

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Deadline 1 Cover Letter

Deadline: Deadline 1
Application Reference: EN020028

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20 May 2025

The Planning Inspectorate
National Infrastructure Directorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Dear Sir / Madam,

Planning Act 2008
The proposed Morgan and Morecambe Offshore Wind Farms: Transmission Assets
Planning Inspectorate Reference Number: EN020028

Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL), (together, the Applicants), enclose their submission for Deadline 1.

Please find below an overview of key documents within this submission.

Application Guide

The Applicants have updated the Application Guide (A4 F05) and have provided a clean and tracked change version of this document. The updated Application Guide contains a complete list of documents comprising the Applicants' Deadline 1 submission.

Procedural Deadline Submissions

The Applicants have reviewed the procedural deadline submissions and have provided a response where needed in The Applicants' Response to Procedural Deadline A Submissions by Interested Parties (document reference S_D1_11). If it has not been possible for the Applicants to provide a full response at Deadline 1 they have indicated at which deadline this will be provided.

Hearing Summaries

The Applicants have submitted a Hearing Summary for ISH1 Day 1 (Applicants' Hearing Summary ISH1 Day 1, S_D1_2), ISH1 Day 2 (Applicants' Hearing Summary ISH1 Day 2, S_D1_3) and CAH1 (Applicants' Hearing Summary CAH1, S_D1_4). Hearing Summaries cross refer to the Hearing Action Points (S_D1_5) and supporting Appendices (S_D1_5.1 to S_D1_5.10) to clarify where agreed actions are responded to.

Examining Authority's Hearing Action Points

The Applicants have responded to the Examining Authority's Hearings Action Points raised following the Issue Specific Hearing 1 (ISH1) and Compulsory Acquisition Hearing 1 (CAH1). The Applicants' responses are within the document Response to Hearing Action Points (S_D1_5) and supporting Annexes (S_D1_5.1 to S_D1_5.10).

Land Plan, Crown Land Plan and Special Category Land Plan

Updates to the Land Plan, Crown Land Plan and Special Category Land Plan are being provided by the Applicants to address the points set out below.

Through ongoing engagement with The Crown Estate (TCE), it has come to the Applicants' attention that TCE's interest extends to lowest astronomical tide, not mean low water springs as previously understood. The Applicants have therefore amended land plots 01-001 and 01-002 on the Land Plan to reflect TCE's interest. The revisions are depicted on new sheets 20 and 21 of the Land Plan (document reference B10) as they are not visible due to the scale of the existing Land Plan sheets. The Special Category Land (document reference B20) and Crown Land (document reference B19) plans have also been updated to reflect the amendments to plots 01-001 and 01-002.

Through ongoing engagement with the representatives of the King's Most Excellent Majesty in Right of His Duchy of Lancaster, they have advised that they do not hold an interest in plots 01-001, 01-002, 01-003, 01-004, 01-004i, 01-017, 02-003 and 02-004. These plots have therefore been removed from the Crown Plans.

Statements of Common Ground and Statement of Commonality

Initial Statements of Common Ground (SoCG) have been prepared between the Applicants and other parties at the request of the Examining Authority in the Rule 6 letter. These have been prepared to set out the areas of agreement and disagreement with these parties in relation to the Development Consent Order application for the Morgan and Morecambe Offshore Wind Farms Transmission Assets. These will be progressed and updated through the Examination.

A SoCG has not been progressed with Natural England for Deadline 1. As set out in Natural England's Response to the Rule 6 Letter (PDA-043) at Procedural Deadline A, Natural England has advised the Applicants and the Examining Authority that they will not engage in the production of a SoCG at Deadlines 1, 3, and 4 in lieu of their Principal Areas of Disagreement Summary Statements (PADSS) and Risks and Issues Log, the latter of which they state will be submitted at Deadline 1. Natural England's Response to the Rule 6 Letter also states they will engage with the Applicant on the final SoCG requested by the Examining Authority at Deadline 6. The Applicant will therefore engage with Natural England through the Examination via their PADSS and Risks and Issues Log and prepare a final SoCG at Deadline 6.

The Examining Authority has requested the Applicants provide a Statement of Commonality. The Applicants Statement of Commonality (S_D1_6) provides a summary of the progress for each of the requested SoCGs including and, where relevant, the reasons why a SoCG requested in the Rule 6 letter is not being progressed.

Matters raised by Natural England

The Applicants' Response to the ExA's Rule 9 letter (AS-067) included a commitment at Deadline 1 to provide an update on several matters.

Whilst the Applicants maintain that Measures of Equivalent Environmental Benefits (MEEB) are not required, a Stage 2 Marine Conservation Zone (MCZ) Assessment and a 'Without Prejudice' MEEB case in respect of the Fylde MCZ have been submitted (S_D1_9).

The Applicants are continuing to proactively engage with Natural England regarding the potential effects on the Liverpool Bay Special Protection Area (SPA), Ribble and Alt Estuaries SPA/Ramsar site and Natural England's request for further surveys and assessments to inform the potential impact upon Lytham St. Anne's Dunes Site of Scientific Interest (SSSI).

With regard to the potential ornithological impacts on the Ribble and Alt Estuaries Special Protection Area (SPA)/Ramsar site and the Liverpool Bay SPA, the Applicants met with Natural England on 28 April 2025. The Applicants consider that appropriate mitigation can be developed, and therefore an in-principal derogation case is not required in relation to either site. The Applicants remain committed to working collaboratively with Natural England with the objective of reaching agreement that there will be no adverse effect on integrity of the Ribble and Alt Estuaries SPA/Ramsar site and will provide a further update at Deadline 3.

In respect of Natural England's request for further surveys and assessments to inform the potential impact upon Lytham St. Anne's Dunes SSSI, the Applicants are progressing information to be submitted at Deadline 3 to address their concerns. This information will be provided to supplement the Applicants' response on this matter at Procedural Deadline A (PDA-014 and PDA-021) which the Applicants anticipate will allow Natural England to rule out significant impacts on sand dune SSSI features associated with Lytham St. Anne's Dunes due to changes to the water table during construction and operation. This information will include a Preliminary Hydrogeological Risk Assessment informed by existing hydrogeological information from desk study information, Ground Investigation data, and National Vegetation Classification and Phase 1 habitat survey data presented in the ES. The Applicants have requested a follow-on meeting with Natural England to share and discuss the outcome of the Preliminary Hydrogeological Risk Assessment in advance of submission at Deadline 3.

Within the Applicants' response to Natural England's Relevant Representation (RR-1601H.58), a discrepancy was acknowledged in paragraph 1.6.3.182 of E2.3 Habitats Regulations Assessment (HRA) Stage 2 Information to Support an Appropriate Assessment Part Three – Special Protection Areas (SPA) and Ramsar Site assessments (APP- 017). The Relevant Representation response stated that APP-017 would be updated at Deadline 1. However, as there are minimal changes to the document (changing Liverpool Bay/Bae Lerpwl to Ribble and Alt Estuaries SPA) and the conclusions of the report would remain unchanged, the discrepancy is captured now within the Errata document (S_D1_14).

Update on Engagement with Blackpool Airport and BAE Systems

The Applicants met with Blackpool Airport on Friday 9 May and again on Thursday 15 May, and with BAE Systems on Monday 12 May and again on Monday 19 May, in relation to agreeing a strategic approach to resolving concerns related to potential bird strike associated with the proposed ecological mitigation areas. A proposal has been discussed with Blackpool Airport and BAE Systems and submitted to both stakeholders for consideration. The Applicants believe an agreement can be reached to resolve the airport and aerodrome's concerns, and will provide an update at Deadline 2, including submitting the relevant technical information and an update on any other matters that have been agreed.

Blackpool Airport have confirmed that they do not intend to proceed with a Statement of Common Ground at this stage to instead focus resource on the cooperation agreement and land agreement negotiation. BAE Systems have confirmed that they will work towards a Statement of Common Ground but wish to focus on agreeing the existing workstreams so that a more detailed update within the Statement of Common Ground process can be submitted at Deadline 3.

Updating outline Management Plans at Deadline 2

The Applicants will submit updates to the relevant outline management plans at Deadline 2 to include clarifications and respond to points raised by stakeholders in Relevant Representations, Written Representations and Local Impact Reports, and points raised by the Examining Authority during the Issue Specific Hearing.

Kind regards,

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Project Consent Manager

Morgan and Morecambe Offshore Wind Farms:
Transmission Assets project,
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Consents Lead

Morgan and Morecambe Offshore Wind
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