

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' response to Hearing Action Points due at Deadline 1

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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

Term	Meaning
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy Investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.

Term	Meaning
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	<p>The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>
Transmission Assets Order Limits: Onshore	<p>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>

Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario

Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPP	Pollution Prevention Plan
PRoW	Public rights of way
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

Unit	Description
KJ	Kilojoules
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
m	Metres
m ²	Metres squared
m ³	Metres cubed
nm	Nautical mile
μPa	micropascal

1 The Applicants' response to Hearing Action Points due at Deadline 1

1.1 Introduction

1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at:

- Issue Specific Hearing 1 (ISH1) on 30 April and 1 May 2025; and
- Compulsory Acquisition Hearing 1 (CAH1) on 2 May 2025.

1.1.1.2 The Hearing Action Points identified as being addressed at future Deadlines are listed in Table 1.1.

Table 1.1: Hearing Action Points that will be addressed later in examination

Ref.	Agenda Item	Directed to	Action	Deadline
ISH1_2	3(b)	Applicants	Update or provide an addendum to the Planning Statement commenting on recent changes to planning policy including the consultation on the National Policy Statements (including a comment on transitional arrangements) and updates to the National Planning Policy Framework.	Deadline 2
ISH1_5	3(c)	Applicants	Ensure that policy trackers are kept updated throughout the examination.	Ongoing
ISH1_35	6(b)	Applicants	Provide an analysis relating to the Abnormal Indivisible Load swept path as an appendix to the Outline Construction Traffic Management Plan (APP-211).	Deadline 2
ISH1_36	6(b)	Applicants	Confirm the road geometry viability of the highway network links for two-way HGV traffic to Lancashire County Council by D1 before submission to the examination by D2.	Deadline 2

1.1.1.3 All other Hearing Action Points from ISH1 and CAH1 are addressed in Table 1.2 and associated appendices and documents.

1.2 Applicants Response to Hearing Action Points due at Deadline 1

Table 1.2: Responses to general and overarching questions.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
ISH1 - Item 3 - Relevant policy				
ISH1_1	3(a)	Applicants	Update planning statement clarifying applicants' position as to the application of section 104 Planning Act 2008 (PA2008).	The Applicants have submitted the updated Planning Statement at Deadline 1 (Reference number: J28 F02)
ISH1_3	3(b)	Applicants	Submit the Clean Power 2030 action plan	The Applicants have submitted the Clean Power 2030 action plan at Deadline 1 (Reference number: S_D1_5.1.
ISH1_4	3(b)	Fylde Borough Council	<i>Provide an update on their Local Plan and also comment on the current planning policy position for Preston City Council and South Ribble Borough Council.</i>	
ISH1 - Item 4 - Site selection				
ISH1_6	4(a)	Applicants	Comment on the two court cases referred to by the Examining Authority as to how to treat the assessment of alternatives and how material the alternative option of the Stanah substation is for the project. The two cases are R	The Applicants have responded to this Hearing Action Point in document Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2).

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response										
			(on the application of Save Stonehenge World Heritage Site Ltd) v Secretary of State for Transport in 2025 and R (on the application of Langley Park School) v Bromley LBC in 2009.											
ISH1_7	4(a)	Applicants	Provide a practical example on how consultation is taken into account in the BRAG (Black, Red, Amber, Green) process to refine a route. In addition, a BRAG appraisal was carried out for land including the Green Belt. Explain why an amber appraisal rating was used for the Green Belt constraint in the context of national Green Belt policy.	The site selection and refinement of the onshore cable corridor followed an iterative process to ensure the most appropriate and efficient solution was identified taking account of balancing environmental and engineering constraints with consultation feedback. Further information on the site selection for the onshore cable route can be found in Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028). As detailed below within the table, there were four stages of the site selection progress, which incorporated consultation feedback at each phase to further refine the siting and design of the onshore cable corridor infrastructure. Further information on the consultation undertaken can be found within the Consultation Report (APP-170).										
				<table><tr><th>Site Selection Stage</th><th>Consultation undertaken</th></tr><tr><td>Stage 1 - Identification of Point of Interconnection (PoI)</td><td>Non-statutory consultation (November-December 2022)</td></tr><tr><td>Stage 2 - Identification of areas of search</td><td>Evidence Plan Process Consultation with statutory bodies</td></tr><tr><td>Stage 3 - Refinement of the siting and design of the Transmission Assets for PEIR</td><td>Non-statutory consultation (April-June 2023) Statutory Consultation on S42 on the Preliminary Environmental Information Report (PEIR) (October – November 2023) Evidence Plan Process Consultation with statutory bodies</td></tr><tr><td>Stage 4 – Refinement of the siting and design of the Transmission Assets for DCO application</td><td>Landowner meetings (December 2023) Targeted Statutory Consultation (February – March 2024)</td></tr></table>	Site Selection Stage	Consultation undertaken	Stage 1 - Identification of Point of Interconnection (PoI)	Non-statutory consultation (November-December 2022)	Stage 2 - Identification of areas of search	Evidence Plan Process Consultation with statutory bodies	Stage 3 - Refinement of the siting and design of the Transmission Assets for PEIR	Non-statutory consultation (April-June 2023) Statutory Consultation on S42 on the Preliminary Environmental Information Report (PEIR) (October – November 2023) Evidence Plan Process Consultation with statutory bodies	Stage 4 – Refinement of the siting and design of the Transmission Assets for DCO application	Landowner meetings (December 2023) Targeted Statutory Consultation (February – March 2024)
				Site Selection Stage	Consultation undertaken									
				Stage 1 - Identification of Point of Interconnection (PoI)	Non-statutory consultation (November-December 2022)									
				Stage 2 - Identification of areas of search	Evidence Plan Process Consultation with statutory bodies									
				Stage 3 - Refinement of the siting and design of the Transmission Assets for PEIR	Non-statutory consultation (April-June 2023) Statutory Consultation on S42 on the Preliminary Environmental Information Report (PEIR) (October – November 2023) Evidence Plan Process Consultation with statutory bodies									
Stage 4 – Refinement of the siting and design of the Transmission Assets for DCO application	Landowner meetings (December 2023) Targeted Statutory Consultation (February – March 2024)													

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<div>Evidence Plan Process Consultation with statutory bodies</div> <p>Appendix A, provides a figure illustrating example(s) of how consultation feedback has been taken into account when refining the onshore cable corridor route. The examples in the figure highlight:</p> <ul style="list-style-type: none"> the removal of the option to lay cables in the public highway based on local residents and community feedback; and re-routing the onshore export cable corridor into areas with greater proportions of red constraints to accommodate landowner feedback. <p>The Applicants can confirm that the Black Red Amber Green (BRAG) appraisal for the onshore cable corridor did not include Green Belt as an assessment criteria. The constraints used in the BRAG criteria can be found in Table 4.14 and 4.18 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028).</p> <p>Paragraph 5.11.2 of NPS EN1 states that <i>'The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'</i> The onshore cable corridor, once installed, will be buried for its entire length maintaining the openness of the Green Belt. Therefore, the Applicants considered that there would be no impact to the fundamental aim of Green Belt Policy from the underground cables and therefore Green Belt was not included in the BRAG assessment criteria for the onshore cable routing for the Transmission Assets.</p> <p>The Applicants can confirm that Green Belt land was considered within the BRAG Assessment of onshore substation search zones and onshore substation options (Table 4.7 and Table 4.10 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028)), under the 'Planning policy and future development potential' category.</p> <p>Locations for onshore substation siting that were within identified Green Belt were assessed as an amber appraisal rating: "Located within the Green Belt and / or Area of Separation and proposal for further development or existing planning applications".</p> <p>The Applicants assert that the assignment of Green Belt land as 'Amber' is correct for the purposes of the onshore substation site selection process, and aligns with National Planning Policy Framework (NPPF) policy Section 13 – 'Protecting Green Belt</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>land'. Land covered by Green Belt policy does not preclude that land from consideration for development and is not an absolute constraint.</p> <p>AS-028 and HAP ISH1_10 set out the rationale for identification of the search area for the onshore substation zones and the physical constraints associated with the definition of that search area. Numerous constraints were identified within the initial 5 km radius around the Penwortham Point of Interconnection (e.g. areas of infrastructure, landfill, all roads, railways, flood zones, priority habitat and high-pressure gas mains) and although not explicitly stated in AS-028, areas within the 5 km radius also included Green Belt land. More detail on the expansion of the search radius around the Penwortham POI is included within HAP ISH1_10.</p> <p>The four zones identified within the 8 km search area all had sections of Green Belt identified within them. Zones 1, 3 and 4 had large sections of Green Belt within them. Whereas, Zone 2 had a smaller section Green Belt but the BRAG identified that this was not preferred for other reasons (i.e. lack of available land for siting). The Applicants concluded that Green Belt land could not be avoided for the site selection of the onshore substations.</p> <p>Paragraph 153 of the NPPF directs that development that is considered "by definition, harmful to the Green Belt...should not be approved except in very special circumstances" and 'Very Special Circumstances' will not exist unless the potential harm to Green Belt and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p>The Applicants consider that very special circumstances exist that clearly outweigh the harm arising from the development of the onshore substations on Green Belt Land.</p> <p>The Applicants also consider that the Transmission Assets benefit from the presumption given to Critical National Priority Infrastructure (CNP Infrastructure) as evidenced in Section 3.4.4 of the Planning Statement (APP-233) and set out in NPS EN-1 (paragraphs 4.2.16 and 4.2.17). Paragraph 4.2.16 of NPS EN-1 states that CNP Infrastructure is assumed, as a starting point, to have met any tests which are set out within the NPSs or any other planning policy, which requires a clear outweighing of harm, exceptionality or 'Very Special Circumstances, provided that the Applicants demonstrate that the mitigation hierarchy requirements have been met (set out in section 3.4.4.15 of the Planning Statement (J28 F02)).</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>This includes the requirements for 'Very Special Circumstances' to allow for development in the Green Belt, in accordance with paragraph 5.11.20 of NPS EN-1, paragraphs 8.57 - 2.8.58 of NPS EN-3, Policy CS6 (Green Infrastructure) of the Blackpool Local Plan Part 1 and Strategic Policy GD2 (Green Belt) of the Fylde Local Plan, as well as other related local planning policies, considered in further detail in the Local Planning Policy Tracker (APP-236).</p> <p>The Applicants consider on the basis of the above an 'Amber' appraisal rating for the Green Belt constraint in the context of national Green Belt policy is appropriate.</p>
ISH1_8	4(a)	Applicants	Submit the Holistic Network Design (HND July 2022) summary report emphasising any key points relevant to the Examination.	The Applicants have responded to this Hearing Action Point in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2).
ISH1_9	4(a)	Applicants	Submit the Parliamentary statement concerning the Hillside Technology Zone close to the grid connection at Stanah and written statement from Michael Shanks MP together with the subsequent written question.	The Applicants have responded to this Hearing Action Point in Annex 5.2 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2). This contains the written questions, answers and statements of 12, 17 and 20 December 2024.
ISH1_10	4(d)	Applicants	Explain the rationale for 8km radius search area in relation to the onshore substations as shown in Figure 4.2 of volume 1, Annex 4.3 (AS-028).	The rationale for the 8 km radius search area in relation to the onshore substation is detailed fully in Section 4.5.3 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028). To commence the site selection and consideration of alternatives for the onshore substations, an initial 5 km search area was drawn around the identified Point of Interconnection at the National Grid Substation at Penwortham. A radius of 5 km was used as the optimal distance for the length of the 400 kV grid connection cables that would link the new project substations to the Point of Interconnection. This is based on electrical engineering constraints identified through early engagement with supply chain: to minimise cable reactive power issues and transmission losses, and to maximise economic efficiency.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>An exercise was undertaken to identify zones within the 5 km search area with the greatest potential for suitable land parcels to accommodate the onshore substations. Numerous constraints were identified within the initial 5 km radius (including areas of infrastructure, landfill, roads, railways, flood zones, priority habitat and high-pressure gas mains). These constraints are shown in Figure 4.2 of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028).</p> <p>Due to the extensive physical constraints within the 5km search area, the Applicants concluded that there were no suitable land parcels that could accommodate both onshore substations, either immediately adjacent to each other (i.e. one onshore substation footprint containing two onshore substations) or separate but within the same zone. The lack of suitable land parcels also meant that the site selection process could not identify any alternative locations for consideration. Therefore, the decision was made to widen the search area radius to 8 km. The Applicants did not consider it necessary to extend the search area further than 8 km as suitable sites for the onshore substations were identified within the 8 km radius.</p> <p>Extending the search area beyond 8 km would require longer 400 kV grid connection cables which would likely result in electrical losses that would create inefficiencies within the generation transfer to the grid. If the radius was extended beyond 8 km, then electrical compensation would be required, which could include greater quantities or sizes of electrical equipment within the projects' onshore substation footprints. This would likely result in larger onshore substation footprints with potentially greater maximum height requirements.</p> <p>See response to ISH1_12 for a summary of the site selection within the 8 km search area.</p>
ISH1_11	4(e)	Applicants	Provide a clarification concerning their response to Fylde Council's Relevant Representation (RR-0705), concerning a sequential test relating to land which is not Green Belt has been undertaken to aid the site selection process.	<p>In their response to Fylde Council's Relevant Representation (PDA-030) the Applicants' referred to the specific flood risk sequential test set out in section 1.9 of the Flood Risk Assessment (APP-074) and should have clarified that this is the only specific non-Green Belt sequential assessment carried out to aid site selection. However, the approach to site selection in general has been sequential (as evidenced by the staged approach within Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028)), and has considered both Green Belt and non-Green Belt land. See Applicant's</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				response to HAP ISH1_7 for more information on how Green Belt was considered within the site selection and consideration of alternatives process.
ISH1_12	4(d)	Applicants	Provide clarification on their site selection for the substations and the choice for separate sites.	<p>The onshore substation site selection process considered the need to identify locations for two onshore substations, one for the Morgan Offshore Wind Project and one for the Morecambe Offshore Windfarm. The Applicants coordinated and aligned the onshore substation site selection process from its outset through to Application, underpinning the coordinated approach to siting and design of the Transmission Assets.</p> <p>The site selection and consideration of alternatives process, as outlined in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives (AS-026) and Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028), also had due regard to the Horlock Rules and NPS EN1 (Section 4.3.2). See also responses to ISH1_7 (on the approach to BRAG assessment), ISH1_10 (on the 8km search area), and ISH1_25 (on co-ordination minimising community and environmental impacts).</p> <p>The key elements of the onshore substation site selection process were as follows:</p> <ul style="list-style-type: none"> • Co-ordination: a coordinated process was undertaken that aligned identified site selection principles, joint mapping and appraisal of key constraints, consolidation of consultation activities, and joint consideration of feedback; • Co-location: the Applicants sought to site the onshore substations in proximity to each other (i.e. within the same onshore substation search zone) to avoid infrastructure proliferation and maintain a co-ordinated grid connection route as far as possible to the PoI (which was a recommendation of the Holistic Network Design process and is reflected in NPS policy in EN-5). An explanation of the identification of Penwortham as the PoI for the Transmission Assets can be found in HAP ISH1_6, ISH1_8. and ISH1_9. • Zonal and Iterative Approach: within the area of search (8km – see response to ISH1_10) an iterative approach was taken, as follows: <ul style="list-style-type: none"> ○ The use of the zonal approach allowed for the alignment of the siting of onshore infrastructure, using the coordinated site selection process to reduce impacts for each chosen site. The identification of a zone of sufficient size to accommodate both onshore substations was the main

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>consideration and areas not of a suitable size to accommodate both onshore substations were excluded through the process.</p> <ul style="list-style-type: none"> ○ There were no land parcels within any zone sufficiently sized to accommodate <u>together</u> both onshore substation platform footprints and associated effective mitigation. This applies whether or not the substations were located in two immediately adjacent sites or a single site. ○ The approach taken (two substations co-located in a single zone but not directly adjacent) ensures that in a scenario where only one project is built, the substation would still be sited appropriately and allow for effective mitigation – rather than being sited along with a project that does not exist (and therefore does not align with site selection principles). Other advantages of the approach taken are noted in the bullets below on access and avoiding other developments. ○ A preferred zone was identified following non-statutory consultation (primarily to avoid existing buried infrastructure and environmental designations). The selected zone – Zone 1 - did not identify high risk (red or black) BRAG constraints. Within Zone 1, a further refinement (including factors such as residential buffers) was carried out which identified a preferred location for the Morgan onshore substation and two possible locations for the Morecambe onshore substation. ○ Following statutory consultation, the southern onshore substation option for Morecambe Offshore Windfarm was selected for reasons of distance from residential properties, a separate construction access from the A584, reduced onshore export cable and 400kV grid connection cable corridors and other refinements made (See 4.5.2.3 and 4.5.5.5. of the Site Selection Chapter, and Section 4.3.1.1 (Page 7) of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028)). The shape and positioning of the area for the Morgan Offshore Wind Project onshore substation was also altered in response to Section 42 consultation feedback received from the community (i.e. that the location of the onshore substation was too close to Kirkham South and Hall Cross) and landowners (see 4.5.5.15, 4.5.5.16 and Figure 4.9: Morgan PEIR

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>substation site and DCO substation site of Volume 1, Annex 4.3: Selection and Refinement of the Onshore Infrastructure (AS-028) .</p> <ul style="list-style-type: none"> Site Access: The initial design of the construction and operation access to the onshore substations was to take access for both onshore substations from the A583. Feedback received from Section 42 consultation was that this would result in both projects utilising the A583 during onshore substation construction resulting in significant pressure on one particular highway link to accommodate all construction traffic. The Transmission Assets took the site selection decision to design separate construction access from the A584 and A583 to access the Morgan Offshore Wind Project onshore substation site and Morecambe Offshore Wind Farm onshore substation Option 2 (South), respectively. In a similar way. If the Applicants had selected a single substation site for both projects, this would have resulted in a single access for construction (and operation), resulting in significant pressure on one particular highway link to accommodate all construction traffic. The coordination of the Transmission Assets onshore substation site selection processes has allowed the Applicants to make the decision to separate the construction and operation accesses. Other developments: the Morecambe Offshore Wind Farm onshore substation Option 2 (South) avoids crossing the proposed Bluefield Solar Farm Development with export cables – this could only be considered holistically due to the coordination of the site selection process between the Morgan Offshore Wind Project and Morecambe Offshore Wind Farm onshore substation site. The selection of a single site for both projects would (if available) not have been able to retain such flexibility in micro-siting due to the larger scale infrastructure requirements.
ISH - Item 5 - Scope of the proposed development				
ISH1_13	5(a)(ii)	Applicants	Confirm how many car parking spaces at the North Beach car park will remain available whilst the construction compound is in place [Work Nos 38A and 38B).	The Applicants have responded to this Hearing Action Point in annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (S_D1_5.3).

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			The expectation is that this will be more than 75.	
ISH1_14	5(a)(ii)	Applicants	Provide an indicative plan setting out a) the position of exit pits at landfall; b) the indicative positions and heights of cofferdams; and c) an indicative layout of the beach works including proposed crossing points and restrictions on public access.	The Applicants have responded to this Hearing Action Point in annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (S_D1_5.3).
ISH1_15	5(a)(ii)	Applicants and Blackpool Council	Engage with each other concerning the use of Starr Gate and provide an update.	<p>The Applicants met with Blackpool Borough Council on Thursday 8 May to discuss traffic and transport matters and provide general clarifications on the Morgan and Morecambe Transmission Assets application.</p> <p>The Applicants provided a clarification and commitment to Blackpool Borough Council that, although the application assessed the potential to use Starr Gate as a construction access for HGVs to support the installation of the landfall works, the Applicants will not use Starr Gate for HGV access.</p> <p>The Applicants have identified a potential need for small vessels, such as rigid inflatable boats (RIBs), to be launched during construction activities to support the landfall works. Access to St Annes Beach in the event of an emergency during construction works would also be required.</p> <p>To facilitate this, the Applicants propose that access could be taken from the existing boat ramp from Starr Gate (to the south of the Blackpool Tram depot). Access would be infrequent and only required by light vehicles (e.g. a 4x4 towing a trailer).</p> <p>To manage the potential for any conflict on the boat ramp and Starr Gate, drivers would be required to travel with a banksperson. The banksperson would be responsible for managing traffic and non-motorised users to ensure that the boat can traverse down the ramp. These commitments have been added to an updated version of the outline Construction Traffic Management Plan (APP-211). This updated version has been submitted to Blackpool Borough Council (and other highway authorities) at Deadline 1 for review and comment, with the intention of submission into Examination at Deadline 2.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				A meeting with the Royal National Lifeboat Institution was held on Monday 12 May to provide the same update regarding the use of Starr Gate, which was well received.
ISH1_16	5(a)(ii)	Applicants	Provide an explanation as to the timings for the cable pull at landfall.	The Applicants have responded to this Hearing Action Point in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (S_D1_5.3).
ISH1_17	5(a)(iii)	Applicants	Provide a time estimate for the construction works on either side of the care home.	The Applicants have responded to this Hearing Action Point in Annex 5.3 to the Applicants response to Hearing Action Points: ISH1 13, 14, 16, 17 (S_D1_5.3).
ISH1_18	5(a)(vi)	Applicants	Provide a note as to the likely time duration and the extent of the impacts on the Blackpool Road recreation ground.	The Applicants have responded to this Hearing Action Point in document Applicants response to Hearing Action Points: ISH1 18: Blackpool Road Recreation Ground – Summary of impacts (S_D1_5.4).
ISH1_19	5(a)(ix)	Applicants	Provide details of the agreement with National Grid for connection at Penwortham and also the correspondence requiring one project to connect to the west and the other to the east.	The Applicants have responded to this Hearing Action Point in Annex 5.2 to the Applicants response to Hearing Action Points ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2).
ISH1_20	5(a)(vii)	Applicants	Provide a note explaining the footprints for the two onshore substations which also compares the size and footprint of the Morgan and Morecambe application with other DCO applications with examples being the applications at Dogger Bank A and B and Hornsea One and Two and also Moor Vannin D.	The Applicants have responded to this Hearing Action Point in Annex 5.5 to the Applicants response to Hearing Action Points: ISH1_20: Comparable Onshore Substation Platform Footprints.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
ISH1_21	5(a)(vii)	Applicants	Clarification on the AOD heights for both substations including the lightning rods.	<p>The Applicants note that Requirements 5(1)(a), 5(b) and 5(d) in Schedules 2A and Requirements 5(1) parts (i), (ii) and (iii) in Schedule 2B of the draft DCO (AS-004) state that maximum heights (including buildings, external electrical equipment and lightning rods) are limited specified by metres Above Ordnance Datum (AOD). This is a drafting error and maximum heights should be specified as 'above finished ground level'. The draft DCO (C1 F03) submitted into the Examination at Deadline 1 will include this correction.</p> <p>Table 3.26 of Volume 1, Chapter 3: Project Description of the Environmental Statement (AS-024) states that the maximum main building height of the onshore substations is 15 m for the Morgan Offshore Wind Project and 13 m for the Morecambe Offshore Windfarm, with a maximum lightning protection height of 30 m. The Applicants confirm that all heights presented in Table 3.26 are in reference to height above finished ground level and no permanent infrastructure within the substation footprints will exceed 30m above finished ground level. For example, if the height of the Morgan Offshore Wind Project onshore substation main building is the maximum height of 15 m, lightning rods that are required on the main buildings could be no more than 15 m in height, ensuring the combined total height does not exceed the 30 m maximum height of lightning protection as defined in Requirement 5(d) of Schedules 2A and 2B of the draft DCO (AS-004).</p>
ISH1_22	5(b)	Applicants	Applicants to review the Project Description chapter [AS-024] to provide clarification about "maximum" design parameters and reduce some of the adjectives which suggest wider flexibility. Provide examples and explain how the approach aligns with the Rochdale Envelope.	<p>The Applicants have adopted the Project Design Envelope (PDE) approach, also known as the Rochdale Envelope approach, as further explained in Section 3.4 of the Project Description (AS-024). This approach complies with the guidance within PINS Advice Note Nine: Rochdale Envelope. This approach provides maximum and minimum design parameters ensuring that the worst-case scenarios are identified and assessed in the Environmental Impact Assessment (EIA). The use of the PDE approach thus defines the clear boundaries (whilst retaining necessary project parameter flexibility) within which the final design of the Transmission Assets development must comply.</p> <p>A practical example of the Rochdale Envelope / PDE approach is the offshore cable burial depth. Table 3.6 within the Project Description (AS-024) defines both a minimum and maximum burial depth range between 0.5 – 3 m, where an "indicative" target depth of burial is also provided in Section 3.12.5.3 of 1 m. This range is necessary to accommodate flexibility during detailed design, informed by geotechnical surveys to determine ground conditions and cable burial risk assessments (CBRAs), noting that an</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>outline CBRA was provided with the application, APP-219, as the cable route will encounter various seabed conditions and fishing activities posing site specific engineering challenges and threats to cable exposure/damage. By defining minimum and maximum burial depth parameters, the Applicants can ensure that the EIA has assessed the potential impacts, with an “indicative” target burial depth provided for clarity and to further aid the EIA.</p> <p>The Applicants acknowledge the use of ‘indicative’ and ‘approximate’ maximum / minimum values throughout the Project Description Chapter (AS-024) but highlights that any reference to maximum / minimum values are in fact absolute values. The use of indicative and approximate maximum / minimum will be clarified throughout in an update to the Project Description (AS-024) to be submitted at Deadline 2.</p>
ISH1_23	5(c)	Applicants	Clarify the position over phasing and under what circumstances more than one stage could be progressed. Confirm where in the draft DCO this is covered.	<p>The Applicants have taken an approach to staging that is very standard for linear projects as explained below.</p> <p>The draft DCO (Rev F03) (document reference C1) (has been structured to facilitate each project being built out in stages which means works for each project could be grouped together to facilitate discharge of requirements. This approach is recognised in the Planning Inspectorate's Advice on Preparing Applications for Linear Projects (published February 2025) and is also reflected in multiple DCOs with linear connections including the joint Triton Knoll Electrical System and Sheringham and Dudgeon Extension Projects DCO.</p> <p>The ability to construct each project in stages is not the same as ‘phasing’ in the way that phasing of a scheme might apply in the context of a residential led mixed use development where outline planning permission is granted under the Town and Country Planning Act 1990 where one part or area could be built and the developer may or may not build out further phases. This approach is referred to as a ‘phase’ or ‘phasing’ below.</p> <p>For each set of transmission assets, it is not the case that only part of each project will be built, or that any stage will be delayed indefinitely or that construction of either set of transmission assets would proceed without the generation assets being constructed. All elements of each project's transmission assets authorised development are required to deliver energy from the generation assets and once works for each set of transmission assets infrastructure is commenced, they will be completed in order that each offshore wind farm can become operational.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>For consistency and as further recognition that all parts of Project A will be constructed in one overall phase and all parts of Project B will be constructed in one overall phase, the Applicants have amended Requirement 3 of Schedule 2A to include an additional paragraph (4) which states that "The stages of construction referred to in sub-paragraph (2) will not permit Project A to be constructed in more than one overall phase." The equivalent amendment has been made to Schedule 2B in respect of Project B.</p> <p>In addition, to provide further clarity around staging of works and the use of the term in the draft Development Consent Order, the Applicants have included the following definition of "stage" in Article 2:-</p> <p>"stage" means-</p> <p>(a) For Project A, a part of the Project A onshore works identified as a stage in a written scheme approved under requirement 3 of Schedule 2A; and</p> <p>(b) For Project B, a part of the Project B onshore works identified as a stage in a written scheme approved under requirement 3 of Schedule 2B;</p> <p>This definition follows recent drafting included in other offshore wind DCOs including Rampion 2, East Anglia One North and East Anglia Two.</p>
ISH1_24	5(c)	Applicants	Provide an indicative programme which shows sequential construction with a 4 year gap, to be included in any update to the project description chapter.	The Applicants have provided the indicative programme showing the sequential construction with a 4 year gap below in Appendix B – Applicants' response to ISH-24 below.
ISH1_25	5(d)	Applicants	Explain in outline terms how the applicants have sought to avoid potential environmental and community impacts in the co-ordinated design with regard to the approach taken to the number and location of the proposed substations, along with policy justification.	The number of the proposed substations is driven by the fact that each generating station requires its own dedicated onshore substation, so the Transmission Assets comprise two onshore substations. The need to maintain independent deliverability as a result of electrical separation means a single larger joint onshore substation (i.e. only one onshore substation for both projects) is not a suitable option (see ISH1_12). One onshore substation for both projects was also not recommended within the HND which noted that each project should have an electrically separate connection (which requires each project to have its own onshore substation). The necessary electrical independence of the projects means that a separate onshore substation is required for both the Morgan

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>Offshore Wind Project: Transmission Assets and the Morecambe Offshore Windfarm: Transmission Assets (see further response to ISH1_28).</p> <p>The NPSs set out the Government's view that coordination will have environmental and community benefits (drawing on evidence including the HND and OTNR) – e.g. Paragraph 2.13.4 of EN-5 states:</p> <p><i>“Co-ordinated transmission proposals, including multi-purpose interconnectors and other types of offshore transmission (see Glossary), are expected to reduce the overall environmental and community impacts associated with bringing offshore transmission onshore compared to an uncoordinated, radial approach.”</i></p> <p>Details on the coordinated approach to the Point of Interconnection and the associated onshore cable routes are explained in HAP ISH1 6, 8, 9 , 19, 26 & 28 (S_D1_5.2).</p> <p>The Applicants have not sought to work individually and separately and propose and justify a <i>“radial offshore transmission to single windfarms”</i>, because – in terms of NPS EN-5 2.13.9 – the Applicants considered it was <i>“feasible”</i> (albeit challenging) to work together to deliver the vision for strategic coordination in the HND (See Section 3.5 of S_D1_5.2). The NPSs require Applicants to justify if they are departing from the findings of the HND or proposing a radial connection to a single windfarm. This is not the case here (noting that paragraph 2.13.18 is directed at <i>‘those projects not covered by the strategic network planning by the ESO’</i> e.g. those not included in the HND).</p> <p>In adopting and delivering on the recommendations of the HND, the Transmission Assets receives substantial policy support in terms of the approach taken to coordination:</p> <p><i>“It is recognised that proposed projects which have progressed through strategic network design exercises have been considered for strategic co-ordination through those exercises.”</i></p> <p>However, the Applicants also wholly endorse Government's position that co-ordination of connection infrastructure to offshore windfarms brings overall benefits, including to the environment and communities, a key reason why the Applicants accepted and agreed with the findings of the HND.</p> <p>Although the NPSs do not require those proposing co-ordinated schemes to justify their co-ordination (this is only for projects proposing radial schemes to single windfarms), the Applicants consider there will be clear benefits from the co-ordination proposed. These</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>benefits are set out for the project as a whole in response to HAP ISH1 6, 8, 9 , 19, 26 & 28 (S_D1_5.2) and specifically for the substation locations as follows:</p> <ul style="list-style-type: none"> • The Transmission Assets has a coordinated and aligned site selection process (see response to ISH1_12). If each project proposed a separate and independent radial connection, this would result in two separate disassociated site selection processes with limited awareness of decisions made by the other promoter leading to disparity in constraints considered, different BRAG scoring, and differing definition of land parcels. • The Transmission Assets have aligned their guiding principles for site selection to coordinate the location of infrastructure. If each project proposed its own radial connection for their onshore export cables to independently located onshore substations, the cable routes would be spread across the landscape to their respective onshore substation locations with the onward 400 kV cables both needing to go to Penwortham National Grid substation. There would have been no alignment of guiding principles for siting infrastructure and limited awareness of decisions made by the other project resulting in dis-jointed impacts across a wider area, with more extensive effects on communities. As stated above, each project's infrastructure would be as far as possible from the other to avoid interactions and potential cumulative effects, thereby proliferating infrastructure across a larger area and across multiple communities. • The Applicants have an aligned land strategy for the projects. If each project was being developed separately with the same Pol at Penwortham and due to the competitive nature of land process, each developer would likely be seeking to secure larger areas to protect their development from the other, resulting in greater impacts and land take • There is one DCO application for the Transmission Assets. If not coordinated, each project would have prepared and submitted their own DCO application for its separate radial connection with its own documentation and EIA. This would have resulted in twice the volume of documentation, differing EIA assessment, and differing approaches to mitigation which is likely to overwhelm already constrained local authority / stakeholder resource. • The Applicants, along with the respective Generation Assets, have undertaken a coordinated engagement approach. If uncoordinated, then each project would have separate project engagement with landowners, communities and stakeholders

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>resulting in consultation fatigue and confusion in the local community over different developer messages around different projects being promoted at the same time.</p> <p>The Applicants' approach of not seeking independent and separate radial connections and coordinating site selection and location of the onshore substations, has resulted in minimising environmental and community impacts for all the reasons outlined above, and avoided infrastructure proliferation in line with NPS EN-5.</p> <p>In terms of the site selection itself for the onshore substations, further details can be found above in ISH1_10 (explaining the approach to the 8km area of search), ISH1_12 (explaining the substation site selection methodology which identified their locations including compliance with policy such as the Horlock Rules endorsed in 2.9.18 of EN-5), and ISH1_7 (explaining the approach to the BRAG assessment).</p>
ISH1_26	5(d)	Applicants	Provide a high-level note setting out the benefits that will be realised through the collaboration of the applicants for the proposed development as required by NPS policy.	The Applicants have responded to this Hearing Action Point in Annex 5.6 to the Applicants response to Hearing Action Points: ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2).
ISH1_27	5(c)	Applicants	Clarify if the proposed construction periods of 36 months and 30 months for the separate projects is controlled in any way.	The construction durations for each element of the Transmission Assets are presented in Table 3.4 of the Project Description (AS-024). The overall construction durations, 36 months for Morgan OWL and 30 months for Morecambe OWL, form the basis upon which the Environmental Impact Assessment (EIA) has been conducted. These durations inform the parameters assessed as part of the Rochdale Envelope approach (as further described in Section 3.4 of the Project Description (AS-024)), defining the worst-case scenario of the construction programme within the EIA. Therefore, extending the construction period beyond the assessed durations would fall outside the assessed project envelope, meaning such activities would not be permissible under the current consent sought by the Applicants.
ISH1_28	5(d)	Applicants	Provide a note explaining the consequences of separate companies promoting the two wind farms and comment on	The Applicants have responded to this Hearing Action Point in Annex 5.6 to the Applicants response to Hearing Action Points ISH1 6, 8, 9, 19, 26 & 28 (S_D1_5.2).

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			the differences between this project and other projects (including the Sheringham and Dudgeon DCO) in terms of the composition of the applicants' corporate structure.	
ISH1_29	5(d)	Applicants	Provide an update on other similar projects in the area on a similar timeline and provide an updated cumulative effects assessment at D1. The applicants will also provide an update of any other DCO applications.	<p>The Applicants have provided a "Report on Interrelationships with other infrastructure projects" at Deadline 1, which summarises the status of other similar projects in the area on a similar timeline (S_D1_7). The report considers the potential interrelationships with the following projects:</p> <ul style="list-style-type: none"> • Awel y Mor; • Mona Offshore Wind Project; • Morgan Offshore Wind Project: Generation Assets; • Morecambe Offshore Windfarm Generation Assets; • Mooir Vannin Offshore Wind Farm; and • East Irish Sea Transmission Project. <p>This report will be updated throughout the Examination, at Deadline 4 and Deadline 6, as stated in Appendix D of the Rule 6 letter (PD-006) and will consider updated information in the public domain at the time, e.g. Mooir Vannin Offshore Wind Farm Application once accepted. This follows on from a similar report requested by the Planning Inspectorate for the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets Examinations.</p> <p>The Applicants have reviewed other projects, plans and developments, using the methodology set out in ES Volume 1, Annex 5.5: Cumulative screening matrix and location plan (APP-039) and provided an updated Cumulative screening matrix and location plan at Deadline 1 (Document reference: F1.5.5/F02). This matrix provides an updated screening for the Transmission Assets, to be considered within the updated Cumulative Effects Assessment (CEA), including any other DCO Applications submitted to the Planning Inspectorate since submission of the Application in October 2024. An updated CEA will be provided at appropriate deadlines.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
ISH1_30	5(f)	Applicants	Explain the implications of a reduction of Saturday working hours (from 07:00-19:00 to 07:00-13:00) on an individual stage of the authorised development and overall duration of the programme.	<p>If the working hours on Saturday were limited to 13:00 instead of 19:00, the construction efficiency for one sixth of the working week would be significantly reduced. By the time mobilisation and demobilisation periods for plant and machinery, mandatory safety briefings, and legally required rest breaks are considered, the available working time on-site on a Saturday becomes minimal. Additionally, contractors may forego Saturday work entirely due to the aforementioned inefficiencies as a result of a shortened working window leading to potentially longer construction durations in localised areas along the onshore cable corridor.</p> <p>While the overall maximum assessed construction duration of 36 months for the Morgan Offshore Wind Project and 30 months for the Morecambe Offshore Windfarm may remain unchanged, restricting Saturday afternoon working would mean individual work locations (potentially defined by Requirement 3 (Stages of authorised development) of the draft DCO (AS-004)) would require longer construction periods. As a result, communities along a specific section of the route would experience construction impacts over an extended timeframe.</p> <p>The Applicants consider that Saturday afternoon working provides substantial benefits, including the efficient delivery of localised construction activities and therefore less overall disruption to local communities and landowners.</p>
ISH1_31	5(g)	Applicants	Provide a schedule of benefits for the local community as the main documents (such as the Planning Statement and the Statement of Reasons) currently concentrate on national with little reference to local benefits. Engagement will take place with the relevant councils and also the newly formed Transmission Assets Steering Group.	<p>The Applicants have updated the Statement of Reasons (Reference number D2 F03), which now includes information on local community benefits to be realised as a result of the Transmission Assets, in particular:</p> <ul style="list-style-type: none"> • Community Funds for Transmission Infrastructure • Outline Employment and Skills Plan and potential employment opportunities • Contracts for Difference (CfD) process • Biodiversity benefit <p>To ensure the benefits of the Transmission Assets can be realised at a local level, further engagement around community benefits will be undertaken by the Applicants with key local stakeholders who fall within the order limits of the Transmission Assets. Key local stakeholders will include, but not be limited to, local authorities, parish, community and/or town councils, elected representatives, as well as the newly formed Transmission Assets Steering Group.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
ISH - Item 6 - Scope and content of the applicants' assessments				
ISH1_32	6(a)	Applicants	Submit a technical note which explains the relationship between the proposed removal of high order unexploded ordnance clearance from the deemed marine licence in the draft DCO and the requirements for restrictions during fish spawning seasons.	<p>The Applicants have assessed the behavioural effects of UXO clearance (both high order and low order) on fish spawning (including herring and cod) in section 3.11.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-048); behavioural effects have the greatest potential to affect spawning behaviour which may in turn affect spawning success. This assessment concluded that behavioural effects on fish spawning would be extremely short term and would not lead to significant effects; as such, no further mitigation, such as seasonal restrictions, were deemed necessary.</p> <p>As set out in response to the MMO Relevant Representation (see PDA-013; response to 4.4.5), temporal overlap between UXO clearance and spawning periods was predicted to be minimal because of the extremely short-term nature of the noise associated with UXO clearance activities, i.e. the noise emissions would last a few seconds and fish behaviour would return to baseline immediately following clearance, with no effect on fish spawning. Furthermore, there is no overlap of herring spawning habitats within the Order Limits (see paragraph 3.6.3.2 of Volume 2, Chapter 3: Fish and shellfish ecology; APP-048) and as such, UXO clearance was not predicted to affect herring spawning grounds.</p> <p>Despite the EIA predicting no significant effects on fish spawning, the Applicants have updated the draft DCO at Deadline 1 to restrict any UXO clearance to low-order techniques in line with the updated joint position paper from UK government departments, devolved governments and SNCBs¹. The removal of high order UXO clearance will result in the effect of UXO clearance on fish spawning being considerably reduced from the Maximum Design Scenario assessed within the ES. This can be demonstrated by comparison of the fish injury ranges for high order and low order UXO clearance (see Table 3.17 of Volume 2, Chapter 3: Fish and shellfish ecology; APP-048). These demonstrate that low order clearance considerably reduces injury effects to the range of tens of metres from the source (i.e. 27-44 m based on clearance using a 0.08 kg donor charge as compared to ranges of up to 985 m for high order clearance). While equivalent ranges are not available for behavioural effects (due to the lack of defined, published thresholds), an equivalent scale of reduction in behavioural effects will occur</p>

¹ <https://www.gov.uk/government/publications/marine-environment-unexploded-ordnance-clearance-joint-position-statement/marine-environment-unexploded-ordnance-clearance-joint-position-statement>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>due to the reduced noise entering the marine environment. Combined with the extremely short term nature of UXO clearance, the Applicants' commitment to the use of low order UXO clearance will ensure that effects on fish spawning will be extremely short term duration, of limited spatial scale and highly reversible and therefore will not lead to significant effects. As such, a seasonal restriction on these activities is not appropriate or proportionate.</p> <p>Mitigation measures to minimise effects of UXO clearance on marine mammals (and therefore also on fish species) are set out in the Outline Marine Mammal Mitigation Protocol (MMMP; APP-223; Note an update to this outline plan will be submitted into Examination at Deadline 2). Should high order UXO clearance be required, consent for this will be sought from the MMO under a separate marine licence. High order clearance would only be needed in the following circumstances, in line with the aforementioned UK government position statement:</p> <ul style="list-style-type: none"> • The most appropriate low noise method has failed after a minimum of three attempts; • All best practice has been demonstrably applied; and • There is prior agreement with the appropriate licensing authority. <p>This prior agreement would be the separate high order UXO clearance marine licence.</p>
ISH1_33	6(a)	Applicants Natural England	Provide an update on discussions with Natural England on mitigation to ensure there is no adverse effect on the integrity on the Liverpool Bay Special Protected Area (SPA) and the Ribble and Alt Estuary SPA.	<p>The Applicants can confirm that they met with Natural England on 28 April 2025 to discuss potential ornithological impacts associated with the Ribble and Alt Estuaries SPA/Ramsar site and Liverpool Bay SPA. Following on from the meeting, the Applicants are preparing further information to aid Natural England in agreeing that there are no Adverse Effects on Integrity of the Ribble and Alt Estuaries SPA and Ramsar site and Liverpool Bay SPA. However, the Applicants consider that the mitigation can be developed, and that an in-principal derogation case is not required for Liverpool Bay SPA or the Ribble and Alt Estuaries SPA/Ramsar Site. The Applicants are committed to engaging with Natural England on this matter to help resolve their concerns and anticipate being able to provide a further update at Deadline 3, to demonstrate the progress made between the parties.</p>
ISH1_34	6(a)	Applicants	Provide the applicants' without prejudice Stage 2 Measures of Equivalent Environmental	<p>While the Applicants maintain that a Stage 2 MCZ assessment is not required, the Applicants have submitted a 'Without Prejudice' Measures of Equivalent Environmental Benefits (MEEB) case for the Fylde Marine Conservation Zone (MCZ) as an appendix to</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			Benefits (MEEB) case for the Fylde Marine Conservation Zone.	the Stage 2 MCZ Assessment - Alternatives and the public benefit test document (S_D1_9) at Deadline 1.
ISH1_37	6(b)	Applicants	Explain where water for construction of the proposed development will be sourced. If this is to be brought to site by tankers on any or all sections of the works then clarify whether these movements have been taken into account in construction trip generation assumptions (APP-115).	<p>The Applicants can confirm that HGV movements for import of liquids such as drill fluid are included within Appendix A: Material Requirements Per Section (Onsite Deliveries / Offsite Removal) of Volume 3, Annex 7.5: Construction Trip Generation Assumptions of the ES (APP-115) for the Morecambe Offshore Wind Farm and Morgan Offshore Wind Project. This can be evidenced from APP-115, Appendix A. The volume of fluid per delivery vehicle is stated at 30,000 litres per delivery. An explicit example of water deliveries being included is provided at pdf page 26 of APP-115.</p> <p>The number of deliveries required are included within the calculated number of HGV movements per activity (for example, long / moderate HDD drilling compound). The estimate of water deliveries required within each activity are based on a realistic worst-case assumption of provision of drill fluid required for drilling.</p> <p>The Applicants note that drill fluid water would compromise the predominate requirement for water delivery for a project of this nature, and supplementary water deliveries e.g. in relation to use of portable water for facilities at temporary construction compounds would be incidental and captured as part of the miscellaneous allowances applied to the HGV numbers. An example of the application of this allowance can be evidenced at pdf page 45 of APP-115.</p> <p>The Applicants can confirm Volume 3, Chapter 7: Traffic and Transport of the ES draws upon the information contained within APP-115 to support the assessment.</p>
ISH1_38	6(b)	Applicants	Commitment 37 restricts vehicle movements associated with the operation and maintenance of the proposed development to 07:00 and 23:00 hours. Provide an explanation for such long hours and why the work cannot be restricted to between 09:00 and	<p>The Applicants acknowledge that vehicle movements associated with the operation and maintenance of the Transmission Assets indicate extended working hours. Following a review of the likely required operation and maintenance activities associated with the Transmission Assets, the Applicants have committed to a reduction of these hours. The vehicle movements associated with the planned operation and maintenance hours will be updated from 07:00 – 23:00 to 07:00 – 19:00. An update to the Commitments Register (AS-030) will be submitted at Deadline 2.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			17:00 with an exception for emergencies.	
ISH1_39	6(c)	Applicants	Explain the site selection for the mitigation areas and biodiversity benefit areas including additional detail on those areas such as target species.	The Applicants can confirm that they have had a meeting with Blackpool Airport on 15 May 2025 and BAE Systems on 19 May 2025, one of the topics discussed was the site selection for the mitigation areas. Further detail on the site selection for the mitigation and biodiversity benefit areas will be submitted at Deadline 2.
ISH1_40	6(c)	Applicants	In relation to bird strike provide an update with reasons of why safeguarding assessments are not being provided.	<p>The Applicants can confirm that Warton Aerodrome ("the Aerodrome") is responsible for the technical safeguarding of their Obstacle Limitation Surfaces (OLS) and Communications Navigation and Surveillance (CNS) systems in accordance with the Civil Aviation Authority (CAA) requirements.</p> <p>To this end, any safeguarding assessment to be undertaken in relation to bird strike and penetration of the OLS ceiling height is the responsibility of BAE Systems to demonstrate compliance with their CAA licence / requirements.</p> <p>BAE Systems confirmed during ISH1 Agenda item 6(c) that safeguarding assessments are to be undertaken by BAE Systems on behalf of Warton Aerodrome. The need for potential bird strike mitigation requirements was not raised during pre-application consultation and was identified at submission in BAE Systems's Relevant Representation (RR-208).</p> <p>The Applicants are committed to working with BAE Systems to provide them with the necessary information to undertake all aspects of their safeguarding assessment, including details for bird strike mitigation and will do so as part of continued engagement throughout the Examination.</p> <p>The Applicants are confident that there will be no effect regarding Obstacle Limitation Surfaces (OLS) and Communication, Navigation and Surveillance (CNS) systems from the Morecambe and Morgan onshore substations. The substations are in close proximity to existing 132kV overhead line pylons which are approximately 42 m above ground level. This far exceeds the maximum above finished ground level height of the onshore substations including lightning protection masts of 30 m.</p> <p>The Applicants are working with BAE Systems regarding appropriate mitigation for potential bird strike associated with the ecological mitigation areas required to</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				compensate for temporary displacement effects arising from the construction of the onshore cable corridor. An update on the engagement with BAE Systems has been included within the Cover Letter for Deadline 1 (S_D1_1).
ISH1_41	6(c)	BAE Systems	Provide an update on any progress with the various matters listed in their closing submission to this Examination which were outstanding as at 10 March 2025 of the connected Morgan Offshore Wind project.	<p>BAE Systems closing submission is set out in REP6-096 of the Morgan Offshore Wind Project: Generation Assets ("Morgan Generation Assets") Examination. BAE Systems also submitted a further representation (REP7-018) at the close of the Examination. Outstanding matters set out in those submission relate to:</p> <ol style="list-style-type: none"> 1. Instrument Flight Procedures (IFP), Minimum Sector Altitude (MSA), Direction Finding and radio communications (Communication, Navigation and Surveillance (CNS) systems) at Walney Aerodrome and Warton Aerodrome 2. Operation of primary surveillance radar (PSR) and the air traffic control operations at Warton Aerodrome 3. Agreement over the specific wording of requirements secured within the Draft DCO associated with points 1 and 2 above. <p>The Examining Authority should also be aware that BAE Systems have raised similar matters in their closing submission to the Morecambe Offshore Windfarm: Generation Assets ("Morecambe Generation Assets") Examination (see REP6-069).</p> <p>The potential impact pathways associated with points 1 and 2 above relate to the operation of the offshore wind turbines and the potential effects in the air space above and around the offshore wind farm array areas. Point 3 relates to disagreement over the specific wording of requirements included in the draft DCO's included to secure implementation of mitigation against any effects on points 1 and 2 above.</p> <p>The Applicants note that whilst there are outstanding matters relating to establishing the full scope of potential effect, and/or mitigation requirements, the Applicants of both generation assets DCO applications have secured appropriate requirements for Air Traffic Services (ATS) in their respective draft DCOs for the benefit of BAE Systems' Walney and Warton Aerodromes based on existing DCO precedent. The determination of the appropriateness of these requirements are now matters for the Morgan and Morecambe Generation Examining Authority recommendation reports and the Secretary of State for Energy Security and Net Zero's decision. Whilst the wording of the PSR requirement remains as an ongoing point of discussion for both generation assets DCO</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>applications, Morecambe Generation Assets has made good progress with BAE Systems with wording of the requirement now largely agreed, as noted within BAE Systems closing statement (see REP6-069).</p> <p>The Applicants would also note that there are no inter-related effects between the outstanding matters relating to potential effects in the air space above and around the offshore wind turbines on Morgan Generation Assets and Morecambe Generation Assets and the Morgan and Morecambe Transmission Assets. There is no impact pathway for potential effects on IFP/MSA or CNS systems from the installation, operation and maintenance or decommissioning of the offshore and onshore export cables for either Walney or Warton Aerodromes. BAE Systems confirmed during ISH1 Agenda item 6(c) that safeguarding assessments are to be undertaken by BAE Systems on behalf of Warton Aerodrome to determine the potential for effect of the onshore substations on CNS. However, the Applicants are confident that there is no effect as the onshore substations are in close proximity to existing 132kV overhead line pylons which are approximately 42 m above ground level. The maximum above finished ground level height of the onshore substations is well below this at 30 m for the lightning protection masts, as set out in the Applicants' response to ISH1_40.</p>
ISH1_42	6(c)	Blackpool Airport	Provide a technical note on the CA-791 process.	
ISH1_43	6(d)	National Farmers Union (NFU)	Provide a list of the parties that the NFU represents for this Project.	
ISH1_44	6(d)	Applicants	Submit the Applicants' response to the additional submission by the NFU (PDA-041).	The Applicants have responded the NFUs procedural deadline submission, document reference S_D1_12_The Applicants' Response to Procedural Deadline A Submissions by Interested Parties.
ISH1_45	6(d)	Applicants	Provide a note explaining how the applicants' soil surveys meet the tests at paragraph 5.11 of NPS EN-1 and give examples of other DCO	The Applicants have responded to this Hearing Action Point in Annex 5.7 to the Applicants response to Hearing Action Points: ISH1 45 (S_D1_5.7).

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			projects that have taken the same approach as the applicants.	
ISH1_46	6(d)	Applicants	Provide a series of plans showing the distribution of land holdings within the order limits.	<p>The Applicants have prepared a set of plans showing the distribution of land holdings based on the information available to the Applicants document reference S_D1_4.8</p> <p>The plans provided by the Applicants illustrate the distribution of landholdings within the Transmission Assets Order limits (shown outlined in red). These plans indicate that there are 51 agricultural holdings that fall within the Order limits. The information depicted on the plans represents the extent of the holdings based on information obtained from HM Land Registry (HMLR) that has formed the extent of the land referencing undertaken by the Applicants and has been supplemented with information from the Applicants diligent inquiries with landowners. It is therefore possible that there is additional land under different titles outside the Applicants' land referencing boundary which the Applicants are not aware of but forms part of these landholdings.</p> <p>The Applicants are aware that there are different types of agricultural and rural business across the Transmission Assets order limits, including dairy, beef, mixed livestock, arable, mixed and equine. These businesses all have slightly differing farming calendars throughout the seasons and therefore the use and timings of activities on the land differ.</p> <p>It should be noted that the 51 landholdings shown are not representative of ownership.</p>
ISH1_47	6(e)	Applicants	Provide clarification in response to points raised by the NFU on post construction landowner drainage requirements.	<p>The specific query raised by the NFU at Issue Specific Hearing 1 under agenda Item 6(e) concerned how future field drainage works, that may require crossing of installed onshore export and 400kV grid connection cables, could be accommodated once the project is operational.</p> <p>The Applicants can confirm that once the projects are operational, normal agricultural practices and drainage works can continue without prior consent to a depth of 0.6m, as secured under Schedules 8A and 8B of the draft Development Consent Order (AS-004). For drainage works or installation that needs to exceed this depth and cross the installed cables, landowners or the Land Drainage Contractor would be required to contact the undertaker for approval. This ensures the protection of both the cables and agricultural land drainage systems.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
ISH1_48	6(e)	Applicants	Report the progress of discussions with the Lead Local Flood Authority in relation to their relevant representation, as presented during item 6(e).	<p>The Applicants met with the Lead Local Flood Authority (LLFA) on 24 April 2025 to discuss responses to their Relevant Representation (RR-1262.10) changes needed to the wording of the Protective Provisions within the draft DCO (AS-004). The Applicants are preparing updated draft Protective Provisions to reflect the discussions had during this meeting. The Applicants believe there are limited points of discussion remaining and anticipate that the Protective Provisions can be agreed during the Examination.</p> <p>The Applicants are in the process of arranging a follow-on meeting to further address other matters in the LLFA's Relevant Representation (RR-1262.9, RR-1262.11 and RR-1262.12) including potential impacts on flood risk areas and further documentation requested by LLFA. The Applicants are confident that all matters can either be agreed and / or adequately addressed through the Examination.</p>
ISH1_49	6(e)	Applicants	Report on progress of discussions with the Environment Agency in relation to their relevant representation, as presented during item 6(e) of ISH1.	<p>The Applicants met with the Environment Agency on the 24 April 2025 to discuss responses to their Relevant Representation (RR-677). Discussions focused on concerns including the disapplication of Flood Risk Activity Environmental Permit (FRAPS), dewatering at the Transition Joint Bays (TJB), requirements securing Hydrogeological Risk Assessment and Foundation Risk Assessment, timescales for approval of matters specified in requirements, and the requested amendments to Requirements 4, 6 and 12 of the draft DCO (AS-004).</p> <p>The Applicants provided clarifications on the referenced Requirements 4, 6 and 12 of the draft DCO at the meeting with the Environment Agency on 24 April 2025 and will be providing additional information to the Environment Agency to support ongoing dialogue. The Applicants will also share and discuss the outcomes of a Preliminary Hydrogeological Risk Assessment with the Environment Agency in advance of submission into the Examination at Deadline 3. Both parties are maintaining a collaborative approach, with further meetings scheduled to progress outstanding matters.</p>
ISH1_50	6(g)	Applicants	Provide a clear annotated version of the tithe base map together with explanations concerning the Quaker Burial Ground (Appendix G(10) of APP-097) compared against Sheet 13 of Part 1 of 2 of the	<p>The Applicants have provided an annotated version of the tithe map to illustrate the Work Nos. from Sheet 13 of Part 1 of 2 of the Works Plans – Onshore and Offshore (AS-014). Please see document Annex 5.9 to the Applicants response to Hearing Action Points: ISH1 50 (Document Reference: S_D1_5.9).</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			Works Plans - Onshore and Offshore (AS-014), including provision of the related Work Nos.	
ISH1_51	6(g)	Fylde Borough Council and other Local Authorities	Local authorities to highlight any additional heritage assets to the applicants in advance of the submission of their Local impact Reports.	
ISH1_52	6(i)	Applicants	Provide a note explaining why a more localised report limited to the Fylde area is not necessary. Additionally, how the applicants' assessment of the potential impact on tourism on the extended area of the northwest of England as set out within Volume 4, Chapter 2: Socioeconomics of the Environmental Statement (APP-141) is applicable and whether this accords with The Infrastructure Planning (EIA) Regulations 2017. Reconsider the assessment that the impact on tourism during construction and operation is "negligible" when the area covered is so wide rather than being focused on the local area.	The Applicants have responded to this Hearing Action Point in Annex 5.10 to the Applicants response to Hearing Action Points: ISH1 52 (S_D1_5.10).
ISH1_53	6(i)	Local Authorities	Provide evidence of where projects of this kind have had	

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
			an impact on the tourism economy.	
ISH - Item 7 Draft development consent order (DCO)				
ISH1_54	7(b)	Applicants	Provide page numbers for the table of contents to the draft DCO.	The Applicants have provided an updated draft Development Consent Order at Deadline 1 which includes page numbers in the Table of Contents. Please see draft Development Consent Order (Document reference C1 F03).
CAH1 - Item 3 - Applicant's approach				
CAH1_1	3	Applicants	Provide a note on the cable corridor widths and how this is analogous to other projects, and to what extent is land take proportionate in the context of land take in different construction scenarios.	<p>The Applicants note that the typical standard width of the temporary construction onshore export cable corridor is 62 metres for Morgan OWL and 38 metres for Morecambe OWL, and for the 400kV grid connection cable corridor is 38 metres each for both Morgan OWL and Morecambe OWL. These widths include necessary elements such as a haul road for construction access, separate storage areas for topsoil and subsoil, temporary fencing for safety, as well as the trench and required plant machinery, as detailed in Section 3.15.3 of Volume 1, Chapter 3: Project Description (AS-024).</p> <p>For the permanent onshore 275kV export cable corridor width, it is 45 metres for Morgan OWL and 25 metres for Morecambe OWL, and for the 400kV grid connection cable corridor it is 25 metres each for both Morgan OWL and Morecambe OWL. These reflect fixed engineering and operation constraints such as minimum cable spacing requirements, space needed for joint bays and link boxes, and ongoing access for inspection and maintenance.</p> <p>Regarding the cable corridors in respect to different construction scenarios, the permanent and temporary cable corridor widths for each project will not change depending on whether construction sequencing is either in isolation, concurrent or sequential. This is due to the Morgan OWL and Morecambe OWL being developed by two separate legal entities. Each project must maintain a sufficient corridor width to be able to independently accommodate construction, and maintenance and operational requirements without reliance on coordinated timing or sequencing with the other. The coordination design undertaken by the Applicants is further explained in Annex 5.6 to the Applicants response to Hearing Action Points: ISH1 25, 26 and 28 (S_D1_5.6).</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response																																										
				<p>The table below presents how the cable corridor widths are comparable to other offshore wind projects and confirms that the Applicants' temporary and permanent corridor widths are proportionate and align with standard practices.</p> <table> <tr> <th>Project</th><th>Number of Circuits</th><th>Maximum operating Voltage of the cable circuits</th><th>Temporary Cable Corridor Width (m)</th><th>Permanent Cable Corridor Width (m)</th></tr> <tr> <td rowspan="2">Morgan OWL</td><td>4</td><td>275 kV</td><td>62</td><td>45</td></tr> <tr> <td>2</td><td>400kV</td><td>38</td><td>25</td></tr> <tr> <td rowspan="2">Morecambe OWL</td><td>2</td><td>275kV</td><td>38</td><td>25</td></tr> <tr> <td>2</td><td>400kV</td><td>38</td><td>25</td></tr> <tr> <td rowspan="2">Dogger Bank South OWF</td><td>2</td><td>Not specified</td><td>75</td><td>24</td></tr> <tr> <td>8</td><td>400kV</td><td>100</td><td>34</td></tr> <tr> <td>Sheringham and Dudgeon Extension Projects</td><td>2</td><td>230kV//400kV</td><td>45 (single project) 60 (two projects)</td><td>20</td></tr> <tr> <td>Hornsea 4 OWF</td><td>6</td><td>HVAC – 400 kV</td><td>80</td><td>60</td></tr> </table>	Project	Number of Circuits	Maximum operating Voltage of the cable circuits	Temporary Cable Corridor Width (m)	Permanent Cable Corridor Width (m)	Morgan OWL	4	275 kV	62	45	2	400kV	38	25	Morecambe OWL	2	275kV	38	25	2	400kV	38	25	Dogger Bank South OWF	2	Not specified	75	24	8	400kV	100	34	Sheringham and Dudgeon Extension Projects	2	230kV//400kV	45 (single project) 60 (two projects)	20	Hornsea 4 OWF	6	HVAC – 400 kV	80	60
Project	Number of Circuits	Maximum operating Voltage of the cable circuits	Temporary Cable Corridor Width (m)	Permanent Cable Corridor Width (m)																																										
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Hornsea 4 OWF	6	HVAC – 400 kV	80	60																																										
CAH1_2	3	Applicants	Provide a note explaining that all reasonable alternatives to compulsory acquisition have been explored.	<p>The Applicants have set out in section 6 of their Statement of Reasons (Rev F03) (Document D2) and further clarified at Compulsory Acquisition Hearing 1 (S_D1_4) how all reasonable alternatives to compulsory acquisition have been explored for the Transmission Assets in accordance with paragraph 8 of the 'Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land' (DCLG, 2013) ("CA Guidance"). The Applicants have sought the acquire land only where this is absolutely necessary and has sought to limit the rights it is seeking to those which are the least intrusive which is set out further below.</p>																																										

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>The Applicants have sought to reduce the impact on affected parties and only included permanent acquisition of land where the use of rights or temporary possession is not adequate. Schedules 7A and 7B of the draft Development Consent Order (Rev F03) (Document C1) identify those areas of land over which only temporary possession powers may be exercised.</p> <p>The Applicants have also confirmed that (where voluntary agreements are not reached and it is necessary to rely on compulsory acquisition and temporary possession powers) they will seek to construct the Transmission Assets using temporary possession powers in the first instance and only use permanent powers of acquisition and impose restrictions in respect of the as built area of the cables (see paras 1.10.1.21 of the Statement of Reasons (Rev F03) (document D1) and Article 29(1)(a)(ii) and 29(2)(a)(ii) of the draft Development Consent Order (Rev F03) (Document D2) which facilitate that approach). Land which is only required for construction purposes will be restored to the reasonable satisfaction of the landowner and handed back in accordance with Article 29 and Requirement 16 of Schedules "A and 2B of the draft Development Consent Order (Rev F03) (Document D2). The alternative would be to acquire all the Order land or wide rights over all Order land to undertake the works. This approach is not considered proportionate as it would affect greater areas of land over a longer period than would happen using the temporary possession first approach to construction works.</p> <p>The Applicants further note that they have put forward appropriately tailored permanent rights packages for each set of works which ensure that normal agricultural activity can resume post-construction over the permanent cable easement. These work packages are identified against the relevant plots of land in Schedules 8A and 8B of the draft Development Consent Order (F03) (Document D2). This ensures there are no unnecessary ongoing restrictions on the use of land post construction. Again, this ensure the Applicants are taking a proportionate approach to the inclusion of and potential use of compulsory acquisition powers.</p> <p>The Applicants confirm that an important consideration of the site selection process was the objective of minimising the need for the compulsory acquisition of interests in land and the extent of that acquisition or interference with the rights of others. The Statement of Reasons (Rev F03) (Document D2) confirms that throughout the pre-application process, the Applicants and the Applicants' land agents engaged with affected landowners (and their agents). This resulted in a number of onshore cable route change proposals, as well as changes to the substation platforms, construction compounds and</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>access tracks have been put forward by those affected by the proposed onshore infrastructure, and the Applicants were able to incorporate a number of those suggestions into refinements of the onshore and landfall infrastructure (as detailed in Volume 1, Annex 4.1: Selection and refinement of cable landfall and Volume 1, Annex 4.3: Selection and refinement of onshore infrastructure of the Environment Statement (document references APP-031 and App-033). Further details of the site selection process were provided at Issue Specific Hearing 1 (S_D1_3) and in responses to Issue Specific Hearing 1 Action Points 7, 10 and 12 and Compulsory Acquisition Hearing 1 Action Point 5 as set out in the Applicant's Response to HAP at Deadline 1 (S_D1_5).</p> <p>As set out at Compulsory Acquisition Hearing 1 (S_D1_4), the Applicants and their agents have been engaging with landowners since July 2022 with a view to securing voluntary agreements wherever possible. Significant effort continues to be put into agreeing a negotiated solution with each of the persons affected by the exercise of compulsory acquisition powers. The Applicants have provided further detail in response to Compulsory Acquisition Hearing 1 Action Point 4 as set out in the Applicant's Response to HAP at Deadline 1 (S_D1_5). The Applicants have also submitted at Deadline 1 an updated Land Rights Tracker (S_D1_16) which provides an update on the progress of negotiations with landowners and occupiers and which will be updated with progress at the requested deadlines throughout the Examination. It is, however, important to recognise that for most linear projects the number of land interests involved means that compulsory acquisition powers will likely be required to deliver each project. Without powers of compulsory acquisition, it may not be possible to secure all of the interests in land necessary to develop the Transmission Assets within a reasonable timeframe. This is recognised in paragraphs 25 and 26 of the CA Guidance which state:</p> <p><i>"Where proposals would entail the CA of many separate plots of land (such as for long, linear schemes) it may not always be practicable to acquire by agreement each plot of land. Where this is the case it is reasonable to include provision authorising compulsory acquisition covering all the land at the outset" and "Applicants should consider at what point the land they are seeking to acquire will be needed and as a contingency measure should plan for compulsory acquisition at the same time as conducting negotiations".</i></p> <p>The Applicants are committed to continuing to seek to secure the necessary land and rights for the Project through voluntary agreements and will continue to do so throughout the examination and beyond if needed. However, given the linear nature of the Transmission Assets project it is not considered that an alternative project would have</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>avoided the need to include compulsory acquisition powers or temporary possession powers. No case has been put by any party that this could be done.</p> <p>As set out in the Statement of Reasons (Rev F03) (Document D2), the Applicants consider that compulsory acquisition powers can be justified as a fall-back to ensure the necessary land and rights are secured to enable development. In the context of clear national and local policy support for the development of the Transmission Assets, the use of compulsory acquisition powers would be a proportionate and legitimate means of securing the necessary interests in land where they cannot be acquired through voluntary agreement.</p>
CAH1_3	3	Applicants	Provide an update to the Lands Rights Tracker (noting Appendix F (4) of the ExA's Rule 6 letter).	The Applicants have provided an updated Land Rights Tracker (document reference S_D1_15_Applicants' Land Rights Tracker).
CAH1_4	3	Applicants	<p>At the date of CAH1 (2 May 2025) none of the affected landowners have agreed heads of terms and several land agents spoke at the hearing on the state of negotiations.</p> <p>Provide a note as to whether sufficient efforts to secure land by voluntary agreement were taken prior to the application being submitted.</p>	<p>The Applicants have been engaging with landowners since July 2022 in relation to landownership and access for surveys. Since this time, the Applicants have written to landowners and their appointed agents requesting feedback through the statutory and non-statutory forums as well as providing updates on the process. The detail and extent of landowner engagement prior to submission is set out in the paragraphs 3.5, 4.2.4 and 4.8.3 of the Consultation Report (APP-170).</p> <p>As set out in the Statement of Reasons (AS-011) the Applicants believe significant efforts have been and continue to be put into negotiating the necessary land rights required to deliver the projects through voluntary agreement.</p> <p>Heads of Term templates were initially issued in Spring 2024 to the land agents with the intention of obtaining feedback and progressing templates as expediently as possible.</p> <p>Following the issuing of the template to the agents, the Applicants have prepared several different sets of heads of terms to account for the various combinations of land and/or land rights sought along the order limits.</p> <p>On the 20th September 2024, the Applicants invited all agents representing landowners and occupiers to attend a meeting where the Applicants provided an overview of the land agreements sought, the structure of the documents and the anticipated timeframes for examination.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>Heads of Term for the land and/or land rights sought were issued to all land interests on the 8th November 2024. The issuing of the Heads of Term prompted engagement from the NFU and subsequently all landowners and occupiers along the order limits were invited to an event on the 4th December 2024 held by the Applicants to discuss land specific matters such as drainage, accommodation works and what can be expected through the examination stage of the project.</p> <p>Since the meeting in December, the Applicants have been discussing the specific Heads of Term with the agents and the NFU to agree a suite of template documents during meetings on the 9th of December 7th of January 21st of February and the 7th of April.</p> <p>It is acknowledged that there are still outstanding points of difference between the Applicants and the agents appointed; however, during the meeting on the 7th April, it was agreed and acknowledged by the land agents that the discussions would move from the land agent forum to individual landowner meetings for the specific details to be agreed on an individual basis. This is the normal process for linear projects. The Applicants remain committed to working with affected parties to reach voluntary agreements on appropriate and reasonable terms wherever possible.</p> <p>The Applicants are in the process of populating all template Heads of Term documents with landowner specific details and anticipate these will be issued to landowners the week commencing 19th May. The Applicants will be arranging landowner meetings following these updated terms being issued.</p> <p>The Applicants have taken the approach widely seen across the industry for land agreements on linear infrastructure projects and the Applicant is hopeful that voluntary land agreements will be forthcoming through further engagement during the examination phase. It is the Applicants preference to agree the rights sought through a voluntary negotiation and rely on compulsory powers only where absolutely necessary.</p> <p>Going forward the status of negotiations for acquisition of rights by voluntary agreement will be set out within the Land Rights Tracker (document reference S_D1_15_Applicants' Land Rights Tracker) where an update on the progress of negotiations with Landowners, Occupiers and Statutory Undertakers will be provided at the deadlines requested.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_5	3	Applicants	Provide a note on how consultation was undertaken with the Hornbies Foundation Charity in relation to the siting of the Morecambe onshore substation.	<p>The Applicants have had numerous meetings and engagements with the Hornbies Foundation, their agent, Adam Pickervance and the Agricultural Holdings Act tenants, Mr and Mrs J Fare.</p> <p>Initial engagement began with the Hornbies Foundation in July 2022 with the Applicants writing to landowners with an introduction to the Morgan and Morecambe projects and information about surveys requirements and confirming landownership.</p> <p>Following the close of the non-statutory consultation in May 2023 which included the substation zones 1-4, the Hornbies Foundation's agent, Adam Pickervance, was informed during a phone call on 30 August 2023 that the substation zone refinement had taken place and zone 1, which included the Hornbies Foundation's land was preferred.</p> <p>The Applicants requested a meeting to discuss this decision.</p> <p>The Applicants did not receive any feedback from the Hornbies or their appointed agent on the zoning proposals consulted on during the non-statutory consultation.</p> <p>On 4 October 2023, the Applicants requested to meet with Hornbies Foundation.</p> <p>On 6 October the Applicants had a call with the appointed agent, Mr Pickervance, to share plans of the substation locations advising that for Morecambe there were two options being considered, one of which was on the Hornbies Foundations land. On 9th October, the Applicants received an email from Adam Pickervance advising that the Hornbies Foundation objected to the proposals due to the lack of consultation and consideration of financial, environmental and mental health impact of the proposed schemes on the client's holdings, businesses and personal wellbeing. The Applicants met with Hornbies Foundation on 14 November to discuss the substation footprint and design and comments made to date. At this stage, there was no feedback received on the specific siting of the substation and all comments were generalised regarding the Applicants approach to date in relation to consultation. The feedback received from Adam Pickervance on behalf of the Hornbies Foundation during the Statutory Consultation (October to November 2023) detailed concerns on behalf of the Hornbies Foundation around impact on the farm holding comprising future investment in the farm (plans for a new slurry lagoon), ground conditions and focused on the wider site selection and rationale for the overall location rather than the specific location and feedback on alternatives within the holding.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>In accordance with the Consultation Report (APP-170), the Applicants have considered the feedback obtained and relocated the construction access from Preston New Road to allow the construction of the proposed slurry lagoon.</p> <p>A further meeting was held with the Hornbies Foundation on 11 January 2024 where it was confirmed out of the two locations consulted on for the Morecambe substation, the option within the Hornbies Foundation ownership would be taken forward as the preferred option.</p> <p>The Applicants have also sought to take on board feedback from the Hornbies Foundation and Mr & Mrs Fare in the design of the Morecambe substation and access.</p> <p>Through the design stages of the project, the feedback in relation to the routing of the new access from Preston New Road (A584) was raised as a concern due to expansion plans Mr Fare, the tenant of the land, has. The feedback was taken into account, and the access road was redesigned to ensure there were no overlapping development areas between the Morecambe access road and Mr Fares proposals for a new slurry lagoon.</p> <p>Feedback was also received as to the requirement for two accesses for the Morecambe substation, one from the Preston New Road (A584) and another from Lower Lane. The route from the A584 is approximately 760m compared to 130m from Lower Lane. The route from the A584 is the construction access however permanent rights will be retained over this access to facilitate HGV and AIL deliveries, which will be rare, as a result this access will not be fenced as it crosses the fields to the south of the substation. This is to avoid disruption to agricultural activities meaning that the existing use of the fields will not be interfered with. Utilising the access from the A584 as the operational access, permanently fenced off along the entire route, is not proportional for the operational requirements of the Morecambe project and would be overly disruptive to the tenant.</p> <p>The Applicants are continuing to engage with the Hornbies Trust, their appointed agent and the tenant of the holding to discuss the impact on the land and identifying ways to further mitigate the impacts.</p>
CAH1_6	3	Applicants	Provide an annotated plan highlighting the location of the Morecambe operational access from Lower Lane.	The Applicants have provided an annotated plan in Appendix C – Applicants' response to CAH1_6 below.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_7	3	Applicants	Provide greater emphasis on local benefits for the Fylde area in an updated Statement of Reasons.	Please see updated Statement of Reasons (Rev F03) (Document D2) submitted at Deadline 1.
CAH1- Item 4- Corporate structure of the Applicants				
CAH1_8	4	Applicants	Provide confirmation of the current company structure for Morgan OWL and Morecambe OWFL in light of the recent press coverage regarding company changes. Confirm when any necessary updates to the Funding Statement will be made.	<p>The company structure of both Applicants remains as set out in the Funding Statement, (APP-008) as follows:</p> <ul style="list-style-type: none"> • Morgan Offshore Wind Limited, a joint venture of bp Alternative Energy Investments Ltd (bp) and Energie Baden-Württemberg AG (EnBW) (Morgan OWL) • Morecambe Offshore Windfarm Ltd, a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company, part of the VINCI group of companies) (Cobra) and Flotation Energy Ltd (Morecambe OWL) <p>The Applicants are both in the process of changing the parent company ownership. These future changes have been reported in the press.</p> <p>The Applicants have provided diagrams explaining the original company structures of Morgan OWL and Morecambe OWL, and the planned company structures on completion of transactions for Morgan OWL and Morecambe OWL as currently proposed in Appendix D – Applicants' response to CAH1_8 below.</p> <p>Morgan OWL</p> <p>bp and JERA have agreed to combine their offshore wind businesses to form a new standalone equally owned joint venture to be called JERA Nex bp. JERA is a well established global corporate entity with strong background in the energy market. JERA first entered the offshore wind market in 2019 through investments in projects in the UK and Taiwan. In 2023 it acquired Belgium offshore wind player, Parkwind, and later used this business as a platform to spin out a focused renewables vehicle, JERA Nex, created to pursue the renewables target in JERA's 2035 growth strategy. It owns and operates wind farms in Belgium, Germany, Japan and Taiwan and has a development portfolio that includes projects in Japan, Ireland, and Australia.</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>JERA Nex bp will create a global business, with a balanced mix of operating assets and development projects with total 13GW potential net generating capacity. The partners have agreed to provide capital funding for investments (which includes the Morgan OWL) committed to before end of 2030 of up to \$5.8 billion.</p> <p>The completion of this transaction is subject to regulatory and other approvals and Morgan OWL will update the Examination when this process is complete. Until that time Morgan OWL remains in the joint ownership of bp and EnBW as set out above.</p> <p>Morecambe OWL</p> <p>Morecambe OWL is in the process of being acquired by Copenhagen Infrastructure Partners (CIP). CIP is a well-established global corporate entity with strong background in the energy market and its fifth flagship investment fund 'CI V' has a total of 12 billion EUR in commitments. CI V focuses on greenfield investments within large-scale energy infrastructure. It has a global reach, with diversified investments across technologies in low-risk OECD countries. Morecambe OWL will form part of this investment fund.</p> <p>CIP has a 50GW Global Offshore Wind portfolio which ranges from pre-development Projects to fully operational generating assets across four different regions. These Projects are managed through its delivery company Copenhagen Offshore Partners (COP).</p> <p>Morecambe OWL will update the Examination when this transaction is complete and in the meantime Morecambe OWL remains in the joint ownership of Cobra and Flotation Energy as set out above.</p> <p>The Applicants will provide updates to the relevant documentation when these changes have taken place.</p>
CAH1_9	4	Applicants	Provide a note on how the provisions contained within paragraph 17 of the Compulsory Acquisition Guidance will be satisfied in the light of the uncertainty over the identity of the applicants and their financial asset base.	<p>Paragraph 17 of the Planning Act 2008: Guidance relating to procedures for the Compulsory Acquisition of Land (the CA Guidance) states:</p> <p><i>17. Any application for a consent order authorising compulsory acquisition must be accompanied by a statement explaining how it will be funded. This statement should provide as much information as possible about the resource implications of both acquiring the land and implementing the project for which the land is required. It may be that the project is not intended to be independently financially viable, or that the details cannot be finalised until there is certainty about the assembly of the necessary land. In such instances, the applicant should provide an indication of how any potential shortfalls</i></p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p><i>are intended to be met. This should include the degree to which other bodies (public or private sector) have agreed to make financial contributions or to underwrite the scheme, and on what basis such contributions or underwriting is to be made.</i></p> <p>The Applicants have complied with paragraph 17 of the CA Guidance as follows:</p> <ul style="list-style-type: none"> - The Funding Statement APP-008 explains how the development of the Transmission Assets will be funded: • The development cost estimate and property cost estimate set out the resource implications of implementing the Transmission Assets project separately for Morgan OWL and Morecambe OWL <p>There is no anticipated funding shortfall for the Transmission Assets and no contributions or underwriting are anticipated from other bodies</p> <p>Once the parent company changes outlined in response to ISH1_8 above have taken effect, the Funding Statement will be updated with the relevant details and information for JERA Nex bp and CIP to demonstrate compliance with paragraph 17 of the CA Guidance.</p> <p>The Applicants would also highlight that the draft DCO APP-005 secures through Article 33 that prior to the exercise of CA powers provided in the DCO that the Applicants must satisfy the SoS that separately they have sufficient funds available to meet any compensation liabilities from the exercise of those powers.</p> <p>Funding</p> <p><i>33.—(1) Morgan must not exercise the powers conferred by the provisions referred to in paragraph (3) in relation to any land unless it has first put in place either—</i></p> <p><i>(a) a guarantee and the amount of that guarantee approved by the Secretary of State in respect of the liabilities of Morgan to pay compensation pursuant to the provisions referred to in paragraph (3); or</i></p> <p><i>(b) alternative form of security and the amount of that guarantee approved by the Secretary of State in respect of the liabilities of Morgan to pay compensation pursuant to the provisions referred to in paragraph (3).</i></p> <p><i>(2) Morecambe must not exercise the powers conferred by the provisions referred to in paragraph (3) in relation to any land unless it has first put in place either—</i></p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>(a) a guarantee and the amount of that guarantee approved by the Secretary of State in respect of the liabilities of Morecambe to pay compensation pursuant to the provisions referred to in paragraph (3); or</p> <p>(b) alternative form of security and the amount of that guarantee approved by the Secretary of State in respect of the liabilities of Morecambe to pay compensation pursuant to the provisions referred to in paragraph (3).</p> <p>(3) The provisions are—</p> <p>(a) article 20 (compulsory acquisition of land);</p> <p>(b) article 22 (compulsory acquisition of rights);</p> <p>(c) article 24 (private rights);</p> <p>(d) article 26 (acquisition of subsoil only);</p> <p>(e) article 28 (rights under or over streets);</p> <p>(f) article 29 (temporary use of land for carrying out the authorised project); (</p> <p>(g) article 30 (temporary use of land for maintaining the authorised project);</p> <p>(h) article 31 (statutory undertakers); and</p> <p>(i) article 32 (recovery of costs of new connections).</p> <p>(4) A guarantee or alternative form of security given in respect of any liability of either Morgan or Morecambe to pay compensation under this Order is to be treated as enforceable against the guarantor or provider of security by any person to whom such compensation is properly payable and must be in such a form as to be capable of enforcement by such a person.</p> <p>(5) Nothing in this article requires a guarantee or alternative form of security to be in place for more than 15 years after the date on which the relevant power is exercised.</p> <p>(6) Nothing in this article requires a guarantee or alternative form of security to be put in place by Morgan where—</p> <p>(a) Morgan provides the Secretary of State with financial information sufficient to demonstrate that it has appropriate funding in place without a guarantee or alternative form of security to meet any liability to pay compensation under this Order in respect of the exercise of the relevant powers in paragraph (3); and</p>

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p><i>(b) The Secretary of State provides written confirmation that no such guarantee is required, such written confirmation not to be unreasonably withheld.</i></p> <p><i>(7) Nothing in this article requires a guarantee or alternative form of security to be put in place by Morecambe where—</i></p> <p><i>(a) Morecambe provides the Secretary of State with financial information sufficient to demonstrate that it has appropriate funding in place without a guarantee or alternative form of security to meet any liability to pay compensation under this Order in respect of the exercise of the relevant powers in paragraph (3); and</i></p> <p><i>(b) The Secretary of State provides written confirmation that no such guarantee is required, such written confirmation not to be unreasonably withheld.</i></p> <p>The Applicants also noted at the CAH that as part of the Round 4 process consent from The Crown Estate is required as part of the ownership changes outline above. The financial standing of the development companies and their parents was a key element of the eligibility for organisations to be able to bid for and be awarded Round 4 sites.</p> <p>Morgan OWL has engaged positively with TCE throughout the project development phase and has provided TCE with all relevant information describing the financial standing and capabilities of the entities making up Morgan OWL. CIP has engaged positively with TCE during the acquisition and has provided TCE with all relevant information describing the financial standing and capabilities of the proposed transferee (CI V), which allows TCE to determine the suitability of CI V. After obtaining consent from TCE and completion of the relevant transactions the Applicants will provide the relevant information to the Examination and update the CA documentation to demonstrate compliance with paragraph 17 of the CA Guidance.</p>
CAH1_10	4	Applicants	Clarify whether the proposed purchaser of the Morecambe Wind Farm project, Danish Copenhagen Infrastructure V (CI V), will be acquiring the assets or the shares in the company of Morecambe Offshore Windfarm Limited.	Copenhagen Infrastructure Partners fifth flagship fund (CI V) has signed an agreement to acquire the shares in and is currently in the process of acquiring Morecambe Offshore Wind Holdco Limited which is the parent company of Morecambe Offshore Windfarm Limited.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_11	4	Applicants	Provide an update on the progress of the proposed purchaser, CI V, in obtaining approval from the relevant regulatory authorities.	The Agreement for Lease (AfL) between TCE and Morecambe Offshore Wind Farm Limited was awarded subject to assessment by TCE on the financial capability along with other financial, technical, and legal qualifying criteria. The Crown Estate is working closely with CIP on the final arrangements to ensure it is satisfied of CI V's capability to take over the obligations of the AfL. CI V is confident it will reach a position whereby it can assume all funding obligations to The Crown Estate under the wind farm agreement for lease.
CAH1_12	4	Applicants	The applicants submitted that blight claims could only be raised in respect of residential properties. Provide a note on the scope of blight claims. Applicants to confirm the figures in the Funding Statement take into account potential businesses losses and make any necessary updates.	<p>Blight claims allow a qualifying interest to call for their land or property to be acquired early i.e., before the acquiring authority would otherwise acquire it for the development. Relevant qualifying interests for blight claims are:</p> <ul style="list-style-type: none"> • a resident owner-occupier of a private dwelling • an owner-occupier of any business property where the annual (rateable) value does not exceed the prescribed limit at the date of service of blight notice (£36,000 in England excluding Greater London and £44,200 in Greater London based on 2017 rateable value) • an owner-occupier of an agricultural unit • certain mortgages and personal representatives <p>For a blight notice to be accepted and compensation to be payable, it must be supported by evidence that the claimant has made reasonable endeavours to sell the land or property in question and that the claimant has been unable to do so or could only do so at a reduced price substantially lower than that which it might reasonably have been expected to sell if not for the development.</p> <p>Throughout the course of consultations and negotiations with landowners and occupiers along the route, the Applicants have not been made aware of:</p> <ul style="list-style-type: none"> • any attempts to sell any of the land subject to compulsory acquisition that has resulted in the land or property only being able to be disposed of at a significantly lower value, or • any qualifying interests intending to serve a blight notice.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
				<p>The only instances where the Applicants are seeking to compulsorily acquire the freehold title is over land required for the substation and the related landscaping and environmental mitigation works:</p> <ul style="list-style-type: none"> for Morgan this is plots 11-123A, 11-124A, 12-019A, 12-027A, 12-005A, 11-125A, 11-126A, 12-029A, 12-011A, 12-006A, 14-012A, 14-013A, 14-014, 14-015, 14-016A, 14-017, 14-018, 14-019A, 14-020, 14-021, 14-025A, 14-026A, 14-027A, 16-033, 16-038A, 16-039, 16-040A, 16-041, 16-056A, 16-057, 16-058A, 16-059, 16-060A, 16-065A, 16-066, 16-067A, 16-069A, and for Morecambe plots 9-002B, 11-109B, 13-008B, 13-009B, 14-028B, 14-029B, 14-030, 14-031B, 14-032, 14-033B, 14-034B, 14-035, 16-061B, 16-062, 16-063B) as set out in the Statement of Reasons and Book of Reference. <p>The Applicants are not aware that any land for which compulsory acquisition is sought would comprise a qualifying interest for the purposes of a blight claim. On the basis of the above, the Applicants consider it unlikely blight claims would be received and a contingency of £100,000 is included within the property cost estimate. The Property Cost Estimates (APP-009 and APP-010) does include compensation for claims under Part 1 of the Land Compensation Act 1973. This is an amount of compensation for depreciation due to the use of infrastructure installed for the project where no land is taken. This mechanism can be used to claim compensation for the depreciation in the value of land or property caused by physical factors arising from the use of public works, such as noise, vibration, smell, fumes, smoke, artificial lighting, and the discharge of any solid or liquid substance. Therefore, if the operation of the assets once installed cause a depreciation in land value, a Part 1 claim would be made.</p> <p>Compensation arising from the temporary construction works including loss of livestock production, crops, business losses / extinguishment, losses associated with above ground structures, reinstatement costs and claimant's justified time has been included within the Property Cost Estimates submitted (APP-009 and APP-010). The Applicants therefore do not consider there is a need to update the property cost estimate submitted with the Application at this time.</p>
CAH1 - Item 5 - Examining Authority's questions				

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_13	5	Applicants	Provide an update to the Consents and Licences document (APP-232) so this accords with the CA Guidance referred to in paragraph 1.1.1.6. This should refer to a number of other consents such as the planning application for the Penwortham extension, the Morgan and Morecambe Generation DCOs and the Crown Estate leases.	The Applicants submitted the updated Consents and Licences Required Under Other Legislation (J27/F02) at Deadline 1.
CAH1_14	5	Applicants	Clarify in the Project Description chapter (AS-024) the extent of the authorised development within the Penwortham substation.	<p>The Applicants can confirm that the works listed in Section 3.16 of Volume 1, Chapter 3: Project Description (AS-024) and the Works descriptions for Works No.37A and 37B as set out in Schedule 1 (Authorised Project) of the draft DCO (AS-004) are works which the Applicants would need to carry out in order to facilitate the connection of the 400kV Grid Connection Cables into the allocated connection bay at National Grid Penwortham substation.</p> <p>Any works which are required in relation to the creation and/or upgrade to connection bays for third-party customers (including Morgan OWL and Morecambe OWL) to the electricity transmission network would be identified, relevant permits and permissions obtained, and works undertaken by National Grid. National Grid did note in their Relevant Representation (RR-1598) that: <i>NGET are seeking planning permission for the initial Penwortham Substation extension, this application is proposed to be submitted Q4 2025.</i> However, the Applicants can confirm that this is different to the works outlined in Section 3.16 of Volume 1: Chapter 3: Project Description (AS-024).</p>
CAH1_15	5	Applicants	There will clearly have been considerable contact between the applicants and National Grid. Provide an update to give some clarity as to how the connections will be made in practical terms.	Both Morgan OWL and Morecambe OWL will independently install their respective 400kV grid connection cables to within the fence boundary of the Penwortham Substation. The 400kV cables will be terminated at Cable Sealing Ends (CSE) and the fibres at an agreed termination point located at positions agreed upon with National Grid Electricity Transmission (NGET). All works beyond the termination points, including the installation of associated substation infrastructure and connection bays, will be the responsibility of NGET.

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_16	5	Applicants	Provide an update on the applicants' agreements for lease with The Crown Estate. An explanation to be provided as to the extent of land these agreements cover and whether a further agreement for lease be required for the land contained within the application.	<p>The Applicants are currently in discussions with The Crown Estate (TCE) to finalise the Transmission Agreement for Lease(s) (TAfL). The Applicants expect to have executed their respective TAfLs prior to the close of the examination. The Applicants are progressing separate TAfLs with TCE for each Project and the TAfLs will only relate to the seabed transmission assets for each project. The designated areas defined in the TAfLs pertain to the following locations as identified in APP-151 of the Applicants' submission:</p> <ul style="list-style-type: none"> • 1A • 1B • 2A2B • 3A3B <p>The TAfL designated area ends within Work Number 2A2B at the agreed boundary point of Lowest Astronomical Tide (LAT) at the foreshore of St Annes Beach. Through discussions with TCE and as part of project development activities, the Applicants have engaged with all known and identified statutory undertakers, utility operators and private asset owners within the Order Limits. The Applicants have identified TCE have an interest in plots 16-001, 16-104B, 16-105A, 19-001 and 19-002 and have issued correspondence to TCE to seek consent under Section 135 of the Planning Act 2008.</p> <p>The Applicants have already entered into separate AfLs with TCE for the development of their respective Generation Assets (the "Windfarm Agreement for Lease" or "WAfL").</p>
CAH1_17	5	Applicants	Review the Statement of Reasons (AS-008) to add reference to cofferdams together with the works to the recreation ground and consider whether further detail is required in relation to the open space test of s132 of the Planning Act 2008.	Please see updated Statement of Reasons (Rev F03) (Document D2) submitted at Deadline 1.
CAH1 - Item 6 - Human Rights and Equality Act				

Hearing Action Point (HAP)	Agenda item	For whom	ExA Question	Applicants' response
CAH1_18	6	Applicants	It is noted that further to procedural decision 10 (requests for further information from the applicants) in the ExA's Rule 6 letter, the applicants confirmed at the preliminary meeting that an equalities impact assessment would be submitted by deadline 1.	Please see the Applicant's Public Sector Equality Duty Statement (Document Reference S_D1_8) submitted at Deadline 1.

2 Appendices

2.1 Appendix A – Applicants' Response to ISH1_7

- 2.1.1.1 The Applicants have provided Figure 1, illustrating an example of how consultation has been taken into account in the BRAG (Black, Red, Amber, Green) process to refine the onshore cable corridor.

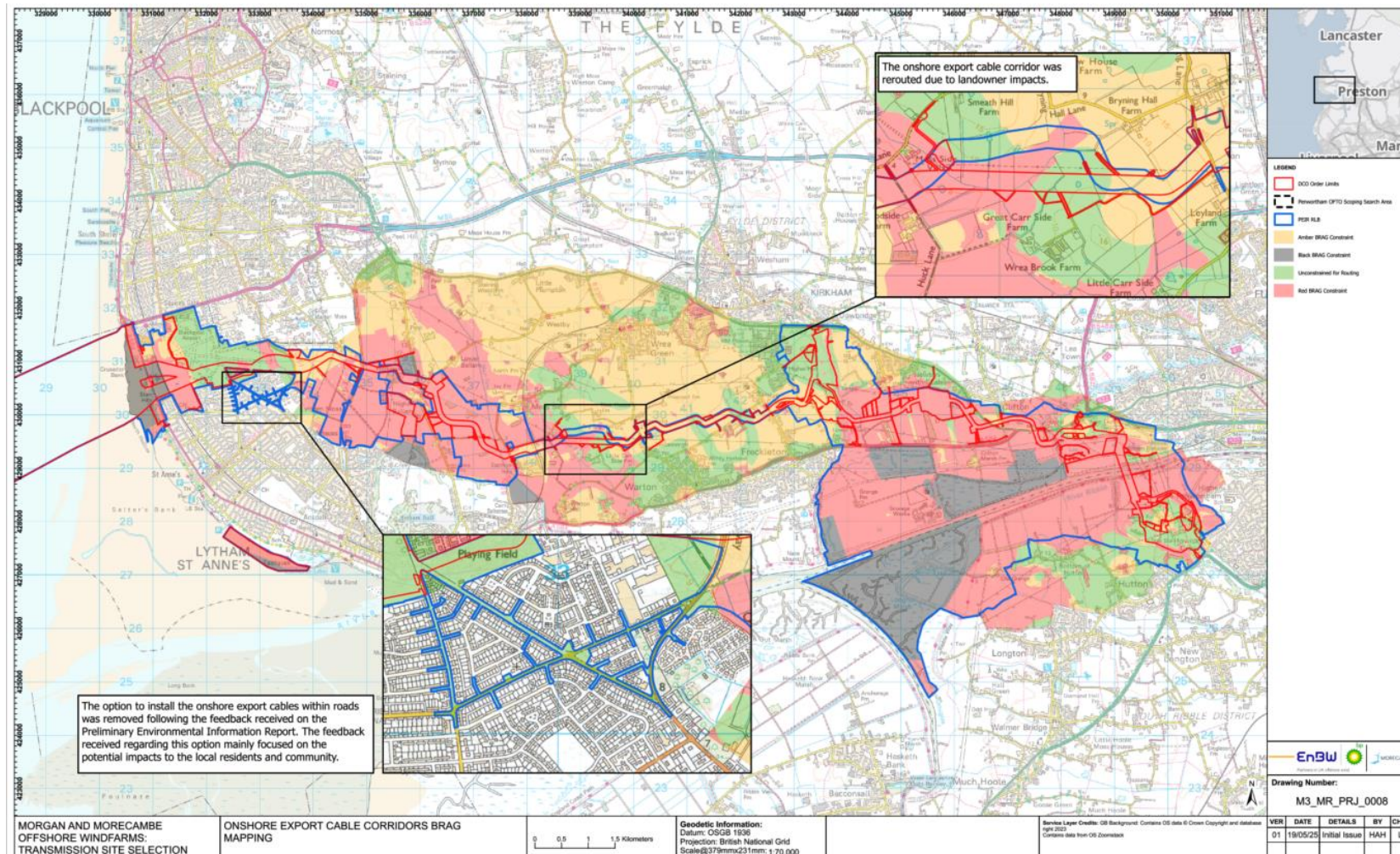


Figure 1: Illustrating examples of how consultation has been taken into account in the BRAG (Black, Red, Amber, Green) process to refine the onshore cable corridor

2.2 Appendix B – Applicants’ Response to ISH1_24

- 2.2.1.1 For clarity the Applicants have provided two plates illustrating the sequential construction scenario programme with up to the four-year gap. Plate 2.2 assumes Morgan OWL is constructed first followed by Morecambe OWL, and **Error! Reference source not found.** assumes Morecambe OWL is constructed first followed by Morgan OWL.

Plate 2.1: Indicative construction programme for a sequential construction scenario including the four-year gap with Morgan Offshore Wind Project: Transmission Assets constructing first followed by Morecambe Offshore Windfarm: Transmission Assets

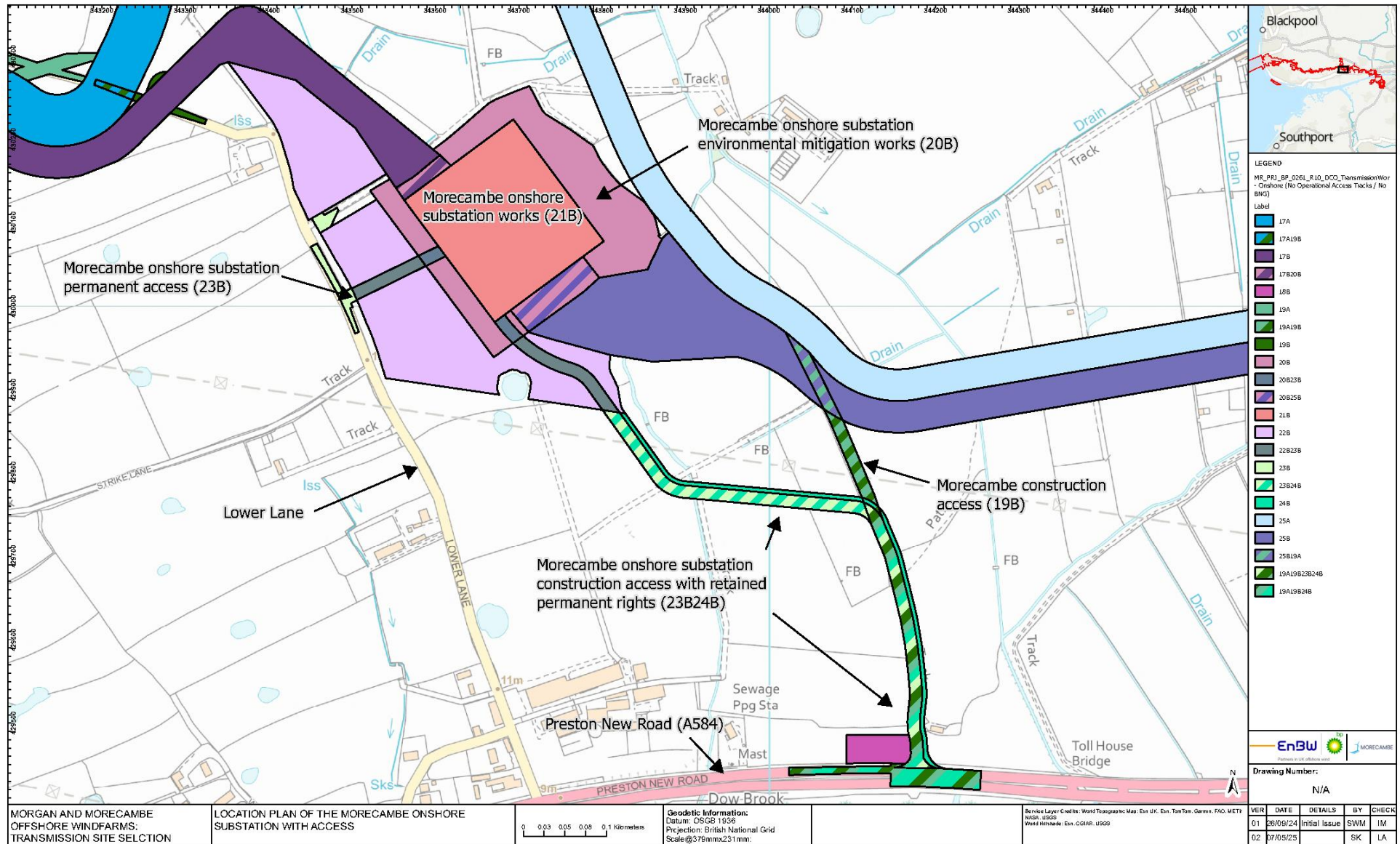
	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Q18	Q19	Q20	Q21	Q22	Q23	Q24	Q25	Q26	Q27	Q28	Q29	Q30	Q31	Q32	Q33	Q34	Q35	Q36	Q37												
Onshore Substation - Enabling Works															Up to four-year gap between Morgan OWL and Morecambe OWL																																		
Onshore Substation - Construction																																																	
Onshore Cable Ducting and Installation																																																	
Landfall Direct Pipe/ Cable Pull																																																	
Seabed Preparation Activities																																																	
Offshore Export Cables Installation																																																	

Plate 2.2: Indicative construction programme for a sequential construction scenario including the four-year gap with Morecambe Offshore Windfarm: Transmission Assets constructing first followed by Morgan Offshore Wind Project: Transmission Assets

	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10	Q11	Q12	Q13	Q14	Q15	Q16	Q17	Q18	Q19	Q20	Q21	Q22	Q23	Q24	Q25	Q26	Q27	Q28	Q29	Q30	Q31	Q32	Q33	Q34	Q35	Q36	Q37											
Onshore Substation - Enabling Works												Up to four-year gap between Morecambe OWL and Morgan OWL																																				
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Seabed Preparation Activities																																																
Offshore Export Cables Installation																																																

2.3 Appendix C – Applicants Response to CAH_6

2.3.1.1 The Applicants have provided the annotated plan highlighting the location of the Morecambe operational access from Lower Lane



2.4 Appendix D – Applicants Response to CAH_8

2.4.1.1 Plate 2.3 shows the original company structures of Morgan OWL and Morecambe OWL, and Plate 2.4 shows the planned company structures on completion of transactions for Morgan OWL and Morecambe OWL as currently proposed which are obviously subject to due diligence and relevant legislative jurisdiction and approval before being confirmed.

Plate 2.3: Original Company Structures of Morgan OWL and Morecambe OWL

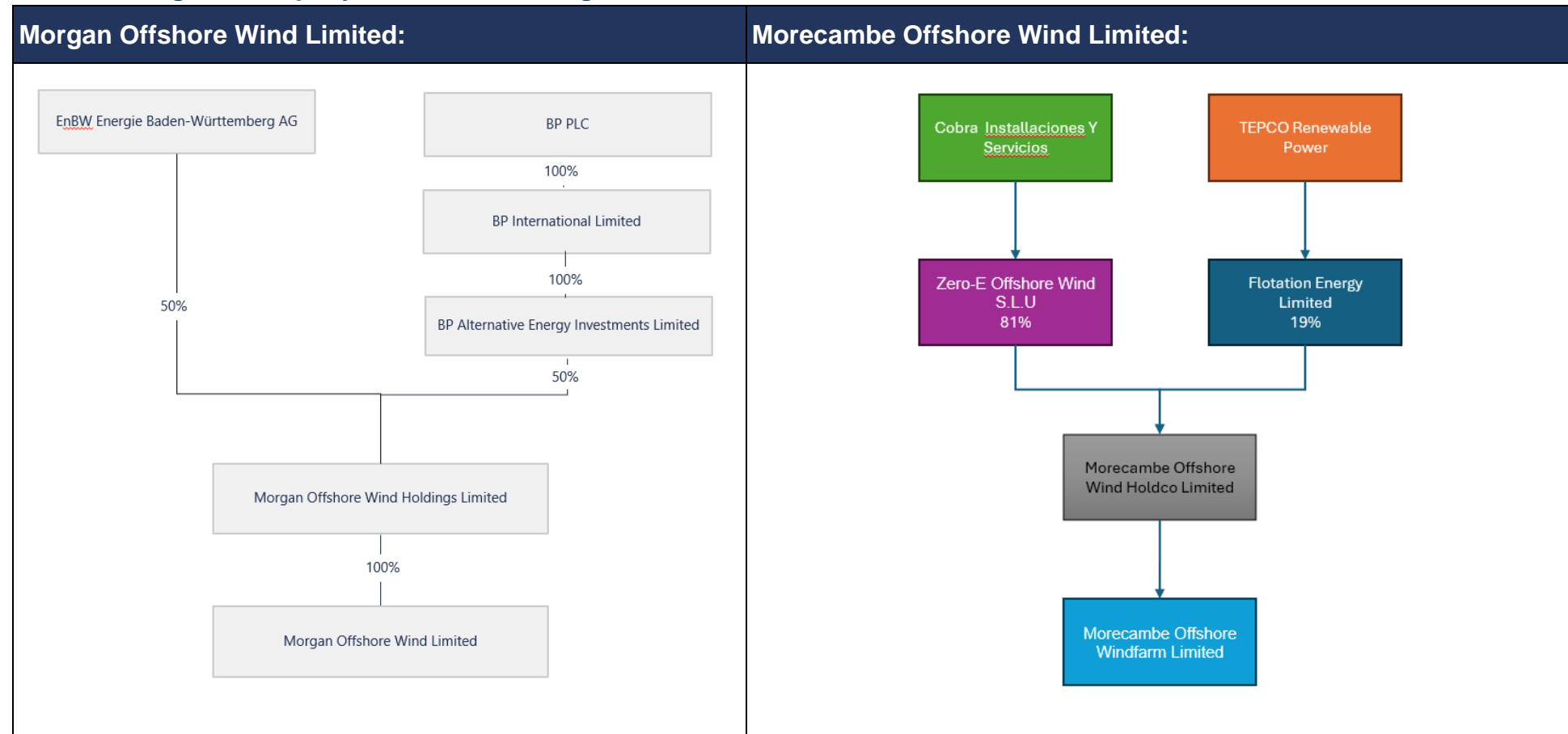


Plate 2.4: Planned Company Structures on completion of transactions for Morgan OWL and Morecambe OWL

