



WRITTEN REPRESENTATION ON BEHALF OF ORSTED EAST IRISH SEA
TRANSMISSION LIMITED (REF NO: MMTA-OP010)

IN CONNECTION WITH THE 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

1. Introduction

- 1.1 This written representation is provided in accordance with Deadline 1 of the examination timetable for the application made by Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “**Applicants**”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“**Project**”).
- 1.2 We represent Orsted East Irish Sea Transmission Limited (“**OEIST**”), which filed a relevant representation (accepted as an additional submission) [AS-064] in respect of the Project.
- 1.3 As outlined in its relevant representation, OEIST is the developer of the East Irish Sea Transmission Project (the “**MV transmission project**”), which is the proposed transmission infrastructure located within England and English waters required to connect the Mooir Vannin Offshore Wind Farm (“**MVOWF**”) to the UK grid. A grid connection has been secured for MVOWF and an application for Marine Infrastructure Consent for the Mooir Vannin Generation Project was submitted in March 2025.
- 1.4 The MV transmission project has been awarded a section 35 direction under the Planning Act 2008 and an application will be made for a Development Consent Order for an Onshore Substation, Electricity Balancing Infrastructure, offshore booster stations, offshore and onshore cabling and associated development as required.
- 1.5 The location of MVOWF is displayed on Figure 9.4, Chapter 9 of the Environmental Statement (the “**ES**”) [APP-066]. The MV transmission project is not displayed on this figure but, as the Applicants have noted in their response to relevant representations [PDA-007], it has been screened into the cumulative effects assessment for the Project.
- 1.6 Due to the proximity of the Project to the MV transmission project, OEIST seeks close engagement with the Applicants in respect of the overlap between their developments. In particular, OEIST has concerns regarding the crossing of offshore transmission infrastructure, potential onshore crossings, the extent of land take in the vicinity of the River Ribble and access to the Penwortham substation. Both projects have secured grid connections to the Penwortham substation and will require access to construct and maintain the required grid connections.
- 1.7 In light of the above, and the issues raised in this representation, OEIST considers a statement of common ground with the Applicants may be helpful as matters progress.

2. Transmission crossings

- 2.1 OEIST considers there to be potential for both the offshore and onshore transmission cables required for the MV transmission project and the Project to overlap.
- 2.2 OEIST notes the Applicants’ comment in its response to relevant representations [PDA-007] that the date for MVOWF’s connection to the grid is 2037 and therefore the Applicants consider any overlap between construction of the MV transmission project and the Project is likely to be limited.
- 2.3 However, considerable work is being undertaken to develop MVOWF’s grid connection and the routing options for the MV transmission project are under consideration. The results of this work indicate it is highly probable that the grid connection date will be brought forward and therefore it is possible the construction of the two developments will overlap. As such, the Applicants cannot rely on there being limited overlap between the developments in carrying out their assessments of the Project – such an approach would not be safe or reasonable.
- 2.4 It is not clear how the Applicants plan to manage this likely overlap of the assets. OEIST consider engagement from the Applicants is necessary in order to reach agreement regarding this matter. If such engagement is not forthcoming, or this matter is not able to be addressed by agreement, OEIST will seek that protective provisions are incorporated in the development consent order to ensure its interests are adequately protected.

3. Grid connection at Penwortham

- 3.1 The MV transmission project and the Project will both connect to the Penwortham substation. Evidently, both projects will require access to construct connections to the substation. Both developers will require land rights for the installation of cables and ancillary rights to facilitate the construction and maintenance of the assets.

- 3.2 The Applicants are seeking to compulsorily acquire extensive property rights (both permanent and temporary) surrounding the Penwortham substation. These are illustrated on Land Plan – Sheet 18 [AS-019].
- 3.3 As outlined in the statement of reasons [AS-010], these rights are required to enable access to the cable corridor, the construction, operation and decommissioning of underground cables and ancillary infrastructure and to connect the cables to the National Grid substation. These rights apply throughout the construction, operation, maintenance and decommissioning phases of the Project. As outlined in the draft development consent order [AS-005], the rights sought include the imposition of restrictive covenants which would prevent, among other matters, construction works, excavation and activities which would alter, increase or decrease ground cover or soil levels.
- 3.4 OEIST considers the extent of rights sought surrounding the substation to be excessive and may impede its ability to deliver the MV transmission project. It is acknowledged that the Applicants' broad-brush approach to the acquisition of property rights to enable the Project's grid connection is likely to have arisen from a lack of detail provided by National Grid Electricity Transmission ("**NGET**") regarding the Project's grid connection. OEIST therefore suggest that NGET should be engaged early in the process to clarify the details of the Project's connection, which would allow for property rights sought by the Applicants to be narrowed to reflect what will be necessary for the Project.
- 3.5 If NGET is unable to provide such detail at this stage, it is suggested that the development consent order will require a mechanism for reducing the extent of rights sought for the grid connection as quickly as possible, to ensure the Project does not impede other developments' access to the Penwortham substation.
- 3.6 Additionally, it is noted that Penwortham and the surrounding area (including the River Ribble) is subject to utilities, agriculture and other land use and environmental constraints. OEIST would like to work with the Applicants (in addition to NGET and the National Grid Energy System Operator) to ensure that the Applicants' works do not create significant challenges or sterilise access to Penwortham for the MV transmission project.

Shepherd & Wedderburn LLP

20.05.2025