



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Deadline 5 Cover Letter

Deadline: Deadline 5
Application Reference: EN020028

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Prepared for:

Morgan Offshore Wind Limited,
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22 September 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 5.

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

Application Guide

The Applicants have updated the Application Guide (A4 F09) and have provided a clean and a tracked version. The updated Application Guide contains a complete list of documents comprising the Applicants' Deadline 5 submission.

Examining Authority's Written Questions (EXQ2) and commentary and questions on the draft DCO

The Applicants have reviewed each of the Examining Authority's written questions and requests for information (ExQ2) and provide responses in the document S_D5_5: Applicants' response to EXQ2 and its accompanying annexes:

- Annex 5.1 to Applicants response to ExQ2 1.1.3: Construction Scenarios (S_D5_5.1)
- Annex 5.2 to Applicants response to ExQ2 1.1.7: Mitigation Hierarchy (S_D5_5.2)
- Annex 5.3 to Applicants response to ExQ2 4.1.14, 4.1.18 and 4.1.20: Technical Note: Bird Strike Policy Note (S_D5_5.3)
- Annex 5.4 to Applicants Response to ExQ2:5.1.14: Morgan Company accounts (S_D5_5.4)
- Annex 5.5 to Applicants response to ExQ2 5.1.14: Morecambe Company accounts (S_D5_5.5)
- Annex 5.6 to Applicants response to ExA Q2 12.1.3: Land Holdings Detail (S_D5_5.6)

The Applicants have responded to the Examining Authority's commentary and questions on the draft development consent order issued on Monday 8 September 2025 (PD-012) within document Applicants' response to The Examining Authority's commentary and questions on the draft development consent order (S_D5_7).

Landscape and Visual and Green Belt Statements of Common Ground

The Applicants note the ExA's request at Q2.13.1.1 (PD-011) for an update on the Statements of Common Ground for landscape and visual and Green Belt matters (SoCG) at Deadline 5, as per the schedule provided at Deadline 4 (REP4-110).

Between ISH3, Deadline 4 and Deadline 5, the Applicants have been engaging constructively with Fylde Borough Council (FBC), Lancashire County Council (LCC), South Ribble Borough Council (SRBC) and Preston City Council (PCC) to progress SoCG discussions and have now prepared draft SoCG documents which address the key topics, namely Landscape and Visual Impact (LVIA), Outline Design Principles (oDP), and the Outline Landscape Management Plan (oLMP) and the Green Belt. The draft SoCGs seek to set out the matters agreed, and those that remain under discussion, supported by appropriate explanation and justification to ensure transparency for the Examination.

These draft SoCGs were shared with the Councils for their review and comment ahead of ISH4.

Drafts of these SoCGs are now provided at Deadline 5 to demonstrate to the Examining Authority the progress made to date. However, it should be noted that these are likely to be subject to further updates when comments are received by the relevant authorities. The Applicants intend to submit final SoCGs for these topics at D6.

FBC's comments on the SoCG in relation to LVIA and Design reflect the current committed position (i.e. those documents which form a formal part of the examination) and therefore do not fully align with ongoing discussions. The Applicants have made good progress with FBC in a face-to-face meeting on 10 September and FBC provided a positive comment on this in their written response to the Examiners' Questions issued at D5. FBC have indicated that they will continue to work with the Applicant with the aim of achieving a more agreeable position within the SoCG for Deadline 6.

Draft Statement of Common Ground with Preston City Council

The Applicants have drafted Preston City Council's position in relation to air quality based on Preston City Council's Relevant Representation (RR-1775) submitted on 27 January 2025. The Applicants have also drafted Preston City Council's position on landscape and visual resources as explained above. The Applicants have sought to have a meeting with Preston City Council to discuss all matters within this SoCG. However, Preston City Council have not responded to attempts to organise this. The Applicants will continue to endeavour to arrange this and submit an agreed SoCG during the examination phase.

Joint Statement with BAE Systems and the Defence Infrastructure Organisation

Since Deadline 4, BAE Systems and the Applicants have had several meetings to discuss the key matters outlined in the SoCG. These discussions have primarily focused on the potential for the Transmission Assets to attract a greater number of birds or alter their patterns of use within the 13 km wildlife safeguarding area. More recently, the Ministry of Defence (the Defence Infrastructure Organisation, DIO) has also become involved in these discussions.

A decision has been made to submit a joint SoCG between the Applicants, BAE and the MoD, which will be provided at Deadline 6. In support of the positive discussions the Applicants have submitted a Wildlife Attractants Risk Assessment, appended to the outline Wildlife Hazard Management Plan (S_D3_8/F02), at Deadline 5, which incorporates comments and feedback from both BAE Systems and MoD (DIO). Formal feedback is expected following their detailed review, including input from the MoD's subject matter expert. To facilitate progress, a meeting has been scheduled on 3rd October 2025 ahead of the next Issue Specific Hearing to discuss the submitted assessment and agree on a coordinated approach to next steps.

Blackpool Airport Bird Strike Risk Assessment and Cooperation Agreement

Blackpool Airport Operations Limited (BAOL) have reviewed the draft Blackpool Airport Bird Strike Risk Assessment, included as Appendix B within the outline Wildlife Hazard Management Plan submitted at Deadline 5 (S_D3_8/F02), and confirmed today (22 September 2025) that they are satisfied that the management plan references sufficient design constraints for the mitigation areas, assesses the works areas and provides suitable mitigations by species- combined with an ongoing monitoring program and escalation

process (should hazardous bird flight lines appear and / or bird numbers become excessive). Minor amendments have been requested by BAOL in order to make the risk assessment appropriate to integrate into the existing Blackpool Airport WHMP. These updates will be undertaken for submission at Deadline 6.

The Applicants note that this confirmation from Blackpool Airport was provided today (22 September 2025) and was therefore too late to be reflected in responses to ExA Q2.

In response to ExA Q 2.4.1.4 the Applicants can also confirm that the Cooperation Agreement has now been entered into with BAOL which sets out the terms on which the parties will cooperate and work together in order to deliver works within Blackpool Airport in a manner which allows safe, efficient and uninterrupted airport operations.

Updates to the Outline Design Principles

An interim update to the outline Design Principles (oDP, J3/F02) is submitted at Deadline 5. This reflects ongoing discussions with Fylde Borough Council, Lancashire County Council, Preston City Council and South Ribble Borough Council since Deadline 4, together with matters arising from ISH2 and subsequent written exchanges during the Examination.

The Deadline 5 interim update clarifies the pre-consent design position and sets out governance arrangements for post-consent design, consistent with the oDP's role in discharging Schedules 2A and 2B of Requirement 4 of the draft Development Consent Order (dDCO) in relation to substation design. The oDP also incorporates enhanced Project-Level Design Principles and Design Codes, strengthening alignment with good design objectives and with the specific elements of design identified in Requirement 4 of the dDCO.

Constructive engagement, including in-person meetings with Fylde Borough Council and Lancashire County Council, has sought to address previous issues raised by the Councils. While areas of disagreement remain, as recorded in the draft SoCG submitted at Deadline 5, the process demonstrates clear progress towards narrowing differences and establishing a transparent framework for post-consent discharge of Requirement 4 to secure good design outcomes.

The Applicants and the Councils continue to work towards a finalised version of the oDP for submission at Deadline 6.

To facilitate the final update of the oDP for Deadline 6, the following programme is proposed following Deadline 5. The proposed dates reflect recent discussions with Council representatives and may be supplemented by further meetings, as necessary.

Delivery timetable for finalisations of oDP for Deadline 6

Date	Action
Mon 22 Sept	Submission of interim update of the oDP document, providing greater clarity on the pre-consent design position and setting out governance arrangements for post-consent design. This update is consistent with the oDP's role in the discharge of Schedules 2A and 2B of Requirement 4 of the draft Development Consent Order (dDCO) (C1/F07) in relation to substation design. The interim update reflects constructive engagement with FBC, as the authority responsible for discharging Requirement 4, and with LCC, progressing several issues identified by the Councils between Deadlines 4 and 5.
Tues 23 Sept to Fri 26 Sept	The Applicants continue to update the oDP document, incorporating feedback received from FBC and LCC during and following meetings held between Deadlines 4 and 5. The Applicants will submit the updated document to the Councils on Friday 26 September.
Mon 29 Sept to Thurs 2 Oct	The Councils to review the updated document and return comments by Thursday 2 October.

Fri 3 Oct	The Applicants to review the Councils' commentary in preparation for Issue Specific Hearings (ISHs) the following week and for potential discussions on related matters.
Mon 6 Oct to Fri 10 Oct	<i>Issue Specific Hearings.</i> The Applicants to update the oDP concurrently in light of ISH discussions.
Tues 14 Oct	The Applicants issue a <u>final draft of the updated oDP</u> to the Councils, reflecting final discussions. Councils to confirm acceptance and/or final comments by Thursday 16 October.
Fri 17 Oct to Tues 21 Oct	The Applicants to finalise the oDP document for Deadline 6, completing the internal review and sign-off process.
Wed 22 Oct	Submission of the updated oDP document for Deadline 6.

Outline Landscape and Landscape Management Plan

A further update to the ***outline Landscape Management Plan*** (oLMP) is also planned for Deadline 6 (in addition to the minor update at Deadline 5) to reflect matters addressed in the Landscape and Design Matters Technical Note (REP3-064) and ongoing engagement between Deadline 5 and 6.

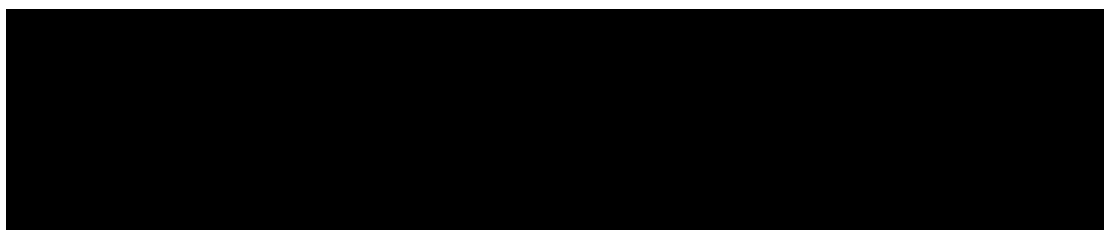
NFU Statement of Common Ground

Despite efforts from the Applicants the NFU have not been forthcoming with a response or negotiation on the statement of common ground and therefore the Applicants are not in a position to provide an updated position at deadline 5 from the deadline 4 position. The Applicants will continue to seek engagement with the NFU in hope to resolve matters and can discuss any points with the Examining Authority during the hearings as required.

Morgan OWL new Consent Lead

Morgan OWL would like to make the Examining Authority aware of a change of consent lead; Gareth Lewis is the new Morgan OWL Strategic Consents Lead going forward.

Kind regards,



Strategic Consents Lead

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