

Interested Party Reference number: [REDACTED]

Planning Examination inspection for the application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an order granting development consent for the development for the Morgan and Morecambe Offshore Wind Farm Transmission Asset (M&M OWL TA)

The Secretary of State (SoS) for the Department of Energy Security and Net Zero (DESNZ) has issued three project updates during 2026. The first addressed issues relating to the applicants claims of a three scenario solution options; two wind farms and a common transmission system, one wind farm (either Morgan or Morecambe) and a single transmission system. Although the applicants propose such options there is no apparent financial or costing model variation defined within the document set for such eventualities.

The second update requested for further information from applicant stakeholders across a range of subjects to be submitted by the 13th of April.

The third update informed all stakeholders that the statutory deadline date of the 29th April had been pushed back to 14th May due to local elections on 7th May, 2026.

I have made three submissions to this Planning Examination to date raising many issues and risks, this being the fourth, but there has been no response nor any indication of developments other than awaiting the final decision now scheduled for 14th May.

My first submission proposed an alternative route running the power cable corridor along the Ribble estuary but alternative routes for this Examination were deemed out of scope!

My second submission identified key issues; firstly, the lack of document maturity, lack of governance and the lack of a consolidated risk definition and associated risk contingency. Secondly, I also identified many project deficiencies i.e. no case for change, no business case, no investment case or net present value (NPV) et al. Since the final submission, 29th October, it has become clear certain processes e.g. the Treasury's Green book has been ignored by the applicants as there is no evidence, nor reference having been made to this process.

The alignment of HM Treasury's Green Book (appraisal and business case process) and the Planning Inspectorate process (specifically for Nationally Significant Infrastructure Projects, or NSIPs) requires a parallel, integrated approach where the business case's strategic rationale is solidified before and during the planning submission to ensure viability. The Green Book ensures public value (economic, environmental, social) while the Inspectorate assesses planning merits.

I propose if the Green Book had been utilised by the Applicants many of the issues I raised would have been addressed.

My third submission raised concerns with respect to the financial provenance of Morecambe OWL, especially as it held very low levels of equity (circa £1,000), to prosecute their part of the transmission assets project. On reviewing Morecambe OWL provenance on HM Gov's Companies House website, the Company's postings looked immature at best. In fact, today's inquiry suggests the Company is in the process of being struck off! Over to Copenhagen Infrastructure Partners (CIP) I assume but there are concerns by Spanish authorities questioning CIP's business practices [used in wind farm projects](#).

Bird Strike Threat - Page 2 and 3 items 4-14.

In the second update, bird strike was raised for further clarification between the Applicants and BAe Systems.

Freckleton Marsh, part of the Ribble Estuary in Lancashire, is a vital historical site for migratory and breeding water birds, with extensive reclamation since 1806, including major embankments in 1837. Historically, it supported breeding waders like Lapwing and Redshank, and served as a significant site for migratory Knots, Dunlin, and Pink-footed Geese.

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Over many years BAe System have done a brilliant job protecting these bird communities, preventing damage to their aircraft and local communities from bird strike. With the potential of up to 11 years of noise/vibration from construction, it is impossible for BAe Systems to endorse a risk-free environment, as aircraft activity will continue and birds to thrive there. Especially, as the UK government has recently reached an agreement with Turkey to provide a three-year training and support contract alongside its recently ordered Eurofighter Typhoon aircraft with the final assembly of the 20 Turkish jets set to take place at the BAE systems site in Warton, Lancashire. It also needs to be noted that by the mid 2030s Tempest (GCAP), the 6th generation aircraft currently in design with BAe Systems and partners, will be in the prototype and flight test phase so bird strike will continue to be a significant risk.

I have every confidence BAe Systems will continue their professional approach to bird strike mitigation due to their known flight operations and test flight programmes. BAe Systems cannot be held responsible to mitigate unknown, unknowns created by other entities but the Applicants and their construction partners must be fully accountable for any further incidence or disturbance instigating bird strike threats.

Freckleton, has already experienced the worst ever military disasters in the country's history (killing 61 people including 38 children & 2 teachers) the local community cannot be allowed to be put in this situation again!

Equestrian Centre - Page 9 item 47

The Wrea Green Equitation Centre in Fylde, Lancashire, is facing potential closure after over 40 years in operation due to this proposed onshore cable corridor for new offshore wind farms. The project involves installing underground cables through the area, with construction activity planned near the centre on Bryning Lane.

Impact on the Equitation Centre:

- **Safety and Welfare Concerns:** states that the planned work, which includes test drilling, noise, and vibration on land bordering the school, would make it impossible to continue operating. The owner noted that horses are flight animals that cannot handle the disruption, making the site unsafe for riding lessons.
- **Operational Disruption:** The centre, which accommodates roughly 300 riders a week, including many with disabilities, fears the noise and vibration—expected 24/7 for an extended period—would "bankrupt" the business.

Broader Context:

- **Community Opposition:** The project has led to significant opposition from residents and local leaders, who describe the proposed route as cutting the Fylde in two, threatening rural livelihoods, and impacting greenbelt land.
- **Alternative Routes:** local people have suggested using alternatives like the River Ribble or River Wyre to avoid built-up areas, farmland, and businesses like the Wrea Green Equitation Centre

Radar Performance Interference by Wind Turbines.

There is a significant risk that Radar performance is adversely affected by interference from wind turbines. This affects radar performance by creating false targets, signal blockage (shadowing) and clutter, which can severely degrade surveillance, aviation, and weather radar systems. The large, rotating blades reflect radio waves, producing spurious signals often mistaken for aircraft, while the physical structures create radar shadows, leading to potential gaps in coverage.

With recent events resulting from the Gazan and Iran wars and associated threats, it has already been muted that the UK needs an Iron Dome Battle Management Centre similar to the one installed by Israel. Such installations will exploit C4I/C4SRI type technologies that do not need their capabilities degraded by wind turbine interference. Such capability will be required to detect and to protect against from both traditional and

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asymmetrical threats whilst being linked to an array of surface to air missiles to provide a deterrent and ultimately defence of the United Kingdom. This a significant National Security risk that needs careful consideration by the MoD and our Military Forces.

To Concluded; Challenges and Threats to the United Kingdom.

Many issues have been raised with no feedback. The M & M TA Examination was initiated to generation an output of 1,980 MW. That has now been reduced to 480 MW due to the Morgan OWL being unsuccessful in securing Allocation Round funding. This resulted in one of their major backers pulling out and other financial partners deciding not to progress Morgan OWL further. To all intents and purposes Morgan OWL and its associated transmission assets has been abandoned but no formal change of this change has been acknowledged, registered nor presented to stakeholders like myself by the Planning Inspectorate.

There is an apparent lack of alignment between Governments Departments involved in this project i.e. the Treasury, the DESNZ, the Dept Housing, Communities & Local Government (Planning Inspectorate) and the risk to the MoD/Military Forces. Failure in such large organisational constructs is typically initiated at the interfaces usually due to ineffective communications and/or inferior process interfaces. Tell me this is not so in this case?

I look forward to the Green Book proposal being prepared by Lancashire County Council in conjunction with Fylde Borough and Wyre Councils being fully considered while this project's determination is being made.

UK growth is flat lining. Inflation is 3 %, 50% high than the Bank of England's 2% target. These metrics will only worsen due to the conflicts in the Middle East. High energy costs are adversely impacting UK's industry and consumers is very concerning. UK industrial energy costs are 4 x those of the USA and 8 x those of Texas. The UK is losing wealth generating businesses e.g. Refining, Chemicals, Steel making and Fertiliser production capabilities due to these exorbitant costs, which is bad enough, but the UK losing independent, self-reliant capabilities crucial to satisfy current and future demands. The UK has been subsidising renewables for 40 years and such costs/subsidies are now locked in for a further 20 years due recent Contract for Difference (CfD) agreements. Such high energy costs are now disadvantaging the UK's economy and devastating the industrial landscape, even inward investor potentials are questioning whether the UK is a viable location for investment. The latest casualty being OpenAI who has dramatically pulled its planned £31 billion investment in Britain. The tech giant has scrapped plans for a huge AI data centre because of Britain's crippling high energy costs and the Government's Net Zero policies. The project would have created thousands of well-paid jobs and helped turn the UK into a global AI superpower. As of February 2026, approximately 140 new data centre projects have applied for connections to the UK's electricity grid (Ref Workplace Insight). But how many of these connections will the grid be able to effectively satisfy? This a creating a **Capacity Crunch**: The proposed data centre capacity demands a further 50GW than current supply, which is truly significant, and in many cases projects face waiting times of over ten years for grid connections.

The retirement of the Gas and Nuclear generation fleets are scheduled in the next 2/3 years with no planned replacement. Significant carbon taxes are being added to gas prices making them far more expensive than actual market costs. Also, European Union carbon taxes are anticipated to be added as well, artificially increasing such costs still further. In so doing it makes gas turbine fleet replacement virtually unjustifiable due to an inflated gas price of £145 plus /MWh versus £92/MWh for a fixed offshore turbine.

Three companies make 75% of the world's large gas turbines: GE Vernova, Siemens Energy, and Mitsubishi Power. All three have backlogs stretching to 2029 or 2030, and wait times have gone from two or three years to five or seven. Bloomberg estimates more than \$400 billion in planned gas plants could be delayed or cancelled because there aren't enough turbines being made.

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Similarly, many nuclear assets are due for retirement in the next few years. Heysham 1 & Hartlepool power stations have already had their service lives extended but Hunterston B and Hinkley Point B are in the defueling phase. Replacement capabilities, Hinkley Point C and Sizewell C, are due to enter operational service 2030 and 2035 respectively. However, Hinkley Point C's poor build/cost performance questions the revised operational implementation targets. There is a high probability of scheduled completion being pushed even further to the right and with further cost escalation. Note. Hinkley Point C original estimated cost was £18 Billion but the latest forecast for 2030/31 completion is £49 Billion.

As can be seen from a few points made above the UK's Energy Security is far from secure. Most (77%-80%) of renewable energy is funded by inward investment. Therefore, the lucrative profits made from green subsidies will, after EITB and tax concessions have been taken into account, be returned to foreign countries/companies extracting more wealth from the UK economy. The trajectory of the net zero strategy does not give the UK the competitive advantage the UK deserves as is becoming yet another National security at risk. This time an economic one!

Final thoughts on the [Premeditated Industrial Destruction?](#) of the United Kingdom and its reversal.

[REDACTED]

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Addendum - Reference [REDACTED]

This is something everyone interested in energy should read - supplier CEOs giving evidence to the DESNZ Select Committee last autumn Selected highlights...

[REDACTED] Director of Regulation and Economics at Octopus Energy:

"...if we continue on the path that we are on right now, in all likelihood electricity prices for a typical customer are going to be 20% higher in four or five years' time than they are now. That is even if wholesale prices halve... The point is that the country as a whole at the moment is paying over £20 billion a year on its electricity bills for policy costs. The projections are that that is going to increase. That is one of the hundred pounds that will possibly be added to electricity bills on the current trajectory over the next four years. It is time that we got this burden under control,"

Simone Rossi, CEO at EDF UK: "We can compare the cost to serve in France and the cost to serve in the UK. Per point of delivery, the cost to serve in the UK is about £100 per annum. In France, it is €45, which is half, more or less. It is actually less than half. This is not to do with the wholesale price or the gas marginal cost et cetera. It is driven by the fact that we have very complex regulation that has become stratified over the years.... ..we have in front of us a system where, even if the wholesale price were to halve, as she indicated, the bills will rise. There are two main drivers that we have in front of us in the growth of the bills. One is the demand reduction. We are building infrastructure as if there was more demand, but, in reality, there is less and less demand, so you have a bigger burden on smaller shoulders..."

Chris Norbury, CEO at E.On UK:

"if I look at the non-commodity costs—policy costs and network costs—certainly some of the modelling that we have suggests that you could get to a position by 2030 where, if the wholesale price was zero, bills would still be the same as they are today because of the increase in those non-commodity costs,"

Chris O'Shea, CEO at Centrica:

"When you look at what consumers pay, consumers do not actually pay the wholesale gas price for anything backed by a CfD. When people talk about getting the wholesale gas price down, that is quite a red herring. "Consumers pay what the CfD price is. If the wholesale electricity price goes to a pound, the CfD will simply make that back up to the £75 per megawatt-hour or so that wind farms are getting at the moment,"