

Department of Energy Security & Net Zero
3-8 Whitehall Place
London
SW1A 2AW

Name:	FAO David Wagstaff
Department:	Energy Infrastructure Planning Delivery
Planning Inspectorate Reference:	EN010136
Applicant's Reference:	S_RfI3_01 (F01)

7 August 2025

Subject: Morgan Offshore Wind Project: Generation Assets – Application for Development Consent Order, Planning Inspectorate reference EN010136

Dear Sir

Morgan Offshore Wind Limited (the Applicant) writes in response to the Secretary of State's letter dated 25 July 2025 requesting comment (Consultation 3) from the Applicant and interested parties on the letter dated 19 June 2025 and requests an update on the status of the final agreements.

Please find attached our response to the submissions from interested parties.

Corporate Structure

As of 4 August 2025 Morgan Offshore Wind Limited is 50% owned by JERA Nex bp Limited (which is 50% owned by JERA Nex Limited and 50% owned by BP Gamma Holdings Limited); and 50% owned by EnBW Energie Baden-Württemberg AG (EnBW).

JERA Nex bp combines JERA Nex Limited and bp's offshore wind portfolios and project management expertise to create a new standalone, equally owned joint venture. The formation of JERA Nex bp Limited is intended to accelerate development from the companies' combined 13 GW offshore wind pipeline.

Further detail, including the revised Morgan Offshore Wind Limited company structure and the most recent financial statements for the companies within JERA Nex bp limited has been included in the enclosed update to the Funding Statement [previously REP4-026].

For the avoidance of doubt, the Applicant's position remains that there is no requirement to submit a funding statement as part of this application, as the relevant provision of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (reg. 5(2)(h)) only apply where the draft development consent order includes powers of compulsory acquisition of land. The Applicant submitted the original funding statement in response to a request by the Examining Authority. No interested party made any representations on the funding statement, or adequacy of funding, during the Examination. Insofar as the Funding Statement is considered relevant, the Applicant considers that this is a matter for the Secretary of State and does not need to be consulted upon.

Yours faithfully,



Peter Gaches

Morgan Consents Lead

**Morgan Offshore
Wind Farm**

Security classification: Public



**THE APPLICANT’S RESPONSE TO THE SECRETARY OF STATE’S
LETTER DATED 25 JULY 2025
CONSULTATION 3**

Latest revision						
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Submission to the Secretary of State	Morgan Offshore Wind Limited	07.08.2025	Morgan Offshore Wind Limited	07.08.2025	Morgan Offshore Wind Limited	07.08.2025
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1 Applicant's Submission in Response to the Secretary of State's Letter 25 July 2025

1.1 Introduction

- 1.1.1.1 Responses to the Secretary of State's letter (Consultation 1) requesting updates from the Applicant (Morgan Offshore Wind Limited) and interested parties were published on 3 July 2025.
- 1.1.1.2 On 25 July 2025, the Secretary of State published a letter (Consultation 3) requesting information from the Applicant and others. The Applicant's responses to the letter are provided in the following sections of this document:
- Isle of Man Steam Packet Company (Section 2)
 - Blackpool Airport (Section 3)
 - BAE Systems (Marine) Limited Walney Aerodrome (Section 4)
 - BAE Systems Operations Limited Warton Aerodrome (Section 5)
 - Defence Infrastructure Organisation (Section 6)
- 1.1.1.3 The Applicant notes that submissions were also made by the Marine Management Organisation on 1 August 2025 in response to the Secretary of State's letter dated 18 July 2025 (Consultation 2). The Applicant confirms for completeness that it has no comments on this submission.
- 1.1.1.4 The Applicant notes that a submission was also made by Mooir Vannin Offshore Wind Farm Limited (MVOWFL) on 1 August 2025. The Applicant has responded to that submission in Section 7 of this document.
- 1.1.1.5 The Applicant also notes the submission made by Natural Resources Wales (Advisory), which it has addressed in Section 8 of this document.

2 Isle of Man Steam Packet Company

- 2.1.1.1 Paragraph 4 of the Secretary of State's letter is in relation to commercial negotiations and agreements and is set out as follows:
- 4. The **Applicant** and Isle of Man Steam Packet Company should provide an update on the status of their Ferry Mitigation Agreement negotiations.*
- 2.1.1.2 As detailed in the Applicant's response to Consultation 2, submitted on 31 July, the Ferry Mitigation Agreement between The Isle of Man Steam Packet Company Limited and Morgan Offshore Wind Limited was signed on 29 July 2025.
- 2.1.1.3 Following conclusion of that agreement, the IoMSPC have submitted a letter to the Secretary of State withdrawing their objection to the Development Consent Order application.
- 2.1.1.4 In light of agreement being reached and those objections being withdrawn, the Applicant submits that the Secretary of State can conclude that: (i) all shipping and navigation effects as a result of the Morgan Generation Assets have now been addressed and mitigated, (ii) the Morgan Generation Assets would have no residual significant effects with respect to shipping and navigation interests and (iii) the Applicant has fully complied with the policies set out in NPS EN-3.

3 Blackpool Airport

3.1.1.1 Blackpool Airport and the Applicant have discussed point 5 of the Secretary of State's request for information dated 25 July 2025 and have agreed the below joint statement. Point 5 states:

5. The Applicant confirmed in their response to the Secretary of State's consultation letter of 19 June that it and Blackpool Airport had reached agreement on the wording of Requirement 9 in the Applicant's draft Development Consent Order. Blackpool Airport is requested to confirm this agreement.

3.1.1.2 Blackpool Airport and the Applicant can confirm that the parties have reached agreement on the wording of Requirement 9. The parties have identified some minor typographical errors in the version of the draft DCO submitted at Deadline 7. The corrections are shown in red below.

3.1.1.3 The parties are agreed that the requirement, as corrected, would be appropriate to include in any made DCO and would secure any necessary mitigation.

Operation of Blackpool Airport

9. –(1) No part of any wind turbine generator shall be erected as part of the authorised development until the Secretary of State, having consulted with the Operator and the Civil Aviation Authority, confirms in writing that ~~he is satisfied that either~~ –

(a) appropriate mitigation will be implemented and maintained throughout the lifetime of the authorised development; and

(b) appropriate arrangements have been put in place with the operator to ensure that such appropriate mitigation is so implemented and maintained.

(2) For the purposes of this requirement –

“appropriate mitigation” means measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the operator to provide safe airport operational and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding communication systems) for Blackpool Airport;

“approved mitigation” means the appropriate mitigation agreed with the ~~Civil Aviation Authority and the~~ operator and confirmed by the Secretary of State in accordance with sub-paragraph (1); and

“operator” means Blackpool Airport Operations Limited (incorporated in England and Wales with company number 09307995 and whose registered office is Number One Bickerstaffe Square, Talbot Road, Blackpool, FY1 3AH), or such other organisation as is licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services for Blackpool Airport. ~~;-and~~

~~“VHF” means very high frequency.~~

(3) The undertaker shall thereafter comply with all obligations contained within the approved appropriate mitigation for the life of the authorised development.

4 BAE Systems Marine Limited Walney Aerodrome

4.1.1.1 Paragraph 6 of the Secretary of State's letter is in relation to commercial negotiations and agreements and is set out as follows:

*6. The **Applicant** and BAE Systems Marine Limited Walney Aerodrome should provide an update on the status of their commercial agreements and whether agreement has been reached on the wording of Requirement 7 in the Applicant's draft Development Consent Order.*

4.1.1.2 As set out in the Applicant's response to Consultation 1, the Applicant considers that the commercial agreement can be entered into post-consent in line with standard industry practice. Progress has since been made on the Non-Disclosure Agreement between the parties.

4.1.1.3 In terms of Requirement 7, the Applicant set out its position in response to Consultation 2, submitted on 1 August. The Applicant respectfully submits that the Secretary of State should accept the Applicant's preferred wording as set out in Appendix B (B1) of its 31 July submission. The Applicant is aware that BAE will be responding to the Secretary of State on 8 August, however this is the Applicant's final position on this matter and the Applicant does not consider it necessary to provide any further response.

5 BAE Systems Operations Limited Warton Aerodrome

5.1.1.1 Paragraph 7 of the Secretary of State's letter is in relation to commercial negotiations and agreements and is set out as follows:

*7. The **Applicant** and BAE Systems Operations Limited Warton Aerodrome should provide an update on the status of their commercial agreements and whether agreement has been reached on the wording of Requirement 5 in the Applicant's draft Development Consent Order.*

5.1.1.2 As set out in the Applicant's response to Consultation 1, the Applicant considers that the commercial agreement can be entered into post-consent in line with standard industry practice. Progress has since been made on the Non-Disclosure Agreement between the parties.

5.1.1.3 In terms of Requirement 5, the Applicant set out its position in response to Consultation 2, submitted on 1 August. The Applicant respectfully submits that the Secretary of State should accept the Applicant's preferred wording as set out in Appendix B (B1) of its 31 July submission. The Applicant is aware that BAE will be responding to the Secretary of State on 8 August, however this is the Applicant's final position on this matter and the Applicant does not consider it necessary to provide any further response.

6 Defence Infrastructure Organisation

6.1.1.1 Paragraph 8 of the Secretary of State's letter is in relation to commercial negotiations and agreements and is set out as follows:

*8. The **Applicant**, BAE Systems Operations Limited Warton Aerodrome and the Defence Infrastructure Organisation should provide an update on whether agreement has been reached on the wording of Requirement 6 in the Applicant's draft Development Consent Order. The Defence Infrastructure Organisation should confirm if it can now remove its objection.*

6.1.1.2 As set out in the Applicants' response to Consultation 1, submitted on 1 August, the Applicant noted the final equivalent wording in the Mona Offshore Wind Farm Order 2025 for Requirement 23. The Applicant confirmed that DIO agreed with Requirement 6 drafting, as set out in Appendix B (B1) of its 31 July submission, which incorporated minor corrections to the Mona DCO as made.

6.1.1.3 The Applicant understands that the DIO cannot remove its objection, until the technical and operational assessments on the mitigation proposal (which was submitted by the Applicant to BAE Systems 24 February 2025) are concluded as viable, which is a matter for BAE Systems.

7 Mooir Vannin Offshore Wind Farm Limited

- 7.1.1.1 MVOWFL's submission to the Secretary of State on 1 August 2025 considered two matters: (i) wake effects and (ii) shipping and navigation. The Applicant has addressed these in turn below.

Wake effects

- 7.1.1.2 MVOWFL's submissions in respect of wake effects should be rejected by the Secretary of State.
- 7.1.1.3 The Applicant notes that in granting the Mona Offshore Wind Farm Order 2025, the Secretary of State's decision concluded that a requirement should be included on wake loss matters to secure approval of a wake effects plan or alternative mitigation agreed with the Orsted IPs. The Secretary of State's decision was based on the operational offshore windfarms owned by the Orsted IPs being "existing operational infrastructure" for the purposes of paragraph 2.8.196 and 197 of NPS EN-3, which would be impacted by the Mona Offshore Wind Project.
- 7.1.1.4 Those relevant provisions of NPS EN-3 would not apply to MVOWFL (and MVOWFL have not argued that they would), as Mooir Vannin Offshore Wind Farm is not "existing" or "operational" infrastructure. Any alternative interpretation would be a clear misinterpretation of policy.
- 7.1.1.5 The position of MVOWFL is entirely different to that of the Orsted IPs. No case on potential wake loss effects was substantiated by MVOWFL during the Examination, and no relevant policy argument was advanced. It would be unreasonable for any restriction to be imposed on the Morgan Generation Assets due to a potential wake effect on a project for which consent has not even been granted.
- 7.1.1.6 As set out in its response to Consultation 2, the Applicant considers that, following agreement being reached with the Orsted IPs and those parties having withdrawn their objections, the Secretary of State should conclude that the Applicant has met the NPS EN-3 requirements with respect to wake effects and it is unnecessary to include any wake effects requirement in the DCO for the Morgan Generation Assets, as suitable mitigation for existing operational infrastructure has already been agreed.

Shipping and Navigation

- 7.1.1.7 As set out in detail in section 7 of the Applicant's closing statement [REP6-014], the Applicant considers that it had been established by the close of the Examination that the separation distance between the Morgan Generation Assets and the Mooir Vannin array area was sufficient, that the risk to navigational safety as a result of the Morgan Generation Assets was ALARP, and that the Morgan Generation Assets accorded with the requirements of NPS EN-3. The Maritime and Coastguard Agency agreed with that conclusion (see ref. MCASN.30 in REP6-080).

- 7.1.1.8 As noted in section 2 above, the IoMSPC and the Applicant have now reached an agreement that has allowed the IoMSPC to withdraw its objections in full to the application.
- 7.1.1.9 The Applicant considers that it has addressed and mitigated or compensated for all potential shipping and navigation effects as a result of the Morgan Generation Asset, such that the Morgan Generation Assets would have no residual significant effects with respect to shipping and navigation matters. In respect of the submission of MOVWFL, the Applicant does not consider there is any residual issue that remains to be dealt with as part of the Morgan Generation Assets application.
- 7.1.1.10 The Applicant notes MOVWFL's reference to a 'transboundary effect'. The Applicant previously set out in its response to the Examining Authority's First Written Questions (GEN 1.7 of REP3-006) why the Isle of Man is not considered 'transboundary' for the purpose of the EIA Regulations. Notwithstanding that, as discussed during the Examination, the approach adopted by the Applicant includes a robust assessment of any potentially significant effects in the Isle of Man. As set out above, the Applicant does not consider there to be any residual effects relating to shipping and navigation to be addressed by Morgan Generation Assets.

8 Natural Resources Wales (Advisory)

- 8.1.1.1 Natural Resources Wales (Advisory)'s (NRW (A)) submission to the Secretary of State on 1 August 2025 references "a mismatch between REP6-057 and REP6-066" and the level of information provided by the Applicant as part of these respective assessments. The Applicant wishes to clarify for the avoidance of doubt what it considers NRW (A) to have meant by this statement and to reaffirm its agreement with NRW (A) that there is no adverse effect on integrity (AEol) for all Welsh sites from the Morgan Generation Assets either alone or in-combination with other plans and projects.
- 8.1.1.2 The Applicant has provided Habitats Regulations Assessment (HRA) information for consideration by the Secretary of State using both the Statutory Nature Conservation Bodies' (SNCBs) advised approach (REP6-057) and the Applicant's preferred approach (REP6-066). Both assessments conclude no adverse effect on the integrity of all European sites from the Morgan Generation Assets alone and in-combination with other plans and projects. As identified in the Joint Nature Conservation Committee's response to Consultation 1 and NRW (A)'s response to Consultation 2, additional information was provided as part of the assessment using the SNCB's preferred approach in order that the SNCBs were able to reach this conclusion beyond reasonable scientific doubt.
- 8.1.1.3 NRW (A), the Joint Nature Conservation Committee and Natural England all confirmed in their Consultation 1 responses and earlier submissions that AEol could be ruled out for the project alone and in-combination for those sites relevant to their remit when considering the SNCB's advised assessment approach. The Applicant understands that NRW (A) have submitted a further clarification to the Secretary of State confirming that it still agrees with the conclusion of no AEol from the Morgan Generation Assets alone and in-combination for any features of any Welsh SPAs/Ramsar sites. The Applicant and SNCBs are therefore agreed with respect to the conclusions of these assessments (REP6-057).
- 8.1.1.4 Whilst the Applicant maintains that its preferred approach is sufficiently precautionary to conclude no AEol, it has also provided assessment information based on the SNCB's preferred approach to enable the Secretary of State to reach a conclusion of no AEol, should the SNCB approach be selected to inform the Secretary of State's decision.