
To:
Agents SHP Valuers acting for Greenbank Farm
All Interested Parties
BAE Systems
Blackpool Borough Council
Canal and River Trust
Defence Infrastructure Organisation
Eastham Hall Farm
Fylde Borough Council
John Fare
His Majesty's Coastguard
Lancashire County Council
Morgan Offshore Wind Limited and Morecambe
Offshore Windfarm Limited
Natural England
The Crown Estate
The Duchy of Lancaster
The Secretary of State for Transport
Wrea Green Equitation Centre

Our Ref: EN020032

Date: 12 March 2026

Dear Sir or Madam,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (“the Applicants”) for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets (“the Proposed Development”)

REQUEST FOR INFORMATION

1. Following the completion of the Examination on 29 October 2025, the Examining Authority submitted a Report and Recommendation in respect of its findings and conclusions on the above application to the Secretary of State on 29 January 2026. In accordance with section 107 of the Planning Act 2008, the Secretary of State has three months to determine the application.

2. There are issues on which the Secretary of State requests that the parties identified below provide updates or information as appropriate.

Correspondence received from the Applicants since the close of the examination

3. The Applicants supplied updates to the Secretary of State on 30 January 2026¹ [PID-001] and 12 February 2026² [PID-002]. All **Interested Parties** are invited to comment upon these documents.

Onshore Ornithology and Bird Strike Risk to Aviation at Warton Aerodrome

4. **BAE Systems (BAE)** and **Defence Infrastructure Organisation (DIO)** are requested to confirm whether their bird strike risk concerns relate solely to the Newton-with-Scales site (Work No. 49A/49B) or all mitigation sites proposed by the Applicants.
5. The **Applicants** are requested to explain how Spatial Scheduling (H2, H32, H33, NE20 in [RR-1601]) has been applied to reduce disturbance of ornithological features of the Ribble and Alt Estuary Special Protection Area (SPA) and whether it can be further applied to reduce or avoid the need for mitigation areas and therefore reduce or avoid the risk of bird strike.
6. Noting the alternative mitigation measures summarised in Appendix H of [REP6-115] and the Applicants' post-Examination representation dated 12 February 2026 [PID-002], the **Applicants** and **Natural England** are requested to provide an update on discussions regarding alternative mitigation measures and whether implementing further avoidance measures could avoid the need for mitigation areas. The **Applicants** are requested to provide a further update to [REP6-115], as the Applicants suggested in [PID-002], to include commitments to temporary habitat reinstatement measures during relevant seasonal periods, proportionate to the nature and duration of the works.
7. The **Applicants, BAE** and **DIO** are requested to provide updates on their progress in seeking to resolve the outstanding disagreement regarding bird strike risk. **BAE** and **DIO** are requested to provide any comments on the Applicants' final outline Wildlife Hazard Management Plan ("oWHMP") [REP7-034, REP7-035] submitted at Deadline (D)7.
8. The Secretary of State notes that in [REP2-046] the Applicants ruled out the use of Newton Marshes Site of Special Scientific Interest (SSSI) as a mitigation area due to its proximity to Warton Aerodrome. However, he also notes that DIO's post-Examination submission of 6 November 2025 sets out a preference for the Newton-with-Scales mitigation area to be replaced by "a site south of Warton Aerodrome, ideally to the south of the estuary". The **Applicants** are requested to explain

¹ https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020032-002689-S_SoSQ_1_MMTA_Update_Letter_to_SoS_F01.pdf

² https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020032-002691-1-S_SoSQ_2_MMTA_February_Update_Letter_to_SoS_F01.pdf

whether any alternative mitigation areas have been, or could be, identified that would address this request.

9. The Secretary of State notes that DIO's post-Examination submission dated 6 November 2025 also states *"For a management plan to be effective in mitigating the potential increase in birdstrike risk it would need to ensure that no hazardous birds are utilising the Newton-with-Scales site above the levels that are currently present there"*. **DIO** and the **Applicants** are requested to comment on whether the DIO's concerns could be resolved by the oWHMP defining bird population levels and committing to triggers/thresholds for active management. The **Applicants** are requested to provide further information on triggers/thresholds for active measures within the oWHMP and whether it could commit to such thresholds at this point. The Secretary of State encourages the Applicants to consult with Natural England on the triggers/thresholds for active management to ensure they are set at a level which still allows the mitigation areas to be effective from an HRA perspective.
10. The Secretary of State notes that a Non-Disclosure Agreement has been entered into to enable the sharing of bird strike risk data sets but is concerned that little progress appears to have been made in resolving this issue despite significant attention during Examination. The Secretary of State requests **BAE** to provide supporting information to enable the Applicants to undertake a Bird Strike Risk Assessment to BAE's satisfaction, given that such an assessment is central to resolving BAE / DIO's concerns on bird strike risks to the safe operation of Warton Aerodrome. The **Applicants** and **BAE** are requested to provide updates on data sharing and progress on the bird strike risk assessment and, include a timeline for completion if this cannot be achieved by the response deadline.
11. If the data has not been, or will not be, made available to the Applicants by BAE in a timely manner, it will be necessary for the Secretary of State to proceed to make a decision in the absence of that information. In this regard and with reference to [PID-002], if the additional data from BAE will not be available to the Applicants in a timely manner, the **Applicants** are requested to proceed with updating their bird strike risk assessment and provide this to the Secretary of State and BAE/DIO along with their other responses to this information request, without that additional data. This assessment should include further detail on how the mitigation areas are expected to affect bird population sizes, distributions and movements within the 13km wildlife zone surrounding Warton Aerodrome.

Habitats Regulations Assessment (HRA)

12. **Natural England** is invited to comment on any D6 or D7 submissions from the Applicants relating to HRA conclusions and confirm whether these resolve any of its outstanding concerns.
13. **Natural England** is invited to comment on the oWHMP and draft Wildlife Attractants Habitat Risk Assessment [REP7-034] and specifically on whether the proposed measures to reduce bird strike risk will negatively impact the proposed mitigation areas for the Ribble and Alt Estuary SPA.

14. The **Applicants** and **Natural England** are invited to provide any other updates relevant to HRA matters.

Marine Physical Processes, Subtidal and Intertidal Ecology

15. The **Applicants** are requested to update Table 3 of the Cable Specification and Installation Plan [REP6-097] (and any other relevant documents) to include the Maximum Design Scenario ("MDS") for sandwave clearance by area (m²) and to provide an explanation of how the MDS for sandwave clearance by volume (m³) has been calculated.

16. **Natural England** is requested to comment on the Applicants' D6 updates to the Offshore In Principle Monitoring Plan [REP6-104] and advise whether these resolve its concern relating to sandwave recovery set out in NE.PP.5 [REP6-179].

17. The Secretary of State notes that the Applicants have committed to monitoring of sandwave recovery from cable preparation and installation activities, through comparison of pre- and post-construction geophysical data [REP6-101]. He also notes that for Outer Dowsing Offshore Wind Farm inherent uncertainties in relation to sandwave recovery, from the same impacts, were resolved with a commitment to longer-term monitoring of sandbanks if full recovery is not observed³. The **Applicants** are therefore requested to consider updating [REP6-101] to secure further surveys of sandwave recovery if the initial post-construction survey does not indicate full recovery.

18. The **Applicants** are requested to explain how the 3% MDS for cable protection within the Fylde MCZ (as set out in CoT47 [REP6-042] and the outline Offshore Cable Specification and Installation Plan [REP6-097]) was calculated.

19. At the close of the Examination, Natural England advised that the Applicants should undertake project specific modelling in relation to indirect impacts to designated sites resulting from cable protection in the nearshore areas (RI_B3 in [REP6-193]; NE.PP.3 in [REP6-179]). The Applicants [REP7-042] considered this unnecessary due to nearshore ground conditions which allow for cable burial and because CoT45 [REP6-042] prevents cable protection from reducing water depth by more than 5%. The Secretary of State notes, however, that CoT45 allows for cable protection to exceed 5% water depth, subject to written approval from the relevant authority. The **Applicants** are requested to explain how the potential impacts to physical processes and designated sites from nearshore cable protection have been assessed, for the scenario where nearshore cable protection exceeding 5% water depth is required and approval is granted from the relevant authority.

20. Without prejudice to the Secretary of State's conclusions on impact to the Fylde MCZ, and in line with the Applicants' offer in [PID-002], the **Applicants** are requested to propose updated wording for their without prejudice benthic compensation DCO schedule [REP5-108]. The **Applicants** should consider if they

³ <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010130-002644-HRA-report-from-SoS.pdf>

wish to specify the impact based on the MDS or include a mechanism for this to be agreed post-consent and prior to the commencement of relevant works.

21. Without prejudice to the Secretary of State's conclusions in relation to the Fylde MCZ, the **Applicants** are requested to confirm whether they have engaged with Defra regarding the use of the MPA designation and/or extension measure of the Marine Recovery Fund and whether there would be sufficient capacity within the measure to provide measures of equivalent environmental benefit (MEEB) for the loss of up to 3.04 ha of subtidal mud and up to 2.64 ha of subtidal sand.
22. **Natural England** is requested to comment on any further D6 & D7 submissions relevant to the Marine Conservation Zone Assessment and confirm whether these resolve any of its outstanding concerns.
23. The Secretary of States notes the outstanding disagreement between the Applicants and Natural England regarding mitigation measures for impacts to marine physical processes (NE.PP.4 in [REP6-179]). **Natural England** is invited to explain its outstanding concerns and recommend how these could be addressed.

Landscape and Visual

24. Concerns were raised during the Examination [REP7-028, REP7-027, REP1-085] regarding the adequacy of the proposed mitigation measures for the onshore substations, particularly in relation to the effectiveness of the visual screening. The **Applicants** are requested to propose options to further mitigate the landscape and visual impacts of the proposed substations and explain the potential effectiveness alongside any potential adverse impacts of these proposed options.

Construction Hours

25. During the Examination, the Applicants proposed that core construction hours should be between 7:00-19:00 on weekdays and 7:00-13:00 on Saturdays, with an hour either side on weekdays for mobilisation activities. On a without prejudice basis, **the Applicants** are requested to provide updated documents with references to mobilisation activities removed, including the documents comprised within the Code of Construction Practice [REP6-067], which includes the outline Code of Construction Practice itself and the outline Construction Noise and Vibration Management Plan [REP6-083].

Flooding

26. The protective provisions for Lancashire County Council, the lead local flood authority, were not agreed by the end of the Examination [REP6-188]. The Applicants have confirmed in [PID-002] that the parties are close to reaching agreement. **Lancashire County Council** and the **Applicants** are requested to provide updates regarding the protective provisions and proposed amendment to Article 7 of the draft Development Consent Order (dDCO), and whether Lancashire County Council withdraws its objection.

Biodiversity Net Gain

27. Requirement 26 of the dDCO provides the mechanism for securing the delivery of 10% BNG. The **Applicants** are invited to comment on proposed amended wording for Requirement 26 (1) of Schedules 2A and 2B as set out below:

26. (1) The Project [A/B] onshore works must not be commenced until a biodiversity benefit scheme (in accordance with the outline biodiversity benefit management plan) has been approved in writing by the relevant planning authority in consultation with the statutory nature conservation body.

Other Onshore Ecology

28. Concerns were raised by Natural England throughout the Examination [RR-1601, REP6-179, REP6-190, REP5-184] regarding the need for further targeted peat surveys and the absence of provision for compensation. The **Applicants** are requested to update the outline Soil Management Plan [REP6-091] to confirm that no works will be undertaken within the non-surveyed areas until further targeted pre-construction surveys have been completed, and the findings of those surveys have been used to determine whether mitigation and/or compensation measures are required. The **Applicants** are requested to make provision for a compensation mechanism (based on a reasonable worst-case scenario [REP5-184]), should surveys identify a significant risk to the restorability of the deep peat that cannot be avoided or mitigated through other measures.

29. The Secretary of State notes Natural England's concern regarding indirect significant impacts on the Lytham St Annes Dunes SSSI from cable installation and advice in its closing statement [REP7-050] that it has not reviewed the Applicants' updated outline Landfall Construction Method Statement [REP6-151]. **Natural England** is invited to comment on the updates and advise whether these resolve their concerns.

Farm Business Assessment and Land Powers

30. John Fare occupies and runs a farming business from landholding 26, which includes the proposed site for the Morecambe substation and works connected with laying of cables. The Applicants seek compulsory acquisition powers in relation to this landholding. The Secretary of State notes that the Applicants' Farm Business Assessment(s) [REP6-182] and comments from Mr Fare's agent [REP6-222] were submitted at Deadline 6, and further submissions from the Applicants on this issue were contained in their Response to Rule 17 Letter [REP7-044] which was submitted at Deadline 7, at the close of the Examination. Given that these documents were submitted at a late stage in the Examination, the **Applicants** and **Mr Fare** are both requested to provide any further comments relating to the issues addressed therein. The **Applicants** and **Mr Fare** are requested to include an update as to whether any agreements have been reached between the parties through negotiations.

Land Use and Recreation

31. Queries were raised during the Examination regarding damage caused by vehicles undertaking pre-construction surveys along bridleway 5-5-BW-16. Noting the provisions of 2024 NPS EN-1 5.11.30-31, the **Applicants** are requested to clarify whether the dDCO or supporting documents provide a process ensuring that adverse impacts to public rights of way, including impacts arising during pre-construction works, both within and outside the Order limits, are remedied in a timely manner. If there is not such a process, the **Applicants** are requested to provide some proposed drafting to address this.

Historic Environment

32. The Secretary of State notes that the Examination considered the potential for adverse effects upon Hesketh Farmhouse, and he notes the potential for cumulative effects on this asset resulting from the Proposed Development alongside other planned works to the Penwortham substation outside of the current application. The **Applicants** are requested to confirm whether any information is available relating to the environmental impacts of the proposed works to the substation and whether they can undertake an assessment of the cumulative effects on Hesketh Farmhouse in light of the information available at this time.

Funding for the Morgan Offshore Wind Project

33. The Applicants' letter of 30 January 2026 [PID-001] noted that Morgan Offshore Windfarm's parent companies have decided not to proceed with the Agreement for Lease for the Morgan Offshore Wind Project. The Applicants stated that The Crown Estate is considering next steps, with the aim to ensure the continued development of the site by another developer, and that The Crown Estate views the Morgan Offshore Wind Project as a continuing and live project.

34. **Morgan Offshore Wind Farm Ltd** is requested to provide detailed information regarding its viability, and the necessary funding to underpin both the compulsory acquisition (CA) powers sought and any potential claims for blight, and to explain whether the dDCO provides a clear mechanism to guarantee the necessary funding or whether further wording is required. **Morgan Offshore Wind Farm Ltd** is requested to provide updates to any relevant documents, including tracked change versions, such as the Funding Statement.

35. **The Crown Estate** is requested to provide further information regarding if and when another developer can be found for the Morgan Offshore Wind Project. **The Crown Estate** is requested to provide further information regarding any funding or guarantee mechanisms which could be made available to ensure that financial liabilities (such as CA powers or claims for blight) that may arise if the Secretary of State grants consent for the Morgan Transmission assets can be met.

Funding for the Morecambe Offshore Wind Project

36. During the Examination, concerns were raised regarding whether Morecambe Offshore Windfarm Limited has adequate funding to meet any blight claim [EV5-

003], [EV5-006], [PD-011], [EV11-006] due to significant impacts to farm businesses [APP-104]. The only assets being offered by the Applicant are an intercompany loan repayable on demand, which any affected individual may be unable to rely upon prior to the commencement of construction. The Applicant referred in the Examination to article 33(2) in the dDCO in this regard, but the Secretary of State notes that this does not provide a mechanism for compensation to an affected party for a blight claim if the DCO is granted, but powers of CA and temporary possession have not been exercised. The information in section 1.2 of the Statement of Reasons [REP6-018] relates solely to Morgan Offshore Wind Farm with the only reference to Morecambe Offshore Wind Farm being in paragraph 1.1.1.3. **Morecambe Offshore Windfarm Limited** is requested to provide further information to demonstrate that adequate funding will be available both for CA and acquisition resulting from blight. The Statement of Reasons is required to be amended and any other relevant documents.

Land Powers

37. The **Canal and River Trust** and the **Applicants** are requested to provide updates regarding whether protective provisions have been agreed, and whether the Canal and River Trust have any outstanding objections [REP7-056].
38. **Blackpool Borough Council** and the **Applicants** are requested to provide an update on negotiations relating to temporary possession powers in respect of the access to St Annes Beach via Starr Gate [REP4-130], [REP5-164], [REP7-045], including whether agreement has been reached in this regard.
39. The **Applicants** and **Agents SHP Valuers acting for Greenbank Farm** are requested to provide an update, including whether agreement has been reached in relation to rights of access sought by the Applicants at Greenbank Farm [REP6-216, REP7-042].
40. The **Applicants** and the **Affected Parties at Eastham Hall Farm** are requested to provide an update on their position in respect of the rights sought over this land, including whether an agreement regarding an alternative solution has now been reached [REP5-196].
41. The **Applicants** and **Blackpool Borough Council** are requested to provide an update on the progress of ongoing negotiations in relation to rights sought by the Applicants over the Blackpool Airport site and whether an agreement has been reached between the parties.
42. The **Applicants** are requested to provide any further updates regarding any other land right agreements.

Land Powers for Biodiversity Benefit Land at Lea Marsh

43. The potential exercise of CA powers for the biodiversity benefit land at Lea Marsh was discussed during the Examination [REP7-055]. The **Applicants** are requested to clarify for which plots of land at Lea Marsh compulsory purchase powers are sought solely for providing biodiversity net gain. The Applicants are asked to clarify

any consequent changes which would be required to be made to the dDCO and any other documents should the biodiversity benefit land at Lea Marsh be excluded from the CA powers in the order.

Section 106

44. The **Applicants** and **Fylde Borough Council** are requested to provide further information regarding whether Section 106 agreements relating to Blackpool Road Recreation Ground have been completed. In its 27 January 2026 letter, the Council stated that it has asked the Applicants to enter into a deed of indemnity in favour of both the Council, as leaseholder, and Lytham Town Trust Ltd, as freeholder, enabling the Council to enforce the agreement against the Applicants and their successors in title. The Council has also requested that wording is added to Article 6 of the dDCO providing that the benefit of the order cannot be transferred unless (i) a deed of covenant has been entered into between the lessee or transferee of the benefit and the Council, regarding the performance of obligations under the Section 106 agreement, and (ii) a deed of indemnity has been provided to indemnify the Council in respect of the Section 106 agreement. The **Applicants** are requested to comment on any progress made towards agreeing the wording of the Section 106 agreement, the Council's request for an indemnity and the Council's proposed amendment to Article 6 of the draft Development Consent Order.

Crown Land

45. The **Duchy of Lancaster, His Majesty's Coastguard, the Secretary of State for Transport** and the **Applicants** are requested to confirm whether any outstanding matters have been resolved in respect of compliance with Section 135 of the Planning Act 2008 [REP7-040]. If consent is not obtained, Crown land plots will need to be removed from the scope of the CA provisions.

46. During the Examination the Applicants were unable to clarify whether plots 16-107B, 16-108B, 16-109A, 16-110A, 16-111B, 16-112B, 16-113A, 16-114, 16-115, 16-116A, are owned by the Duchy of Lancaster or by Hesketh Farms Limited. The **Applicants** and the **Duchy of Lancaster** are requested to clarify ownership of the landholdings.

Public Sector Equality Duty

47. The Applicants' Public Sector Equality Duty impact assessment was updated at D6 [REP6-133] to reflect discussions with the Wrea Green Equitation Centre and include updates to the outline Communications Plan [REP6-069] and outline Construction Noise and Vibration Management Plan [REP6-083]. Due to the late submission of the final mitigation proposals, Wrea Green Equitation Centre did not have the opportunity to comment. **Wrea Green Equitation Centre** is requested to provide comments on the updated impact assessment.

DEADLINE FOR RESPONSE

48. **The deadline for response is 23:59 on 13 April 2026. Responses should be submitted by email only to:**

morganandmorecambeowfta@planninginspectorate.gov.uk.

49. Responses will be published on the Morgan and Morecambe Offshore Wind Farms Transmission Assets project page of the National Infrastructure Planning website as soon as possible after **13 April 2026:**

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032>

50. This letter is without prejudice to the Secretary of State's consideration of whether to grant or withhold development consent for the Proposed Development or any part of the project. Nothing in this letter is to be taken to imply what the eventual decision might be or what final conclusions the Secretary of State may reach on any particular issue which is relevant to the determination of the application.

Yours faithfully,



John Wheadon

Head of Energy Infrastructure Planning Delivery & Innovation

Department of Energy Security & Net Zero