

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' response to Hearing Action Point ISH1 2: Planning Statement Addendum



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1 Introduction

1.1 Planning Statement Addendum

1.1.1.1 This Planning Statement Addendum has been prepared by RPS on behalf of the Applicants, in response to a request from the Examination Authority at Issue Specific Hearing 1 requesting:

‘An update or an addendum to the submitted Planning Statement [APP-233] commenting on recent changes to planning policy including the consultation on the National Policy Statements (including comments on the transitional arrangements) and updates to the National Planning Policy Framework (NPPF).’

1.1.1.2 It is not the intention of the Planning Statement Addendum to provide updates following the submission and publication of the Local Impact Reports (LIRs) on how the Transmission Assets comply with local planning policy; this is reserved for the Policy Trackers (APP-231, APP-234, APP-236) which will be updated and submitted for Deadline 6, as reflected by Hearing Action Point ISH1_5).

1.1.1.3 Brief commentary has also been provided upon:

- marine policies;
- local planning policies; and
- the forthcoming Planning and Infrastructure Bill.

2 National Policy Statements

2.1 Draft National Policy Statements EN-1, EN-3 and EN-5.

- 2.1.1.1 Section 3.4.4 of the Planning Statement (REP1-032) provides detail on the relevant National Policy Statements (NPS) for the Transmission Assets. This details that the relevant NPSs (Overarching NPS for Energy (NPS EN-1); NPS for Renewable Energy Infrastructure (NPS EN-3); and NPS for Electricity Networks Infrastructure (NPS EN-5)) are the primary policy documents for decision-making and the assessment presented in the Planning Statement is made on that basis. The Applicants provided an update to the Planning Statement (REP1-032) to confirm their position that this is the case, on the basis that the Application should be determined under section 104 of the Planning Act 2008.
- 2.1.1.2 On 24 April 2025, the Department for Energy Security and Net Zero (DESNZ) published a consultation on revisions to the aforementioned NPSs, in order to strengthen the Government's commitment to deliver more renewable energy infrastructure across England and Wales. The consultation opened on 24 April 2025, and is due to close on 29 May 2025.
- 2.1.1.3 The draft NPS are subject to Transitional Arrangements, which state:
'While the review is undertaken, the current suite of energy NPS remain relevant government policy and EN-1 to EN-5 have effect for the purposes of the Planning Act 2008. The Secretary of State has decided that for any application accepted for examination before amending the energy NPSs, the current suite of energy NPS, published in 2024, should have effect. ... However, any emerging draft energy NPSs (or those amended but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each development consent order application.'
- 2.1.1.4 It is therefore clear that the NPSs which came into force in January 2024, remain the relevant government policy in regard to the determination of the Transmission Assets. However, it is noted that the draft NPSs may be a material consideration and are therefore an important suite of documents for the ExA to be aware of.
- 2.1.1.5 Considering the close of the Consultation on the draft NPSs is ahead of Deadline 2, further commentary can be provided where necessary in the National Policy Statement Tracker as to the impact any potential updates to the NPSs may have in regard to the Transmission Assets, for Deadline 6.
- 2.1.1.6 Broadly, and in specific relation to Transmission Assets, draft EN-1 has introduced the Clean Power 2030 Action Plan (published in December 2024) into policy. The Clean Power 2030 Action Plan proposes for at least 95% of the UK's energy generation by 2030 to come from clean energy sources. The Clean Power 2030 Action Plan establishes 'Clean

Power Capacity Ranges’, which DESNZ has set at 43-50 GW for offshore wind, against a backdrop of 30.7 GW either installed, committed or under construction.

- 2.1.1.7 In addition, draft EN-1 also considers a range of paths in order to meet the ambitions of the Clean Power 2030 Action Plan, which includes the mass deployment of offshore wind, and its associated transmission infrastructure, at an accelerated pace.
- 2.1.1.8 In regard to draft EN-3, whilst a number of amendments have been introduced regarding offshore wind arrays and wake effects, these are not relevant to the Transmission Assets. Draft EN-3 also provides guidance regarding onshore wind proposals, however these are not of relevance to Transmission Assets.
- 2.1.1.9 Draft EN-5 introduces the Electricity Transmission Design Principles (ETDP) which will be developed by NESO and will be applicable to onshore and offshore electricity transmission infrastructure, with the purpose of providing greater clarity on the type of asset to be used within different environments, how the impact of transmission infrastructure can be mitigated, and will set out the level of flexibility of route and technology design. Once published, Applicants will be required to have regard to the ETDP, alongside the National Grid’s Holford and Horlock Rules.
- 2.1.1.10 Draft EN-5 also endorses the Centralised Strategic Network Plan (CSNP). The CSNP, delivered by NESO and which builds on the Pathway to 2030 Holistic Network Design for offshore wind and Beyond 2030 reports, will provide an independent, long-term approach to 2050 on how the transmission network should develop, to meet energy security and decarbonisation goals. It is intended to help reduce the overall impact of infrastructure by taking a coordinated view of the onshore and offshore network, with the first CSNP due to be delivered in 2027. The Transmission Assets did form part of the Holistic Network Design Review, a key output of which was the recommendation that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively.
- 2.1.1.11 Overall, the amendments to the draft NPSs provide greater policy support for the Transmission Assets, in light of the Clean Power 2030 Action Plan and the ambitious policy of achieving the majority of the UK’s energy generation to come from clean energy sources by 2030. Whilst the amendments in draft EN-5 are welcomed, these would not be applicable to the Transmission Assets, due to the timing of the publication of the ETDP and the CSNP, which is currently unknown.
- 2.1.1.12 The National Policy Statement Tracker (APP-231) will be updated for Deadline 6, with the Local Impact Reports taken into account, as required.

3 National Planning Policy Framework

3.1 NPPF December 2024

- 3.1.1.1 Following the submission of the Transmission Assets Application, the NPPF was subject to further revisions in December 2024, which became effective immediately.
- 3.1.1.2 The Planning Statement (REP1-032) discusses the NPPF (NPPF, 2023) at section 3.4.6 alongside a separate NPPF Tracker (APP-234).
- 3.1.1.3 The Applicants acknowledged in the Issue Specific Hearings that there has been an update to the National Planning Policy Framework (NPPF), however the Applicants submitted that the NPPF changes are not material, especially given the NPS is the primary policy for the SoS to determine the application (see paragraph (4) of REP1-034).
- 3.1.1.4 The main updates to the NPPF, in relation to the Transmission Assets, pertain to Section 13, Protecting Green Belt land; specifically the introduction of the Golden Rules in regard to development located within the Green Belt, and the introduction of the Grey Belt. Due to the revisions, a number of paragraph numbers have also been amended. In light of the amendments to the NPPF, specifically in relation to the Green Belt, the PPG was also updated in February 2025 to reflect these changes. These updates will be reflected in the NPPF Tracker (APP-234) for Deadline 6.
- 3.1.1.5 In addition, the NPPF introduced Paragraph 163, which confirms that *‘the need to mitigate and adapt to climate change should be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts’*. The 2024 NPPF was also updated to incorporate support within the planning system to the transition to net zero (former paragraph 155 (NPPF, 2023), now paragraph 161 (NPPF, 2024). Paragraph 168 (NPPF, 2024) now requires that in the determination of renewable and low carbon energy developments, *‘significant weight to the benefits associated with renewable and low carbon energy generation, and the proposals contribution to a net zero future’* (former paragraph 161, NPPF, 2023). The NPPF has provided further, reinforcing support for development that supports the transition to net zero and the drive to mitigate and adapt to the effect of climate change.
- 3.1.1.6 Other updates include:
- Sustainable Transport – Former Paragraph 108 (NPPF, 2023), now Paragraph 109 (NPPF, 2024) seeks for transport considerations to form part of early engagement with local communities. In regard to Transmission Assets, whilst not a requirement at the time, details regarding potential highways impacts were produced as part of non-statutory and statutory consultation. The Consultation Report (APP-170) provides further details.
 - Climate Change and Community Health – Former paragraph 153 (NPPF, 2023), now paragraph 162 (NPPF, 2024) has included the requirement for policies to support appropriate measures to ensure

the future health of communities, in relation to infrastructure to climate change impacts. In relation to the Transmission Assets, the impact on Human Health has been considered at Volume 1, Annex 5.1: Human health (APP-035).

- Flood Risk – Former paragraph 175 (NPPF, 2023), now paragraph 182 (NPPF, 2024) has introduced additional wording regarding improvements to water quality and biodiversity, and seeks for all development which could affect drainage on or around a site, to incorporate proportionate sustainable drainage systems, relative to the nature and scale of the proposal. The draft Development Consent Order (DCO) for the Transmission Assets has already been submitted with an Outline Operational Drainage Management Plan (APP-215) and the NPPF amends do not alter this position.

3.1.1.7 Overall, in relation to the Transmission Assets, the NPPF is still a material consideration, and it provides overall and ongoing support for developments such as the Transmission Assets. The NPPF Policy Tracker will be updated for Deadline 6, with the Local Impact Reports taken into account where necessary.

4 Marine Policies

4.1 UK Marine Policy Statement and North West Inshore and North West Offshore Marine Plans 2021

- 4.1.1.1 The Planning Statement (REP1-032) provides detail on Marine Policy at Section 3.4.5 and the Marine Policy Statement and North West Inshore and Offshore Policy Tracker (APP-235) provides a policy compliance table for the UK Marine Policy Statement and North West Inshore and North West Offshore Marine Plans.
- 4.1.1.2 There are no known updates to these documents, and therefore they have not been considered further in this addendum. This has been confirmed by the Marine Management Organisation in their Relevant Representation submitted for Deadline 1 (REP1-086).
- 4.1.1.3 Any updates to the marine policies will be captured in the Marine Policy Statement and North West Inshore and Offshore Policy Tracker , to be updated and submitted for Deadline 6 where necessary.

5 Local Planning Policies

- 5.1.1.1 The relevant Local Planning Policies have been considered in full in section 3.4.7 of the Planning Statement (APP-233) and the Local Planning Policy Tracker (APP-236), which details the relevant policies from the following documents:
- Blackpool Local Plan Part 1: Core Strategy
 - Blackpool Local Plan Part 2
 - Fylde Local Plan to 2032 (incorporating Partial Review)
 - Saint Anne's on the Sea Neighbourhood Development Plan
 - Bryning with Warton Neighbourhood Development Plan
 - Preston Local Plan
 - South Ribble Local Plan
 - Penwortham Town Neighbourhood Development Plan
 - Central Lancashire Core Strategy
 - Joint Lancashire Minerals and Waste Core Strategy
 - Lancashire County Council Local Flood Risk Management Strategy
 - Joint Lancashire Minerals and Waste Local Plan: Site Allocation and Development Management Policies.
- 5.1.1.2 Paragraph 1.3.10 of NPS EN-1 and the Rule 6 letter for Transmission Assets confirms that local planning policies are important and relevant, however do not displace the primacy of the NPSs. This remains the case in the draft EN-1.
- 5.1.1.3 It is noted that Local Impact Reports have been submitted by Blackpool Borough Council (REP1-068), Fylde Borough Council (REP1-078) and Lancashire County Council (REP1-085), which raise a number of non-compliance queries in regard to local planning policies and Transmission Assets. It is not the purpose of this Planning Statement Addendum to discuss how the Transmission Assets comply with local planning policy; this shall be addressed in updates to the Local Plan Policy Tracker , where necessary, which will be provided for Deadline 6.
- 5.1.1.4 The Applicants are not aware of any amendments to the Local Planning Policy documents listed above in **paragraph 5.1.1.1**, however are aware of a number of emerging Local Plans which have been briefly considered below:
- 5.1.1.5 In regard to emerging Local Plans;
- Central Lancashire Plan – A Local Plan for the local authorities of Preston, South Ribble and Chorley is being jointly prepared, and will cover the period to 2041. It is intended to include both strategic policy for the whole area, and detailed non-strategic policy for each local authority area. At the time of writing (May 2025), a Regulation 19 version had recently concluded on 14 April 2025, with consultation

responses being considered. The most recent Local Development Scheme (April 2024) anticipates submission of the plan by 30 June 2025, and for adoption of the Central Lancashire Plan between July-December 2026. Whilst Paragraph 49 of the NPPF 2024 allows weight to be given to relevant policies in emerging plans according to a) their stage of preparation, b) the extent to which there are unresolved objections and c) the degree of consistency of the relevant policies to the relevant policies in the NPPF, the Central Lancashire Plan is still at an early stage of preparation, has not yet been subject to examination and is subject to change. Therefore, it is suggested that very little weight can currently be afforded to the Central Lancashire Plan, but it is recognised that this weight may increase, as Transmission Assets moves through Examination; this position can be revisited at future deadlines, if required.

- Blackpool Borough Council New Local Plan to 2045 – Whilst limited information is available at the time of writing (May 2025), a new local plan for Blackpool is being developed, that will cover the period up until 2045 and will replace the Blackpool Local Plan Part 2 and Part 2 documents. The latest Local Development Scheme (February 2025) suggests adoption is likely to be between September 2030 and February 2031. As detailed in the Blackpool Borough Council Local Impact Report (REP1-068), due to its early stage, it is not anticipated that the new Local Plan will be a material consideration in regard to the Examination of Transmission Assets.
- Fylde Local Plan to 2042 – In the most recent Local Development Scheme (January 2025) and as confirmed in their Local Impact Report (REP1-078), Fylde Borough Council have set out a timetable for the production and adoption of a new Local Plan, which currently anticipates adoption for October 2027. The new Local Plan is in very early stages of preparation, with a Regulation 18 consultation due to take place in August or September 2025. Due to the early stages of the new Local Plan, this will not be a material consideration in the Examination of Transmission Assets.

5.1.1.6 Therefore, there are currently no known changes to Local Planning Policy that may materially impact the Examination of Transmission Assets. Section 3.4.7 of the Planning Statement includes a number of tables which tabulates Local Planning Policies; these will be updated for deadline 6.

6 Planning and Infrastructure Bill 2025

- 6.1.1.1 On 11 March 2025, The Planning and Infrastructure Bill 2025 was introduced to Parliament seeking to, *inter alia*, bolster energy security with cheaper, clean homegrown power and with an aim for key infrastructure to be built faster with a target of 150 major infrastructure projects to be determined by the end of the current Parliament.
- 6.1.1.2 In specific regard to Infrastructure, NSIPs and Electricity, the Planning and Infrastructure Bill seeks to:
- Amend the Planning Act 2008 to require National Policy Statements to be reviewed in full every five years.
 - Streamline the procedure for making specific amendments to the NPSs identified during the above review process.
 - Provide the Secretary of State with the power to direct specific projects out of the DCO regime and to be consented via another route on a case-by-case basis.
 - Amend consultation requirements for DCOs including amendments to consultation reports and those who are required to be consulted as part of the pre-application process.
 - Strengthen requirements for the acceptance of a DCO applications and allowing Examining Authorities to make costs awards at any stage of the DCO process.
 - Amend the judicial review process.
 - Include provisions to grant the relevant Secretary of State and the Gas and Electricity Markets Authority with the power to amend or modify electricity licences and connection agreements.
 - Impose a duty upon grid and electricity distributors to '*have regard to the designated strategic plans*,' which the relevant Secretary of State can designate through secondary legislation; and
 - Propose consumer benefits for those who live in proximity to electricity transmission projects.
- 6.1.1.3 Subsequent updates to the Bill have included the removal of the statutory requirement to consult, as part of the pre-application stage for NSIP applications.
- 6.1.1.4 At the time of writing (May 2025), the Bill has been heard twice in the House of Commons, and has passed through the Committee Stage, with a report awaited. The Bill is required to pass through a number of other stages prior to achieving Royal Assent.
- 6.1.1.5 Due to the timing of the Bill and the stage of Transmission Assets, the Bill is not considered to materially impact upon the Application or be a material consideration for Examination. Should the Bill progress further during the Examination of Transmission Assets, this position will be reassessed with further commentary provided at future deadlines.

7 Summary

- 7.1.1.1 The main changes in regard to planning policy since the submission of the Transmission Assets have been the updates to the NPPF in December 2024 and subsequent updates to the PPG, and the consultation on draft NPSs EN-1, EN-3 and EN-5.
- 7.1.1.2 The most significant policy change within the NPPF 2024 and in relation to Transmission Assets, relates to the Green Belt and the introduction of the Golden Rules, and the introduction of the Grey Belt.
- 7.1.1.3 In regard to the draft NPSs subject to consultation, NPS EN-1 provides greater policy support for the Transmission Assets, in light of the Clean Power 2030 Action Plan. The proposed amends to NPS EN-3 are of less relevance to the Transmission Assets and whilst the changes proposed to NPS EN-5 are welcomed, these too are not considered to be of relevance to the Examination of Transmission Assets.
- 7.1.1.4 There have been no updates in regard to Marine Planning Policies nor Local Planning Policies. Whilst it is noted that a number of emerging Local Plans are coming forward, these are in the early stages of production and therefore unlikely to be material to the Transmission Assets. It is also considered that the Planning and Infrastructure Bill 2025 which is likely to progress through Examination, will not be a material consideration for the decision making in relation to the Transmission Assets.