



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Decision Stage Update Letter to the Secretary of State



Deadline: Decision Stage
Application Reference: EN020028

MRCNS-J3303-JVW-19128
MOR001-FLO-CON-CAG-LET-0011

Document reference: S_SoSQ_1

30 January 2026
F01

| Document status | | | | | |
|------------------------|---|--------------------|--------------|--------------------|--------------|
| Version | Purpose of document | Approved by | Date | Approved by | Date |
| F01 | Update Letter to the Secretary of State | GL | January 2026 | AB | January 2026 |

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30 January 2026

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

Update – end of Examining Authority recommendation period

This letter provides an update on pertinent matters since the close of Examination in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO application. It is requested that it is provided to the Secretary of State, following delivery of the Examining Authority's (ExA's) recommendation report yesterday, 29 January 2026.

1. Status of Morecambe Offshore Windfarm Generation Assets Order 2025

Development consent for the Morecambe generation assets has been granted by the Morecambe Offshore Windfarm Generation Assets Order 2025 which came into force on 23 December 2025. This follows the granting of development consent for the Morgan generation assets by the Morgan Offshore Wind Project Generation Assets Order 2025 which came into force on 22 September 2025. The undertaker with the current benefit of each of these Orders is Morecambe Offshore Windfarm Ltd (Morecambe) and Morgan Offshore Wind Limited (Morgan) respectively.

Development consent is therefore in force for both generating stations intended to be connected to the National Grid by the Morgan and Morecambe Offshore Wind Farms: Transmission Assets.

Morecambe has also on Friday 16 January 2026 entered into a lease with The Crown Estate (TCE) in respect of the Morecambe generation assets, stepping through from the Agreement for Lease entered into pursuant to the TCE's Round 4 offshore wind leasing process.

2. Morgan Offshore Windfarm AfL Update

Morgan's parent companies (EnBW Energie Baden-Württemberg AG and Jera Nex BP) (the Morgan JV) have decided not to proceed with the Agreement for Lease for the Morgan Offshore Wind Project.

The Applicants have been advised that TCE is considering their next steps in respect of the Morgan project with the aim to ensure the continued development of the site, which would be by another developer. TCE view the Morgan project as a continuing and live project and support the DCO being considered as such.

It is common in the (highly regulated) UK energy sector for the developer to change in the course of the development of an offshore windfarm.

The Morgan JV is committed to working collaboratively in accordance with the terms of its obligations under its agreements with TCE.

This announcement does not affect the Morecambe project in any way, whose parent company remains fully committed to delivery of the Morecambe project.

3. Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO Application Update

In considering the context of these updates, it is important to be clear on the approach taken to the development of the two transmission projects. A range of scenarios have always been envisaged for how the two projects will progress, and the Application has been carefully designed to ensure that all scenarios, including a single project only scenario, are robustly provided for. The position is summarised in this section 3.

Two Projects of National Significance in one DCO

The Morecambe and Morgan transmission assets are both individually projects of national significance requiring a DCO, as directed by the Secretary of State at the outset of the development process.¹

They are electrically and commercially separate transmission systems connecting two separate nationally significant infrastructure generation projects - the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets – to their respective contracted points of connection to the National Grid Electricity Transmission system at Penwortham. This distinct separation is made clear throughout the Application and was explained in detail during Examination. For example, see Paragraph 1.2.1.1 of the Explanatory Memorandum (REP6-016):²

“[the Application is] for the construction of two electrically independent transmission systems (referred to as Project A and Project B in the Order)”

Given the electrical and commercial independence, the Applicants' consistent position is as set out in paragraph 1.4.1.6 of the Explanatory Memorandum (REP6-016):³

“it is vital that Project A and Project B can be delivered independently of each other and that the Order secures this”

To reflect and preserve this independence, the draft Order (REP6-013)⁴ is prepared as two separate grants of development consent for two separate projects housed in the same Order. This is a long-established approach for NSIPs in close proximity.⁵ Dogger Bank C and Sofia offshore wind farms are an example of the successful delivery of two separate projects by two entirely separate promoters (Dogger Bank C by SSE, Equinor and Vårgrønn and Sofia by RWE) at different times, authorised by the same Order.

An illustrative example of the drafting separation from the draft Order is the Article which grants development consents itself:

“Development consent etc. granted by the Order

¹ Secretary of State Direction under Section 35 of the Planning Act 2008 dated 4 October 2022 states ([EN020032-000373-S35](#)) : “THE SECRETARY OF STATE DIRECTS that the proposed project (the transmission infrastructure for the Morgan and Morecambe Offshore Wind Farms, together and individually) is to be treated as development for which development consent is required.” (emphasis added)

² [EN020032-002523-C3 MMTA Explanatory Memorandum F08.pdf](#)

³ See also response to ExA questions ([PD-008](#)), which respond to questions why greater levels of integration in design and timing of delivery is not possible ([REP3-056](#)).

⁴ [EN020032-002520-C1 MMTA draft Development Consent Order F09_Clean.pdf](#)

⁵ For example The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015 (being implemented as: (1) the Dogger Bank C windfarm by SSE, Equinor and Vårgrønn; and (2) the Sofia windfarm by RWE) and The Sheringham Shoal and Dudgeon Extensions Offshore Wind Farm Order 2024

3.—(1) *Subject to the provisions of this Order including the requirements—*

(a) Morgan is granted development consent for Project A to be carried out within the Order limits identified for Project A on the works plans; and

(b) Morecambe is granted development consent for Project B to be carried out within the Order limits identified for Project B on the works plans.”

This approach extends throughout the DCO Schedules where each project has separate obligations, in separate 'Project A' and 'Project B' schedules where appropriate, including separate schedules of requirements and separate deemed marine licences. The protective provisions are similarly separated (and where side agreements have been entered into, these have been entered into individually by each project). The plans, including the works plans and land plans, and the mitigation areas as appropriate, are similarly drafted with clear demarcation of Project A and Project B. This approach ensures that the DCO can be implemented in full (both projects) or in part (only one project).

Scenarios assessed - one project only, both together, or both sequentially

Three possible delivery scenarios – only one project in isolation (Scenario 1), both together concurrently (Scenario 2), or both sequentially (Scenario 3) – have underpinned project design, site selection, consultation, acceptance and examination. These scenarios formed the basis of the maximum design scenario for the purposes of the EIA and other assessments which form part of the Application. This approach ensures that the reasonable worst case has been assessed, examined and consulted upon ensuring that there are no unassessed environmental effects, whatever the eventual delivery scenario.

See for example Section 1.3 of the Explanatory Memorandum (REP6-016) (and for more detail see explanations of the assessment of the different scenarios submitted to Examination (Documents AS-070, REP1-060, and REP5-131)):

“The three construction scenarios forming the basis of the maximum design scenarios for purposes of the EIA are as follows:

• *Scenario 1: In isolation*

– This scenario considers the construction of transmission assets for one project in isolation, assuming that the other project does not proceed. It includes:

- *Project A only – The construction of transmission assets exclusively for the Morgan Offshore Wind Project: Generation Assets.*
- *Project B only – The construction of transmission assets exclusively for the Morecambe Offshore Windfarm: Generation Assets.*

• *Scenario 2: Concurrent Construction*

– This scenario considers the simultaneous construction (same start or finish) of the Transmission Assets for both Project A and Project B at the same time.

• *Scenario 3: Sequential Construction*

– In this scenario, the construction of the Transmission Assets is carried out sequentially, where one project’s transmission assets are completed before the other begins. The scenario is further subdivided into:

- *Immediate Sequential Construction – Where the second project’s construction begins immediately after the first project’s transmission assets are completed, with no delay.*
- *Sequential Construction with a Gap – Where there is a gap of up to four years between the completion of the first project’s transmission assets and the commencement of construction for the second project.”*

Mitigation Secured for each Project Individually

Mitigation (and monitoring) measures proportionate⁶ to each Project are secured through separate Project A and Project B schedules of requirements in the draft Order, developed in consultation with stakeholders on the basis of the reasonable worst case EIA and other assessments. This approach ensures that, regardless of the delivery scenario, the mitigation hierarchy has been applied and the reasonable worst case residual significant effects have been identified, and that each project is always responsible for its own mitigation measures.

Separate Compulsory Acquisition Powers

For the avoidance of doubt, the compulsory acquisition and temporary powers sought by the draft Order are similarly delineated between Project A and Project B. Article 33 of the draft Order provides a separate obligation on each party that it may not exercise these powers without approval from the Secretary of State who must first be satisfied that funding for its liabilities is in place – so the funding progress of each project must be separately approved before either undertaker can exercise any CA powers for their project.

The draft DCO provides in Article 21 that each project has a separate time limit to implement its CA powers, so in Scenario 1 if only one project proceeds then the CA powers for the other will lapse.

Point of Connection

Also for the avoidance of doubt, the Applicants reiterate that each project was separately offered a grid connection agreement for a connection to the existing National Grid substation at Penwortham. The Applicants each accepted and entered into their connection agreements, fully mindful of the three delivery scenarios – only one project, both together or both sequentially. In response to suggestions by interested parties, the Applicants have explained in detail during Examination why it's not possible or appropriate to develop and examine alternative projects connecting elsewhere (for example Stanah), and this remains the case for the projects whether considered individually or together.

It is noted that NESO is continuing to identify Penwortham as the connection point for future offshore wind projects, including the East Irish Sea Transmission project⁷ (which is not currently part of the Holistic Network Design or other strategic planning exercises).

Co-ordination

The Applicants continue to support the Government's aim for co-ordination, as set out in the National Policy Statements and facilitated by the work of NESO in the Holistic Network Design and other documents. A scenario where Morecambe proceeds before Morgan (Scenario 3) or as the only project (Scenario 1) are now the more likely scenarios following the Morgan JV decision not to proceed with the Agreement for Lease. Importantly, the detailed design of the projects ensures that in all scenarios two parallel offshore connection projects can be delivered for connection to Penwortham, minimising proliferation of infrastructure in the area. As such, the aims of co-ordination in the co-ordinated design are realised in all scenarios, whether in Scenario 1 (single project) leaving proven space for another project in the future, or in Scenarios 2 or 3.

To reach this point has taken unprecedented levels of work and co-operation between two independent developers, which has enduring benefits - a carefully designed and deliverable connection corridor for two projects is a clear benefit of the design in all Scenarios.

4. Conclusion on Items 1 - 3

In relation to the Morecambe Generation DCO, the draft Order contains Article 3(2) making it conditional upon grant of development consent for the Morecambe generation assets. This drafting can now be removed.

⁶ Noting that Morecambe generation is 480MW and up to two cables are required, and Morgan generation is up to 1500MW and up to 4 cables are required

⁷ [East Irish Sea Transmission Project - Project information](#)

In relation to the Morgan JV decision, it was a possibility from the outset that only one project may be delivered due to the nature of the UK energy sector. This is expressly set out and methodically considered in the Application and all assessments, and the draft Order has been carefully drafted so that each project is clearly and easily independently deliverable (with each project consent separately lapsing if the limit expires⁸). All necessary mitigation for each project has been secured proportionately for that project individually, where appropriate, by the draft DCO. The Secretary of State can be satisfied that the (minimal) residual impacts identified in the EIA are outweighed by the benefits, for all three assessed Scenarios (including Morecambe individually), and so can be satisfied that the case has been made for development consent to be granted for the two projects comprised in the Application, both together or individually.

The Applicants appreciate that the Secretary of State will consider carefully the Morgan JV's position, but as noted above it is considered reasonably foreseeable that the project will be developed. The Morgan project has been in development for over five years, and has secured a DCO for the generation assets, and so a refusal of the Morgan transmission assets would be at best a significant delay to the delivery of the Morgan project and is highly likely to end its ability to contribute to Clean Power 2030⁹ and Net Zero.

The Applicants also appreciate that the test for the Secretary of State to confirm CA powers ("compelling case in the public interest"¹⁰) is distinct from the grant of development consent (which is akin to planning permission settling the principle of the scheme). However, it is still considered open to the Secretary of State to grant CA powers as part of the DCO for both projects, given that for the reasons set out above delivery by another party is reasonably foreseeable and there is no known impediment to this. The pre-requisite to demonstrate funding to the Secretary of State's satisfaction (Article 33 of the draft DCO, discussed above) is also relevant, ensuring that all persons interested in land will be fully compensated for any impact from each project.

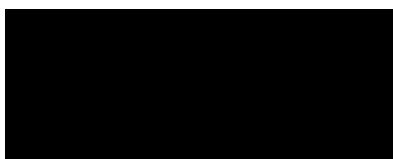
If the Secretary of State was minded only to grant development consent to the Morecambe transmission project, there is no impediment to doing so. As set out above: a one project only scenario was one of the three scenarios assessed and consulted on; the mitigation required for each project is separately and proportionately secured; the overall policy conclusions apply to the projects together or individually; and the DCO is drafted as a 'two-in-one' Order. This approach, which anticipates the partial implementation of the made Order, also equally allows for the partial grant the Order (to authorise one project only) with straightforward drafting modifications. As also set out above, both the Morecambe generation and transmission assets are Critical National Priority projects in their own right.

The Applicants together or individually will of course respond promptly and fully to any information requests the Secretary of State may have.

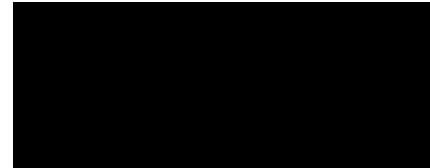
Kind regards,

Gareth Lewis

Andrew Blyth



Strategic Consents Lead



Strategic Consents Lead

⁸ As well as the time limit on CA powers, requirement 1 in both the Project A Project B schedule of requirements in the draft Order provides an individual time limit for commencement of each project of seven years.

⁹ [clean-power-2030-action-plan-main-report.pdf](#)

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

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