effects			
Q2:15.1.2	Blackpool Borough Council (BBC) and Fylde Borough Council (FBC)	Approving authority Please provide an update on discussions between the Councils as to which one will be the single approving authority for the OESP under Requirement 19 of the dDCO [REP4-007].	The Councils have discussed the matter and it is agreed Fylde Borough Council will be the approving authority.
Q2:15.1.8	FBC and BBC	Councils' further comments Both Councils made further representations at D4 but at that stage, there was an expectation that a detailed report on the impacts at a local level on the tourist trade would be provided. This has not occurred. Do the councils wish to add anything further notwithstanding that no further evidence has been provided by the applicants?	<p>On 8 September 2025, Blackpool Borough Council provided further information to the Applicants to assist their assessment of impact on the tourist trade, which is appended to this document at Appendix 1:</p> <ol style="list-style-type: none">1. BBC note on Tourism dated 5 August 2025;2. BBC comments on Tourism Impacts Assessment; and3. ATC data for the South Promenade for 2023 and 2024. <p>BBC are disappointed that the final assessment has not been provided to date and request an assurance that it will be provided well before the next ExA Hearings.</p>
16. Transportation and traffic			
Q2:16.1.1	The applicants, Blackpool Borough Council (BBC), Fylde Borough Council (FBC)	Draft Development Consent Order (dDCO), Article 14 Access to Works and Schedules 6A and 6B Given the proposed limited use of the Starr Gate access as set out in paragraphs 1.12.6.1 to 1.12.6.5 of [REP4-056] should the full provisions of Article 14 of [REP4-007] apply? Is Starr Gate the responsibility of BBC as highway authority or FBC as indicated by Schedules 6A and 6B of [REP4-007]?	<p>Blackpool Borough Council consider that the full extent of Article 14 should not apply to the Starr Gate Access.</p> <p>The Starr Gate access is the responsibility of BBC as local highway authority. BBC requests that the Applicant update schedule 6A/6B to reflect this if it has not already been picked up as part of ongoing reviews and discussions.</p>
Q2:16.1.2	The applicants, Lancashire County Council (LCC), BBC, Natural England (NE)	dDCO, Requirement 10 Highway accesses Should the Highway Access Management Plan (HAMP) be approved directly by the relevant highway authority in the same way as the Construction Traffic Management Plan (CTMP) (Requirement 9) rather than by "the relevant planning authority in consultation with the relevant highway authority" as stated in the latest version of the dDCO [REP4-007]?	Blackpool Borough Council confirm that Requirement 10 should refer to the relevant highway authority.
Q2:16.1.15	BBC	Starr Gate Is BBC content with the proposed usage of Starr Gate Access by the applicants to launch vessels from the existing boat ramp to facilitate construction activities at landfall and the associated safety measures proposed, set out in paragraphs 1.12.6.1 to 1.12.6.5 of [REP4-056]?	<p>Blackpool Borough Council is content with the proposed usage of the Starr Gate Access. BBC understand that such intended usage by the Applicants is:</p> <ol style="list-style-type: none">1. Access would be infrequent and only required by light vehicles (e.g. a 4x4 towing a trailer); and2. Requirement for drivers to travel with a banks person to manage traffic and non-motorised users while the applicants are using the ramp. <p>BBC's remaining concerns relate to the possible exclusive temporary possessory rights the dDCO grants the applicants as set out above. BBC note that the possible exclusive temporary possessory rights set out in the dDCO Starr Gate Access remain under discussion with the Applicants. Discussions have been positive thus far through the ExA Hearings and are ongoing with the Applicants with an update expected at the Hearings.</p>
17. Other matters			
17.1 Green Belt			
17.2 Commercial fisheries			
17.3 Climate change			

Appendix 1 – Tourism attachments

Tourism Impact Assessment – Blackpool Council comments

1. Definition of Study Area

The inclusion of South Ribble within the study area risks diluting potential tourism impacts, as it does not share the same visitor economy characteristics as Blackpool, Lytham and St Annes.

A tiered approach that prioritises core tourism destinations, rather than treating all administrative districts equally, is recommended.

2. Construction-Phase Impacts

The assessment underrepresents construction-related effects, particularly:

- Traffic congestion, disruption and diversions during peak visitor periods:
 - Key routes for consideration being:
 - Squires Gate Lane
 - Starr Gate
 - Promenade (from Starr Gate to Red Bank Road)
 - Key events for consideration being:
 - Blackpool Air Show
 - Illuminations switch-on
 - Ride the Lights
 - The Illuminations
 - LightPool
 - World Firework Championships
 - Christmas by the Sea
 - Showzam
 - St. Annes Kite Festival
- Visitor impact
 - Potential for notably different impacts on day and staying visitors
 - An assessment of the likely difference in spending and behavioural patterns between tourists/holiday-makers and construction workers
 - Potential for availability and price-racking issues resulting from construction worker booking-out of accommodation
 - Potential for a change in character of holiday accommodation areas (loss of tourist atmosphere) or specific properties
- Reputational damage, given the extent to which tourism is driven by visitor perceptions, and the potential for customers to be put off from travelling to the resort due to anticipated delays and disruption.

3. Operational Effects

Accepted that operational impacts on tourism in Blackpool are likely to be very limited.

4. Over-Reliance on Policy Compliance

Although regulatory compliance is referenced, this alone does not address the risks to a perception-led sector such as tourism. Visitor decision-making can be shaped by community sentiment and media narratives even in the absence of measurable environmental effects.

5. Cumulative Impacts

Cumulative pressures from other infrastructure projects and transport congestion are not sufficiently assessed. The combination of these factors may have a more material impact than the isolated effects described in the report.

6. Local Sensitivities and Seasonality

Although Blackpool is working hard to establish itself as a year-round resort, its tourism economy continues to display clear seasonality and peaks around school holidays and specific events and attractions. Disruption during these times and the peak summer months could have disproportionate impacts on businesses and employment. The assessment does not fully address this temporal sensitivity, nor the reputational risks associated with negative visitor perceptions.

Conclusion and Recommendation

In its current form, the assessment underestimates the potential impacts on tourism.

A revised Tourism Impact Assessment should:

- Focus on the core tourism centres with a dedicated assessment of Blackpool
- Provide a balanced appraisal of both positive and negative construction impacts
- Incorporate qualitative visitor perception studies
- Explicitly address cumulative and seasonal factors

Appendices

- 1 – Note on Tourism Assessment submitted to the ExA 05/08/25
- 2 – Traffic data from 2023
- 3 – Traffic data from 2024

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.

2023 ATC data**Site New South Promenade**

Month	Southbound	Northbound	Total	AADT
January	129802	121468	251270	8105
February	130275	121203	251478	8981
March	147331	137650	284981	9193
April	143316	132439	275755	9192
May	157181	144105	301286	9719
June	146947	135140	282087	9403
July	144834	133037	277871	8964
August	149333	138143	287476	9273
September	156264	139505	295769	9859
October	160884	144046	304930	9836
November	146084	130064	276148	9205
December	141533	128215	269748	8702
Total	1753784	1605015	3358799	8760

2024 ATC data

Site New South Promenade

Month	Southbound	Northbound	Total	AADT
January	129002	118861	247863	7996
February	121108	112985	234093	8670
March	143524	134768	278292	8977
April	140411	130866	271277	9043
May	147342	138213	285555	9211
June	137987	130330	268317	8944
July	141080	134826	275906	8900
August	137947	130749	268696	8668
September	146698	133894	280592	9353
October	154122	138591	292713	9442
November	140872	126904	267776	8926
December	134504	123209	257713	8313
Total	1674597	1554196	3228793	8548

Only 27 days in the month due to a software change over

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

FURTHER ADVICE

1. On 7 August 2025 I provided written advice to Blackpool Borough Council (“the Council”) in respect of the above application for a development consent order (“DCO”). My advice concerned the proposal, as set out in the draft DCO, for a power to take temporary possession of Starr Gate Access Blackpool. I understand that that written advice has been given to the examining authority and to representatives of the applicant.
2. The applicant for the DCO has responded to my advice and, following further engagement with the Council, it has proposed further modifications to the draft DCO. I have been asked to consider that response and the proposed modifications to the draft DCO.
3. With the proposed modifications sought to be made to the draft DCO, it is clear that the applicant no longer seeks to carry out any physical works to Starr Gate Access or to restrict public rights over Starr Gate Access; the proposed modification to the description of works 19A and 19B confirm this and the applicant has already proposed a modification to the draft DCO to exclude Starr Gate Access from Schedules 3A and 3B, 4A and 4B and 5A and 5B. These changes are all consistent with Schedules 7A and 7B, which provide that plots 02-007, 02-008, 02-009, 02-010, 02-011 and 02-012 are requires only for access to St. Anne’s beach to facilitate construction of the Project A and Project B landfall works.
4. However, what remains also clear is that the extent of access that is required is limited in extent. This follows from what is set out in various of the supporting documents to the draft DCO and from the draft CTMP, in particular. It appears that the Applicant does not consider it necessary to exclude other users or uses of Starr Gate Access and to do so is not the applicant’s intention. However, oddly, the applicant continues to seek power to take temporary possession of Starr Gate

Access. The inclusion of Starr Gate Access within the Schedules 7A and 7B and thus within the scope of Art.29 of the draft DCO makes this clear. As such, in principle, the applicant is still seeking through the DCO power to take temporary possession of Starr Gate Access and to exercise over it the powers conferred by Art.29 even though it candidly accepts that it does not need those powers. On the applicant's own case, a right to use Starr Gate Access to access occasionally the boat ramp and beach is all that is required and this does not require displacement of other users or uses.

5. The attempt by the applicant in its response to my written advice to suggest that the DCO does not in fact or law confer a power to take temporary possession of Starr Gate Access is not credible. It may well be the case that works comprising Project A and Project B as provided for in the draft DCO do not include consent for any physical works to Starr Gate Access. However, that does not itself provide a limit on the exercise over Starr Gate Access of the power to take temporary possession pursuant to Article 29. Article 29, which may be exercised "in connection with the carrying out of" Project A and Project B. As such, even though the DCO does not make provision for works at Starr Gate Access, temporary possession may still be taken of it "in connection with" works which form part of the DCO.
6. Article 24(5),(6) likewise do not limit the exercise of the power to take temporary possession but are consequential on temporary possession being taken and its purposes. Article 24(5),(6) leave it open to those implementing the DCO to suspend or to render unenforceable private rights over Starr Gate Access if continuation of those rights is not inconsistent with the purpose of temporary possession. The issue in respect of Starr Gate Access is that, by the applicant's own admission, there is no necessity for temporary possession of it to be taken at all
7. Moreover, the CTMP is, at this stage, a draft document. The final form of the CTMP will emerge after the DCO is made. That the draft (or final) CTMP may make clear that only limited use of Starr Gate Access is intended does not limit the scope of Article 29.

8. Taking a step back, the recent responses from the applicant, including the terms of the draft CTMP in so far as it addresses Starr Gate Access serves to reinforce the conclusion that the taking of temporary possession of Starr Gate Access is not required for the delivery of Project A or Project B and thus that the unqualified inclusion of Starr Gate Access within the scope of Article 29 is not justified.
9. The statement at paragraph 9.1 of the applicant's response to my written advice that "in relation to Starr Gate Access, the requirements and other provisions of the draft DCO clearly limit and restrict the authorised works at Starr Gate Access to temporary access by light vehicles only, meaning that the Applicant would not have the powers to exercise full and exclusive occupation of the Starr Gate plots" is not in my view legally correct. The other provisions of the draft DCO do not have the limiting effect on article 29 that the applicant claims.
10. The matter is entirely straightforwardly resolved by the inclusion by way of modification of the draft DCO of a term which makes clear that the use of Starr Gate Access in connection with Project A and Project B must not displace others with a right to use Starr Gate Access for access and otherwise.
11. Absent either of those steps, then for the DCO to be made with the powers over Starr Gate Access which are sought would be unlawful, as I have previously advised.

DOUGLAS EDWARDS K
Francis Taylor Building,
Temple, London EC4Y 7BY.

22 September 2025.