

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Deadline 4 Cover Letter

Deadline: Deadline 4
Application Reference: EN020028

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Prepared for:

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

8 August 2025

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

Dear Sir / Madam,

Planning Act 2008

The proposed Morgan and Morecambe Offshore Wind Farms: Transmission Assets

Planning Inspectorate Reference Number: EN020028

Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL) (together, the Applicants) enclose their submission for Deadline 4.

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

Application Guide

The Applicants have updated the Application Guide (A4 F08) and have provided a clean and tracked version. The updated Application Guide contains a complete list of documents comprising the Applicants' Deadline 4 submission.

Interested Party submissions at Deadline 3

The Applicants reviewed the IP submissions received at Deadline 3 and have provided a response to the following in document S_D4_2: 'Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisations' and its supporting annexes:

- Annex 2.1 BAE Systems (REP3-073, REP3-074)
- Annex 2.2 Environment Agency (REP3-079, REP3-080, REP3-081)
- Annex 2.3 Fylde Borough Council (REP3-082)
- Annex 2.4 Lancashire County Council (REP3-084)
- Annex 2.5 Marine Management Organisation (REP3-085)
- Annex 2.6 Natural England (REP3-90 - REP3-95)

And additional documents:

- S_D4_3 Applicants' Response to Deadline 3 submissions from People with an Interest in Land
- S_D4_4 Applicants' response to Public Deadline 3 submissions

Hearing Summaries

The Applicants have submitted their hearing summaries for the recent ISH 2, ISH 3, and CAH 2:

- Hearing Summary for ISH2 (Applicants' Hearing Summary ISH2 Day 1, S_D4_25, ISH2 Day 2 (Applicants' Hearing Summary ISH1 Day 2, S_D4_6)
- Hearing Summary for ISH3 (Applicants' Hearing Summary ISH3, S_D4_7)
- and CAH2 (Applicants' Hearing Summary CAH2, S_D4_8).

Examining Authority's Hearing Action Points

The Applicants have responded to the Hearing Action points raised at ISH2, ISH3, and CAH2. These can be found in the document 'Applicants response to Hearing Action Points of ISH2, ISH3 and CA2 due at Deadline 4' (S_D4_9) and its appendices as listed below:

- Annex 9.1 Clarification note on the current position with Natural England (regarding Adverse Effect on Integrity) and the Fairhaven saltmarsh mitigation area (S_D4_9.1)
- Annex 9.2 Timetable for Engagement (S_D4_9.2)
- Annex 9.3 Agricultural Holdings Indicative Mitigation Plan (S_D4_9.3)
- Annex 9.4 Tetra Tech Conflict of Interest Note (S_D4_9.4)
- Annex 9.5 Hearing Action Points ISH2 43 and 44 (S_D4_9.5)
- Annex 9.6 Summary of trial trenching approaches in other DCO applications (S_D4_9.6)

Updates made to the Draft Development Consent Order

The Applicants would also like to highlight that significant commitments have been made by the Project that are reflected in updates to the draft Development Consent Order submitted at Deadline 4 (C1/F06). These include, but are not limited to:

- a commitment to a maximum metre Above Ordnance Datum for the highest parts of the onshore substations (Requirement 5 of Schedules 2A & 2B),
- a reduction in construction working hours to exclude Saturday afternoons (13.00 – 19.00) (Requirement 14 of Schedules 2A & 2B),
- further clarity provided to Requirement 16 of Schedules 2A&2B with regards reinstatement, and
- a commitment to a defined operational noise limit for both onshore substations (Requirement 18 of Schedules 2A&2B).

Company Changes and Funding Statement

On 9 December 2024 it was announced that JERA Nex Limited and bp would join forces to create a new global offshore wind joint venture - JERA Nex bp Limited. This transaction was discussed at CAH 1, completed after CAH 2 closed on 1 August 2025, and was announced on 4 August 2025. As a result it could not be communicated at the recent hearings.

JERA Nex bp Limited combines JERA Nex Limited and bp's offshore wind portfolios and project management expertise to create a new standalone, equally owned joint venture with strategic commitment to grow and become a top tier global offshore wind developer and operator. bp and JERA Nex Limited have agreed to provide \$5.8bn of equity commitment for offshore wind investments committed to cross various jurisdictions before the end of 2030 including the Mona and Morgan Offshore Wind Projects.

All relevant documents for submission at Deadline 4 have been updated with this information and further detail is provided in a number of updated documents, in particular the Funding Statement (D1.3) which now provides details of both the new Morgan JV partners and the change in ownership of Morecambe Offshore Wind Farm Limited to Copenhagen Infrastructure Partners. Going forward these company updates will be made as documents are updated at subsequent deadlines.

As part of the update to the Funding Statement, the Applicants have included two replacement Annexes: D1.3 Morgan Offshore Wind Limited reports and D1.4 Morecambe Offshore Wind Ltd reports, to reflect the changes in ownership. Annex D1.3 includes financial statements for BP GAMMA HOLDINGS LIMITED and JERA NEX LIMITED, an additional submission document, D1.3.1, includes EnBW's consolidated financial statements for 2024 which are unchanged from those submitted at application but which could not be combined into the D1.3 document due to formatting protections.

Local Tourism Assessment

As stated at ISH 2 the Applicants' intention was to submit a local tourism assessment at Deadline 4, in response to the following:

- Issue Specific Hearing 1: Action Point 52 (REP1-046)
- ExQ1 Written Question 15.1.3 (REP3-056).
- Blackpool Borough Council Local Impact Report (REP1-068).
- Fylde Borough Council Local Impact Report (REP1-078).

Unfortunately, it has not been possible to complete the assessment in the time available. The Applicants consider it preferable for all parties to submit a completed assessment at Deadline 5 and will take the opportunity to consult with the relevant local authorities on the scope of the assessment. It may be possible to submit the assessment before Deadline 5; however, this will be at the discretion of the Examining Authority.

Where possible all submissions that state a Local Tourism Assessment would be submitted at Deadline 4 have been updated, however it is possible that some such references will remain (and so should be ignored).

Skills and Employment Plan

Following the acquisition of Morecambe Offshore Wind Limited by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (as detailed in the Funding Statement (D1.3/F02)) on 17 July 2025, Appendix B of the Outline Employment and Skills Plan (J31/F02) has been deleted to remove references to Flotation Energy's case studies. An updated OESP will be submitted at Deadline 5 with a new Appendix B which will summarise previous actions and initiatives CIP have instigated or are currently developing to boost education, skills and employment in the renewable energy sector.

Submission of an Outline Landfall Construction Method Statement

In response to discussions with stakeholders, including Natural England, the Applicants will be submitting an outline landfall construction method statement into the Examination and securing it within the draft DCO. However, it has not been possible to prepare the document in time for Deadline 4. Therefore, and as noted in the Applicant's submissions, subject to the discretion of the Examining Authority, the Applicants will submit the plan on the 22 August 2025 to allow for formal review of the plan by Natural England and other Interested Parties ahead of Deadline 5 and ensure the Applicants can address any comments by Deadline 6.

Other Document Updates for Deadline 5

In addition, updates to the following documents will be submitted at Deadline 5:

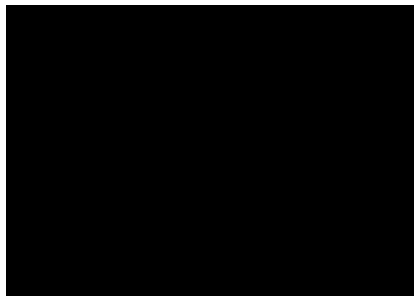
- Report on Interrelationships with other infrastructure projects (REP1-057)
- Review of CEA and In Combination Assessment (REP2-043)

Kind regards,



Project Consent Manager

Morgan and Morecambe Offshore Wind Farms:
Transmission Assets project,
on behalf of Morgan Offshore Wind Limited



Consents Lead

Morgan and Morecambe Offshore Wind
Farms: Transmission Assets project, on
behalf of Morecambe Offshore Windfarm Ltd