



RESPONSE TO THE FIRST WRITTEN QUESTIONS OF THE EXAMINING  
AUTHORITY ON BEHALF OF

(1) BARROW OFFSHORE WIND LIMITED (IP: 20054059), (2) BURBO  
EXTENSION LTD (IP: 20054057) (3) WALNEY EXTENSION LIMITED (IP:  
20054065), (4) MORECAMBE WIND LIMITED (IP: 20054067), (5) WALNEY  
(UK) OFFSHORE WINDFARMS LIMITED (IP: 20054062), (6) ØRSTED  
BURBO (UK) LIMITED (IP: 20054053) (THE "ØRSTED IPs")

IN CONNECTION WITH THE application by Morgan Offshore Wind Limited  
and Morecambe Offshore Windfarm Limited for an Order Granting  
Development Consent for the Morgan and Morecambe Offshore Wind Farms  
Transmission Assets

## 1. Introduction

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- 1.1 This submission is provided in accordance with Deadline 3 of the examination timetable for the application Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “**Applicants**”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“**Project**”).
- 1.2 We represent six owners of operational offshore windfarms in the East Irish Sea (as set out relevant representations RR-0218, RR-0276, RR-1558, RR2303, RR-2266, RR-2267), who we refer to together as the “**Ørsted IPs**”. This submission contains the Ørsted IPs’ response to the examining authority’s first set of written questions (“**ExQ1**”) [PD-008] (provided overleaf).

Shepherd & Wedderburn LLP

07.07.2025

Question number	Question	Response
Q9.5.5	<p><b>Offshore Ornithology</b></p> <p>The ExA notes that the Orsted interested parties (IPs) have raised general concerns over the applicants' assessment of effects and the absence of a compensation and derogations case for the Liverpool Bay SPA, however no specific concerns have been raised. Can the Orsted IPs detail any specific concerns over the HRA screening and ISAA conclusions</p>	<p>The Ørsted IPs' concerns relate to the uncertainty of mitigation-compensation measures which could be implemented in respect of Liverpool Bay SPA. While the Applicants have maintained that such measures will not be required, Ørsted IPs understand that Natural England does not agree with their position. As such, it is uncertain whether a derogation case will be required, and what the outcomes of such a process would be.</p> <p>It is possible that any compensation measures which could be required through the derogation process could materially impact on the Ørsted IPs' assets. As such, the Ørsted IPs are required to maintain an interest in this matter until such time as any potential mitigation and compensation measures are identified.</p> <p>The Ørsted IPs acknowledge that it appears that Natural England and the Applicants have been engaging in respect of seasonal restrictions to construction activities, which may resolve Natural England's concerns [REP2-034]. The Ørsted IPs do not have any concerns regarding that course of action.</p>