



## MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' February update letter to the Secretary of State



Deadline: Decision Stage  
Application Reference: EN020028

MRCNS-J3303-JVW-00103  
MOR001-FLO-CON-CAG-LET-0012

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12 February 2026  
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F01	Update Letter to the Secretary of State	GL	February 2026	AB	February 2026

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**Prepared by:**

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

**Prepared for:**

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

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12 February 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**

On the 30 January 2026 the Applicants provided an update to the Secretary of State in relation to the status of the Morecambe Offshore Windfarm Generation Assets Order 2025, Morgan Offshore Windfarm Agreement for Lease and the Morgan Joint Venture's position. As confirmed within that update, the Applicants continue to work on matters that were outstanding at the close of Examination.

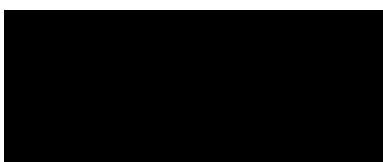
The attached technical note provides a further update on pertinent matters since the close of Examination in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO application. It is requested that it is provided to the Secretary of State.

The Applicants 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

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



Strategic Consents Lead

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



## MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants February update technical note to the Secretary of State



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Application Reference: EN020028

MRCNS-J3303-JVW-00104  
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**Prepared by:**

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

**Prepared for:**

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

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## Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.  For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

<b>Term</b>	<b>Meaning</b>
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between JERA NEx bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.

Term	Meaning
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning. Also referred to in this report as the Offshore Order Limits, for ease of reading.
Transmission Assets Order Limits: Onshore	The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds). Also referred to in this report as the Onshore Order Limits, for ease of reading.

## Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
DML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario

Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
Pol	Point of Interconnection
PPP	Pollution Prevention Plan
PRoW	Public rights of way
QBAR	Mean annual maximum flow rate from a rural catchment (approximately a 1 in 2 year event)
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

## Units

Unit	Description
%	Percentage
dB	Decibels

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<b>Unit</b>	<b>Description</b>
Kg	Kilogram
kHz	Kilohertz
KJ	Kilojoules
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
m	Metres
m <sup>2</sup>	Metres squared
m <sup>3</sup>	Metres cubed
nm	Nautical mile
µPa	micropascal

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## 1.1 Introduction

On the 30 January 2026 the Applicants provided an update to the Secretary of State in relation to the status of the Morecambe Offshore Windfarm Generation Assets Order 2025, Morgan Offshore Windfarm Agreement for Lease and the Morgan Joint Venture's position. As confirmed within that update, the Applicants continue to work on matters that were outstanding at the close of Examination.

The purpose of this document is to provide an update on a number of matters relevant to the determination of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO application.

In addition to the matters below the Applicants are continuing to engage with relevant Interested Parties on other matters that were outstanding or unresolved at the end of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets Examination, and would be happy to provide an update on those matters to the Secretary of State on request.

## 1.2 S135 Consent

Further to the Applicants' update at Deadline 7 (REP7-040) the Applicants have continued to engage with The King's Most Excellent Majesty In Right of His Duchy of Lancaster, His Majesty's Coastguard and Secretary of State for Transport regarding the agreement of their Section 135 consents.

The Applicants have been advised by His Majesty's Coastguards' agent on the 13 January 2026 that the consent was in an agreed form and due to be signed by His Majesty's Coastguards, the Applicants anticipate the return of this imminently.

The Applicants have continued discussions with the Secretary of State for Transport and believe that the parties can reach an agreed position on the Section 135 consent in advance of the Secretary of State's deadline for making his decision.

Negotiations have continued with The King's Most Excellent Majesty In Right of His Duchy of Lancaster including an in-person meeting on the 8 January 2026 where positive progress was made on the commercial agreement needed and Section 135 consent. The Applicants consider that the discussions to date have been constructive and have helped to clarify the parties' respective positions in relation to the Section 135 consent, with discussions continuing.

## 1.3 Protective Provisions

Further to the Applicants' update at Deadline 6 (REP6-139) and at Deadline 7 (REP7-042) as part of the Applicants' closing statement, the Applicants provide the following updates on the required Protective Provisions (PPs). With the exception of the Lead Local Flood Authority, which is close to a positive conclusion, the Applicants have reached agreement with all relevant statutory undertakers and the criteria in section 127 and section 138 of the Planning Act 2008 are satisfied.

### GTC Pipelines

The Applicants confirm that they have entered into their respective confidential agreements with GTC. The Applicants understand that GTC have withdrawn their relevant representation.

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### National Gas Transmission PLC

PPs are agreed and National Gas confirmed withdrawal of their objection on 24 October 2025 (REP7-073).

### Network Rail Infrastructure Limited

The Applicants are pleased to confirm these PPs are agreed and each of the Applicants has entered into their respective framework agreement with Network Rail. The Applicants have been informed by Network Rail that they have written to the Secretary of State on 19 January 2026 to formally confirm withdrawal of their objection.

### National Grid Electricity Transmission

The Applicants are pleased to confirm that each of the Applicants has entered into their respective confidential agreements with NGET. The Applicants understand that NGET has written to the Secretary of State on 14 January 2026 to withdraw their objection to the Transmission Assets.

### Lead Local Flood Authority

Conversations with the Lead Local Flood Authority (LLFA) have been progressing positively. Only one outstanding commercial point remains to be resolved in relation to the indemnity provisions.

The Applicants anticipate that they will have resolved all matters with the LLFA very shortly. The Applicants note that as part of the PP negotiations the Applicants and the LLFA have agreed an accompanying amendment to Article 7 of the draft DCO. The Applicants expect to be in a position to provide both an agreed form of updated protective provisions and the agreed amendment to Article 7 in response to any request for further information by the Secretary of State.

## **1.4        Update on land agreements**

Since the submission of the final Land Rights Tracker (REP7-032) the Applicants have agreed a total of 64 sets of heads of terms which is an additional 16 since deadline 7, and represents 62% of the cable route. These agreements are now with the respective parties' solicitors to progress the voluntary agreements.

The Option Agreement with the Hornbies Foundation for the freehold acquisition of plots 11-125A, 11-126A, 12-029A, 11-109B, 13-008B, and 13-009B completed on the 18 December 2025 (these being the plots required for the whole of the Morecambe substation and part of the Morgan substation).

The Applicants will of course provide a full update on progress in response to any request for information by the Secretary of State.

## **1.5        Section 106 relating to Blackpool Road Recreation Ground**

The Applicants have continued to progress negotiation of the section 106 agreement (s106 agreement) with Fylde Borough Council (FBC), which secures the appropriate mitigation for temporary construction impacts at Blackpool Road Recreation Ground (BRRG S106.)

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The Applicants can provide a more detailed summary of their ongoing engagement efforts as an update to the Section 106 Memorandum (REP7-038) in response to any request for further information by the Secretary of State.

Following the close of Examination, FBC has made the Applicants aware that, whilst they will continue to negotiate the terms of the BRRG S106, they are not prepared to enter into it at this time. FBC has reiterated its position to the Applicants that they are seeking a s106 agreement which includes additional contributions and obligations which are unrelated to the mitigation measures required for construction impacts at the Blackpool Road Recreation Ground. The Applicants' position remains that FBC's request to provide for additional contributions within a s106 agreement are neither appropriate, nor compliant with relevant policy, especially paragraph 4.18 of NPS EN-1. The Applicants maintain that those obligations are not necessary to make the development acceptable in planning terms, as all relevant impacts have already been appropriately mitigated.

The Applicants provided information on this during Examination (see for example REP6-169) and have recently provided further detailed explanations to FBC following continued post-examination engagement to try and resolve this matter. Given FBC's current position that they will not enter into a s106 agreement unless it goes beyond the measures required for the Blackpool Road Recreation Ground at this time, the Applicants wish to update their position in relation to the Blackpool Road Recreation Ground requirement (Requirement 28 of Schedules 2A and 2B of the Applicants' draft DCO (REP6-013)). The Applicants are no longer presenting this requirement on a without prejudice basis. The Applicants recognise that delivery of a completed s106 obligation is necessary to include in any made Order, to secure delivery of appropriate mitigation measures for Blackpool Road Recreation Ground before works are commenced at that location.

Active discussions are ongoing with FBC as to the terms of any s106 obligations.

## **1.6        EPS licence for Sand Lizards**

The Applicants are pleased to confirm that the draft sand lizard mitigation licence application made to Natural England on the 14 October 2025 has now been accepted. Natural England confirmed in their letter dated 2 February 2026, that it sees no impediment to a licence being issued, should the DCO be granted. A letter from Natural England confirming this is attached as Annex 1.

## **1.7        Blackpool Borough Council**

In relation to matters at close of Examination with Blackpool Borough Council (BBC) as landowner, the Applicants have the following updates on negotiations.

Negotiations with BBC are ongoing and have been positive. The Applicants have made progress in relation to heads of terms for a cable easement at the Saint Anne's Sand Dunes ("the dunes") and await a confirmation from BBC as to next steps. A licence for access to the Starr Gate Lane has been agreed allowing the Applicants non-exclusive use of the privately owned slipway.

The Applicants have worked with BBC to develop detail around areas of interaction between the cable corridor and the proposed solar farm to the south of Blackpool Airport during construction and post-installation. BBC are providing further detail

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around the proposed solar farm including updated layouts and programme to assist the Applicants in assessing whether further mitigations are required to reduce any likely impact. Heads of terms are being prepared which are expected to mirror much of the terms in those provisionally agreed for the dunes.

## 1.8 Onshore ornithology

Notwithstanding the Applicants position at the end of examination (REP7-042), the Applicants have continued to engage constructively with Natural England in relation to onshore ornithology matters. Further technical information has been provided to Natural England regarding the proposed alternative mitigation measures included in Appendix H of the Outline Ecological Management Plan at Deadline 6 (REP6-115) to address temporary habitat loss and disturbance impacts during construction. A technical meeting was also held on 20 January 2026 to discuss Natural England's feedback on the Applicants' mitigation proposals.

Through this ongoing engagement, Natural England has been consulted on the Applicants' proposed approach to avoiding temporary disturbance impacts on the Ribble and Alt Estuaries Special Protection Area (SPA) features during construction. The Applicants consider that such impacts can be avoided through the alternative mitigation measures included within the Outline Ecological Management Plan, with the detailed implementation to be agreed post-consent within the final Construction Noise and Vibration Management Plan.

The Applicants have also confirmed commitments to temporary habitat reinstatement measures during relevant seasonal periods, proportionate to the nature and duration of the works. This approach has been discussed with Natural England, and any minor clarifications could be secured through the Outline Ecological Management Plan.

Engagement continues and further updates will be provided to the Secretary of State upon request. The Applicants consider that a positive resolution on onshore ornithology matters can be achieved through continued engagement with Natural England.

## 1.9 Warton Aerodrome

### Engagement

The Applicants have met with BAE and MOD on 2 December 2025 to progress matters in relation to bird strike risk. A further meeting was scheduled with the Applicants and their subject matter experts, but this was cancelled as BAE/MOD had not had an opportunity to meet internally with their subject matter experts. A further meeting is scheduled with BAE on 13 February 2026 to discuss the approach to deal with the remaining outstanding issues. The Applicants remain confident that there is a solution that will ensure the interests of both parties are appropriately managed.

### Data and information

As noted during Examination, BAE were to provide a number of data sets and information on how they currently manage bird strike risk following completion of a Non-Disclosure Agreement (NDA). The NDA was signed and returned to the Applicants on 13 November 2025. The Applicants have since requested the data sets, and at the meeting on 2 December 2025, BAE noted that the data to be shared would not be the full suite of information that the Applicants were previously informed would

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be shared. BAE agreed to share how they manage onsite and offsite bird strike risk and that they would provide the last 5 years of bird strike data at Warton. The Applicants were advised at the meeting on 2<sup>nd</sup> December 2025 that it would be provided by the end of January 2026 but the Applicants are still to receive this. The Applicants will continue to engage with BAE on this.

### **Bird Strike Risk Assessment**

It was made clear during Issue Specific Hearing 4 that a bird strike risk assessment would be required in order for BAE and MOD to fully understand the Project's impacts on bird strike risk at Warton. The Applicant's position remains that the Draft Wildlife Habitat Attractants Risk Assessment, (Appendix A of the Outline Wildlife Hazard Management Plan REP7-034) demonstrates that the works associated with the project will not increase bird strike risk and that the passive and active management controls ensure risk will be managed to stay below agreed limits.

Notwithstanding conclusions of the Draft Wildlife Habitat Attractants Risk Assessment the Applicants have attempted to carry out a bird strike risk assessment but are awaiting the data from Warton to complete it. The Applicants are willing to provide this assessment to the Secretary of State to demonstrate that the mitigation and management practices proposed within the Outline Wildlife Hazard Management Plan are appropriate to safeguard bird strike risk and which are secured through Requirement 27 of the draft DCO. The Applicants can provide the updates to the bird strike risk assessment, without the additional data awaited from Warton, to the Secretary of State and BAE upon request.

### **1.10      Marine Recovery Fund**

At Deadline 5, the Applicants provided an update to their without prejudice benthic compensation DCO Schedule (REP5-109). Following close of Examination, both The Norfolk Boreas Offshore Wind Farm (Amendment) (No. 2) Order 2025 and The Norfolk Vanguard Offshore Wind Farm (Amendment) (No. 3) Order 2025 were made. Additionally, on the 10 February 2026, the Outer Dowsing Wind Farm Order was made which includes requirements regarding the use of the Marine Recovery Fund. The drafting of these as made orders varies slightly compared to the Applicants' without prejudice submission and so, if requested, the Applicants are willing to provide updated without prejudice drafting that accords with as made orders.

### **1.11      Cable Burial Risk Assessment**

In the Statement of Common Ground (SoCG) with the Marine Management Organisation (MMO) submitted at Deadline 6 (REP6-130) it was confirmed by the MMO that further information provided by the Applicants at Deadline 6 '*is sufficient to justify the current proposals and that the Cable Burial Risk Assessment (CBRA) is reasonable and takes a balanced approach to the risk of coastal change*' (MMO.PP.11b).

The closing statement submitted by the MMO at Deadline 7 (REP7-048) however stated that '*in regard to cable burial and avoidance of cable protection, monitoring of the adjacent shorelines may still be appropriate if nearshore scour protection with significant potential to affect shoreline processes is deployed*' (paragraph 2.2.1).

Since the close of the examination the Applicants have engaged with the MMO on whether they consider that further monitoring is required, given this discrepancy

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between the submissions at Deadline 6 and Deadline 7. Through this engagement the MMO have confirmed that they failed to update their Deadline 7 response to match the SoCG, and that their final stance on the CBRA has been agreed, and no further actions are required from the Applicants at this stage. A letter from the MMO confirming this is attached as Annex 2.

## **1.12 Summary**

In relation to remaining outstanding matters the Applicants remain committed to working with the relevant parties to conclude matters prior to the Secretary of State's deadline for a decision being made. The Applicants together or individually will of course respond promptly and fully to any information requests the Secretary of State may have.

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## Annex 1: Sand Lizard Letter of No Impediment

Date: 02 February 2026  
Our ref: 2025-72460-EPS-NSIP  
(NATIONALLY SIGNIFICANT INFRASTRUCTURE  
PROJECT)



**Sent by e-mail only**

**Wildlife licensing**  
Natural England  
Horizon House  
Deanery Road  
Bristol  
BS1 5AH  
Email:  
[wildlife@naturalengland.org.uk](mailto:wildlife@naturalengland.org.uk)  
Tel: 020 8026 1089

**DRAFT LICENCE APPLICATION STATUS:** Subsequent Draft Licence Application

**LEGISLATION:** The Conservation of Habitats and Species Regulations 2017 (as amended), The Wildlife and Countryside Act 1981 (as amended)

**NSIP:** Morgan and Morecambe Winds Farms Transmission Assets

**SPECIES:** Sand Lizard (*Lacerta agilis*)

Thank you for your subsequent draft sand lizard mitigation licence application in association with the above NSIP site, received in this office on 22<sup>nd</sup> December 2025. As stated in our published guidance, once Natural England is content that the draft licence application is of the required standard, we will issue a 'Letter of No Impediment'. This is designed to provide the Planning Inspectorate and the Secretary of State with confidence that the competent licensing authority sees no impediment to issuing a licence in future, based on information assessed to date in respect of these proposals.

This advice is being provided as part of Natural England's Discretionary Advice Service input to the above-referenced NSIP site. The following advice is based upon the information within the relevant draft licence applications as detailed below:

- MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS Sand Lizard Survey Data Technical Note, dated 22<sup>nd</sup> October 2025
- Natural England Sand Lizard LONI Request for Further Information (RFI) – Summary of Discussions at Meeting (held on 08.12.25) and How the RFI Points Have Been Addressed Document, dated 22<sup>nd</sup> December 2025
- MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS Draft European Protected Species Mitigation Licence for Sand Lizard - Method Statement, dated 15<sup>th</sup> December 2025

Following our assessment of the resubmitted draft application documents, I can now confirm that, on the basis of the information and proposals provided, **Natural England sees no impediment to a licence being issued, should the DCO be granted**. However, please note the following issues have been identified within the current draft of the Method Statement and supporting documents that will need to be addressed before the licence application is formally submitted.

Please do ensure that the Method Statement is revised to include these changes prior to formal submission.

### **Named Ecologist Experience**

Natural England welcomes the recognition within the revised draft licence documents that the involvement of a suitably qualified and experienced ecologist will be required as part of the formal EPS mitigation licence application process. When the formal licence application is applied for, the individual applying to act as the Named Ecologist on the licence must be able to satisfy all the relevant criteria as required by Natural England to hold an A46 Mitigation Licence to derogate for impacts to sand lizards, either by presenting evidence of previously held similar licences, or, through the provision of appropriate and robust references and supporting professional competency information.

### **Survey Information**

The additional information provided by the Applicant regarding the likely population and number of sand lizards that may be impacted by the proposed works is noted. As indicated in our previous commentary, NE will require a realistic estimate of likely numbers of individual sand lizards that may be impacted by and encountered during the proposed works, which will inform the number to be included on the formal licence. Currently it is proposed for 10 individuals to be included on the formal licence submission. This number should be reviewed accordingly at the point of formal submission, and revised in line with any further and/or more salient population information available at the time.

### **Impact Assessment and Mitigation Measures**

Natural England notes the further detail provided regarding the likely impacts from works and activities associated with Temporary Compound 3 and the Beach Access Road. The commitment to avoid impacting sand lizard habitats at the most sensitive times of year around breeding and hibernation activities is welcomed, as are the proposed mitigation measures focused on pre-work checks by an appropriate ECoW (Ecological Clerk of Works) and the use of exclusion fencing to keep sand lizards out of the compound areas.

The further detail and clarity provided regarding the proposed translocation methodology and approach is also useful, and sufficiently addresses Natural England's previous comments regarding the capture approach, receptor site for translocated lizards, and a suitable contingency plan for the discovery of any torpid or injured sand lizards.

### **Compensation Measures and Post Development Works**

It is noted that no post-development habitat creation or enhancement measures have been proposed, nor any longer-term interventions focused on habitat management and maintenance, or monitoring focused on the population of sand lizards to be impacted. Whilst it is acknowledged that the effects of the proposed works have been designed to avoid impacts wherever possible, are largely temporary, and are localised to a small spatial footprint when compared with the wider suitable habitats available to sand lizards in the immediate environment, should further or more impactful activities be required as part of any licensed approach, and/or if significantly higher than the currently predicted numbers of sand lizards be found, translocated, or impacted as part of the planned works, then Natural England would expect a commitment to specific post-work interventions to ensure the Favourable Conservation Status of the affected sand lizards is robustly maintained. Such interventions should focus on proactive establishment and/or management of suitable sand lizard habitats, or, efforts to support ongoing monitoring work, either through survey work undertaken by the Applicant and their representatives themselves, or by an appropriate financial contribution to individuals or organisations already involved in such work, such as the Fylde Borough Council or Fylde Sand Dunes Project as referenced in the draft licence documents.

### **Next Steps**

Should the DCO be granted then the mitigation licence application must be formally submitted to Natural England. At this stage any modifications to the timings of the proposed works, e.g. due to ecological requirements of the species concerned, must be made and agreed with Natural England before a licence is granted.

If other minor changes to the application are subsequently necessary, e.g. amendments to the work schedule/s then these should be outlined in a covering letter and must be reflected in the formal submission of the licence application. These changes must be agreed by Natural England before a licence can be granted. If changes are made to proposals or timings which do not enable us to meet reach a 'satisfied' decision, we will issue correspondence outlining why the proposals are not acceptable and what further information is required. These issues will need to be addressed before any licence can be granted.

Full details of Natural England's licensing process with regards to NSIP's can be found at [http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/images/wml-g36\\_tcm6-28566.pdf](http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/images/wml-g36_tcm6-28566.pdf)

As stated in the above guidance note, I should also be grateful if an open dialogue can be maintained with yourselves regarding the progression of the DCO application so that, should the Order be granted, we will be in a position to assess the final submission of the application in a timely fashion and avoid any unnecessary delay in issuing the licence.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is, therefore, not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

I hope the above has been helpful. However, should you have any queries then please do not hesitate to contact me.

Yours sincerely,

Wildlife Licensing – Chargeable Advice and Strategic Casework  
Natural England Wildlife Licensing Service

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## Annex 2: MMO Letter



Our reference:  
DCO/2022/00010/PINS

[By email only]

28 January 2026

Dear Abby-Louise,

**RE: Examination Deadline 6 and Deadline 7 discrepancies by MMO**

Thank you for your request for clarification on the Morgan and Morecambe Transmission Assets (MMTA) examination responses from the MMO. It is noted that in a meeting with the MMTA team on 12 January 2026, the Applicant queried a discrepancy between the MMO's Deadline 6, Deadline 7, and Statement of Common Ground (SoCG) conclusions.

The MMO reviewed these responses, and we have outlined the following discrepancies below:

In deadline 6 (REP6-199), section 4.1.5 states:

*"The MMO notes that the Applicants have retained a slight equivocation in all discussion of commitments to cable burial and avoidance of cable protection at the shore (e.g., "... subject to further pre-construction surveys"). However, paragraph 1.10.5.3. states that no monitoring will be needed in the intertidal as they commit to not deploying cable or scour protection here. In view of the qualification of these commitments, it should be noted that monitoring of the adjacent shorelines may still be appropriate if nearshore scour protection with significant potential to affect shoreline processes is deployed. As noted in the baseline description, the landfall site is potentially variable in its accretionary/erosional behaviour, which can signify a shoreline close to an equilibrium with its physical forcing and also sensitive to minor changes in that forcing."*

In the MMOs SoCG deadline 6 update (MMO.PP.11b), we noted:

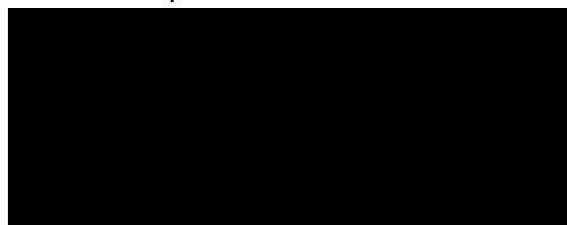
*"The Applicant has provided further information (due to be submitted at Deadline 6) and while the information does not necessarily answer every possible question, and the potential remains for the stable, and in sections accretionary, beach levels of the recent past to revert to a stated previous erosional behaviour, the assessment indicates that this is: (i) reasonably unlikely in the near term, and (ii) not necessarily something that will be*

*exacerbated by the resulting changes in cable burial. Further information linked to the Shoreline Management Plan can be found in our Deadline 6 response. The MMO believes that the further information provided is sufficient to justify the current proposals and that the Cable Burial Risk Assessment (CBRA) is reasonable and takes a balanced approach to the risk of coastal change. The MMO confirms that this status is now agreed."*

## **Conclusion**

Upon review of our advice, the MMO acknowledges that we failed to update our Deadline 7 response to match our SoCG conclusions. Therefore, the MMO confirms that our final stance on the matter of the CBRA has been agreed, and no further actions are required from the Applicant at this stage.

If you require any further information, please do not hesitate to contact me using the details provided below.



Marine Case Manager

