



Morgan and Morecambe OWFTA Case Team
Planning Inspectorate
MorganandMorecambeOWFTA@planninginspectorate.gov.uk
(Email only)

MMO Reference: **DCO/2022/00010**
Planning Inspectorate Reference: **EN020028**
Identification Number: **20051136**

11 April 2025

Dear David Cliff,

Planning Act 2008, Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited, Proposed Morgan and Morecambe Offshore Windfarm Transmission Assets Order

Response to Examining Authority's Rule 6 Letter

On 12 December 2024, the Marine Management Organisation (the MMO) received notice under section 55 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (the Applicants) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Morgan and Morecambe Offshore Windfarm Transmission Assets Order (the DCO Application) (MMO ref: DCO/2022/00010; PINS ref: EN020028).

The DCO Application seeks authorisation for the construction, operation and maintenance of Morgan and Morecambe Offshore Windfarm Transmission Assets, comprising of two onshore substations, 6 offshore export cables, 18 onshore export cables (6 circuits), 12 400 kilovolt (kV) grid connection cables (4 circuits) as well as the associated cables corridors with associated onshore and offshore infrastructure and all associated development (the Project).

Four Deemed Marine Licences (DML) are included in the draft DCO, with Schedule 14 (Marine Licence 1: Morgan Offshore Wind Project: Transmission Assets) and Schedule 15 (Marine Licence 2: Morecambe Offshore Windfarm: Transmission Assets) and the deemed marine licences for works in, on, under or over the tidal River Ribble, particularly in relation to the laying and maintaining of cables in Schedule 16 (Marine Licence 3: Morgan Offshore Wind Project: Transmission Assets – River Ribble) and Schedule 17 (Marine Licence 4: Morecambe Offshore Windfarm: Transmission Assets – River Ribble).



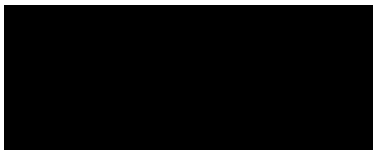
As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions are drafted in a DML that enable the MMO to fulfil these obligations.

The MMO received a Rule 6 letter on 28 March 2025. Please find the MMO's comments below:

- 1. Preliminary Meeting Attendance**
- 2. Comments on Examination Timetable**
- 3. Appendix F - Other procedural decisions made by the Examining Authority**
- 4. Anything further required from Examination Authority**
- 5. Responses to Relevant Representations**

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely,



[Redacted name]

Marine Licensing Case Officer

D [Redacted]

E [Redacted]



1. Preliminary Meeting Attendance

- 1.1 The MMO will not be attending the Preliminary Meeting on 29 April 2025. The MMO has reviewed the draft timetable for the examination of the application and would like to highlight the following concerns for consideration by the Examining Authority (ExA) as part of the preliminary hearing.

2. Comments on Examination Timetable

- 2.1 The MMO notes that the Preliminary Meeting and Issue Specific Hearing (ISH) 1 will be held consecutively. The MMO understands that this is usually to ensure that the ExA fully understands the issues at hand. The MMO believes this does not leave a lot of time for positions to change between Relevant Representation submission and the ISH.
- 2.2 The MMO notes that the Examination is principally a written process. The MMO understands that some issues need to be discussed in person to ensure understanding by the ExA.
- 2.3 At this stage, the MMO is not planning on attending any ISH, however, we will keep a watching brief and respond to any actions or questions posed by the ExA upon completion of any of the ISH. This is to ensure resource is spent on providing detailed written responses and resolving any issues with the Applicants.
- 2.4 If the ExA requests MMO's attendance for an ISH, it may still not be possible for the MMO to attend due to multiple examinations taking place at the same time and limited resources. The MMO would ask that hearings are organised to minimise the need for the MMO to be in attendance for all hearings, (e.g., discussing both offshore matters and onshore matters). In addition to this, the MMO would welcome any discussions on the DML or offshore DCO sections to be discussed at the earliest opportunity within the agenda. For example, in East Anglia One North and East Anglian Two, the agenda was rearranged to enable MMO involvement at the start of the hearing. This would enable better time utilisation, allowing for a more efficient and effective examination.
- 2.5 The MMO requests where possible the deadlines are not set on a Monday.
- 2.6 The MMO notes that Deadline 2 is 3 June 2025 and this is 8 days after Deadline 1, the MMO notes Deadline 1 may have multiple large submissions by the Applicants and Interested Parties and due to the bank holiday, requests this is moved to later that week, suggesting Thursday 5 June.
- 2.7 The MMO would like to highlight that we may not be able to respond to all ExA written questions (especially technical topics) at Deadline 3, the MMO will work to provide as many responses as possible. The MMO suggests Deadline 3 is week commencing 14 July, however, would note that this is still a tight turn around for consultation with our scientific advisors.
- 2.8 The MMO would also highlight that July is towards the end of multiple offshore windfarm examinations (Dogger Bank South and North Falls) and there will be a lot of resource from all interested parties working on trying to resolve as many issues as possible prior to the Examination closing which may have to be prioritised over a more detailed response at Deadline 3.



2.9 The MMO does not want to delay any information to the Applicants or ExA but resource on multiple topics of similar nature is limited. The MMO will work with the Applicants to ensure we are discussing and moving topics/issues forward and have suggested meetings are set up in advance with the Applicants, ourselves and our scientific advisors to discuss any issues throughout examination.

2.10 The MMO notes that there is a seven working day difference between Deadline 6 and Deadline 7. The MMO believes this is due to the longer deadline between Deadline 4 and 5 over the summer period. The MMO would advise that although we would like to resolve most of the issues by Deadline 6, on multiple recent projects in examination this continued up until the close of examination including the submission of multiple updated Application documents at each deadline and towards the end of examination. The MMO would request that Deadline 6 is moved earlier to provide sufficient time to respond to all the issues still outstanding and any documents submitted at Deadline 6 on the final deadline (Deadline 7).

3. Appendix F - Other procedural decisions made by the Examining Authority

3.1 The MMO notes that the ExA has requested the final submission of draft development consent order (dDCO) at Deadline 6 – the MMO notes that on a number of recent Examinations this was further updated for the final deadline due to ongoing major issues with interested parties and suggests this is taken into consideration.

4. Anything further required from Examination Authority

4.1 The MMO notes that the ExA has requested Summaries of Relevant Representations that exceed 1500 words at Pre-examination Procedural Deadline. Due to resourcing, the MMO will provide a summary of Relevant Representation at Deadline 1.

4.2 The MMO has not yet been provided with a copy of the Applicant's draft Statement of Common Ground. The MMO will review this once received by the Applicants but notes this may not be in time for Deadline 1.

5. Responses to Relevant Representations

5.1 The MMO is reviewing further RRs submitted, specifically:

- **Corporation of Trinity House of Deptford Strond (RR-0442)**
The MMO maintains a watching brief on the response from this Interested Party (IP).
- **Historic England (RR-0839)**
The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.
- **Maritime and Coastguard Agency (RR-1418)**
The MMO maintains a watching brief on the response from this IP.
- **Natural England (RR-1601)**



The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **Environment Agency (RR-0677)**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **North West Wildlife Trusts & The Wildlife Trust for Lancashire, Manchester and North Merseyside (RR-1655 & RR-2180)**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **Canal & River Trust (RR-0287)**

The MMO maintains a watching brief on the response from this IP.

- **Lancashire County Council (RR-1262)**

The MMO maintains a watching brief on the response from this IP.

- **South Ribble Borough Council (RR-2027)**

The MMO maintains a watching brief on the response from this IP.

- **Fylde Borough Council (RR-0705)**

The MMO maintains a watching brief on the response from this IP.

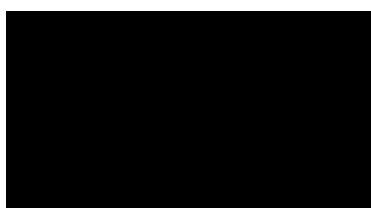
- **Preston City Council (RR-1775)**

The MMO maintains a watching brief on the response from this IP.

- **Blackpool Borough Council (RR-2032)**

The MMO maintains a watching brief on the response from this IP.

Yours sincerely,



[Redacted name]

Marine Licensing Case Officer

D [Redacted]

E [Redacted]

