
To:
All Interested Parties
BAE Systems
Blackpool Borough Council
Eastham Hall Farm
Environment Agency
Morgan Offshore Wind Limited and Morecambe
Offshore Windfarm Limited
Natural England
The Crown Estate

Our Ref: EN020032

20 May 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(1) of the Planning Act 2008, the Secretary of State has three months to determine the application, unless a new deadline is set using the power under section 107(3) of the Planning Act 2008.
2. On 12 March 2026 the Secretary of State requested information from various parties (“the first information request”) [C1-001].
3. On 26 March 2026 the Secretary of State extended the statutory deadline to 14 May 2026.
4. On 14 May 2026 the Secretary of State extended the statutory deadline to 14 September 2026.

5. There are issues on which the Secretary of State requests that the parties identified below provide updates or information as appropriate (“the second information request”).

All Interested Parties are invited to comment

6. Responses were received from various parties to the questions raised in the first information request [C1-001], and these responses were published online on 17 April 2026. **All Interested Parties** are invited to comment upon these documents.
7. On 29 January 2026 the Examining Authority submitted to the Secretary of State various post-examination submissions dated from 29 October 2025 to 29 January 2026 [PIR-001 to PIR-009, DR-001 to DR-002]. The Secretary of State published these online on 27 April 2026. **All Interested Parties** are invited to comment upon these documents.

Response to All Interested Parties comments

8. The **Applicants** are requested to provide comments regarding the points made by All Interested Parties in response to the first information request.

Onshore Ornithology and Bird Strike Risk to Aviation at Warton Aerodrome

9. Natural England’s advice on temporary mitigation measures in [C1-016] (response to question 6) was subject to it reviewing the Applicants’ updated Outline Ecological Management Plan (“OEMP”) (Document Reference: J6/F07). **Natural England** is requested to review the OEMP and confirm its advice.
10. Without prejudice to the Secretary of State’s conclusions on the matter, the **Applicants** are requested to provide further information to support their argument that land at the proposed substation sites is not functionally linked to the Ribble and Alt Estuary Special Protection Area (“SPA”) for golden plover. This should include information on the dates and timings of the baseline surveys undertaken at the site and corresponding tidal states at the time of the surveys. The Applicants should confirm if these surveys are representative of a range of tidal conditions and variation in diurnal behavioural cycles of golden plover and provide sufficient evidence to support their position.
11. Noting that Table 1.12 and 1.13 in [APP-093] present total monthly counts across the baseline survey area, the **Applicants** are requested to provide further detail on the specific locations and associated counts where golden plover were recorded during these surveys.
12. The **Applicants** are requested to explain why [APP-092] presents golden plover survey data in terms of the mean distribution between 2022-2024 using mean density/km² (Figure 1.37) as opposed to presenting the distribution based on monthly peak survey counts by individual year such as for woodcock and snipe

(Figures 1.44-47). The Applicants are asked to provide updated figures for golden plover density displaying monthly peak counts by year.

13. Without prejudice to the conclusions of the Secretary of State's Habitats Regulations Assessment, the **Applicants** are requested to provide any further information to support their position that habitat loss at the proposed substation sites would not result in an adverse effect on the integrity of the SPA, even if a functional linkage to the SPA cannot be ruled out. The further information should as a minimum:
- a. quantify land use at the substation sites and how much of specific habitat types, e.g. pasture/arable land etc, will be lost;
 - b. quantify land use in the wider area around the substation site and provide detail on what specific habitats will remain available to impacted features such as golden plover;
 - c. provide information on how these sites are known to be used by golden plover and the potential for these habitats to support birds displaced by the substation site.

The Applicants are encouraged to work with Natural England to identify any other information relevant to this assessment.

14. The **Applicants** are requested to explain if works at the substation sites such as balancing ponds and landscaping works provide opportunities for habitat enhancement works that could benefit golden plover.
15. Noting disagreement between Natural England [C1-016] and the Applicants [C1-029] on the additionality of the proposed alternative mitigation site at Crossens Outer and Banks Marsh, the Secretary of State invites **Natural England** to submit further information, such as the management plan for the National Nature Reserve, and any evidence that funding is secured to undertake such works in the absence of the Proposed Development, to support its position.
16. The **Applicants** and **Natural England** are also requested to provide further information on the proposed delivery of the alternative mitigation site at Crossens Outer and Banks Marsh. This should clarify land ownership and responsibilities for securing and implementing long-term management, monitoring and adaptive management for the lifetime of the Proposed Development.
17. The Secretary of State notes that Natural England considers the proposed measures at Crossens Outer and Banks Marsh will "*likely enhance the environment within the NNR and contribute to positive management of the site. Implementing the measures to support management of the site could lead to positive environmental benefit*" (Annex 1 of [C1-016]). Without prejudice to the Secretary of State's conclusion on the matter, the **Applicants** and **Natural England** are requested to comment on the suitability of the proposed measures, to provide compensation for impacts to golden plover, should an AEoI on the Ribble

and Alt Estuary SPA not be ruled out due to habitat loss at the proposed substation site.

18. If the **Applicants** consider this a suitable compensation measure, they are requested to submit any additional information that would be necessary to support a derogation case, on a without prejudice basis.
19. The Secretary of State notes Natural England's response to question 13 in [C1-016] and question 2 in [REP6-190] in relation to the proposed Active Management Measures (AMM), and the Applicants' response to point 9 of the first information request in [C1-029] which states that it would not be appropriate to set trigger levels/thresholds at this stage. To ensure implementation of AMM does not downgrade the quality or effectiveness of the proposed mitigation sites, the **Applicants** are requested to propose wording for an additional mechanism in the Outline Wildlife Hazard Management Plan ("oWHMP") to require that:
 - a. If AMM are needed, the Applicants will provide Natural England with an assessment of how the AMM will impact any ornithology features of a special protection area utilising the mitigation areas and the associated impact on the quality and effectiveness of those mitigation areas;
 - b. If it is determined that the AMM have the potential to downgrade the quality and effectiveness of the mitigation areas, the Applicants must propose alternative AMM that respects the requirements of the mitigation areas whilst still delivering the required level of hazard management or provide alternative mitigation solutions specific to the affected species/features.
20. **BAE Systems** ("**BAE**") is requested to update its bird strike risk assessment provided within [C1-023] to include further explanation of the approach and methodology used in the assessment of risk and commentary on the findings of this risk levels. This should include:
 - a. the approach to allocating the "*Re assessed risk level*" risk scores to account for the proposed development;
 - b. an explanation of why risk levels for species groups such as waders and geese is considered to increase between the "*Re assessed risk level*" and the "*Risk level with management*";
 - c. how proposed control measures in the outline Wildlife Hazard Management Plan [REP7-034] have been considered within the allocation of the "*Risk level with management*" score;
 - d. discussion and conclusions on the assessed risk levels and their implications for aviation safety.
21. The Secretary of State notes that throughout BAE's bird strike risk assessment, [C1-023] in relation to monitoring, the risk assessment refers to data sharing and reporting agreements with Blackpool Airport but states "*no suggestions made for BAE Warton*". **BAE** is requested to provide a list of the information/reporting it

would expect from the Applicants to enable safe management of bird strike risk. The **Applicants** are invited to propose data sharing and reporting arrangements with BAE to support the management of this information and related bird strike risk.

22. **BAE** is invited to explain why it has not been able to provide the complete data sets expected by the Applicants to inform the assessment of bird strike risk.

Marine Physical Processes, Subtidal and Intertidal Ecology

23. The **Applicants** are requested to commit to pre- and post- construction surveys of geomorphological receptors at the intertidal work area. This is to establish a baseline prior to construction works and then evidence that the area has been fully reinstated (in line with commitment 27) and has fully recovered from temporary impacts.
24. The Secretary of State notes the Applicants do not anticipate needing to install cable protection between the Lowest Astronomical Tide (“LAT”) and Depth of Closure (“DoC”) however, he also notes that, provided the Applicants receive written permission from the MMO in consultation with the MCA and Trinity House, the draft DCO does not prevent this. The **Applicants** are therefore requested to update CoT45 or provide a new commitment to explicitly require consultation with Natural England if it is necessary to deploy any cable protection between LAT and DOC; and to require the Applicants to provide the necessary information and modelling to inform an assessment of impact on sediment transport processes from the proposed cable protection.
25. The **Applicants** are requested to update the commitments to adaptive management/remedial action in the Offshore In Principle Monitoring Plan to include consideration of impacts identified within the Marine Conservation Zone (“MCZ”) assessment alongside the Environmental Impact Assessment.
26. Noting Natural England’s request in [REP5-179] the **Applicants** are requested to commit to the use of a precise method of sediment disposal within the Fylde MCZ to ensure sediment is deposited over areas of the same seabed type and to mitigate potential impacts to other habitat features. If this is not possible, the Applicants are requested to explain why.
27. To further reduce impacts within the Fylde MCZ the **Applicants** are requested to update the Outline Offshore Cable Specification and Installation Plan to restrict the use of a boulder plough within the MCZ (i.e. to only allow use of a boulder grab) and to require that any relocated boulders will not be deposited to form linear structures. If this is not possible, noting the Applicants position at 3.3.1.2 in [REP7-042], the **Applicants** are requested to explain why a boulder grab would not be appropriate for a high density of boulders.

28. Noting Natural England's advice in [C1-016] regarding Unexploded Ordnance ("UXO") clearance, the **Applicants** are invited to explain whether it is feasible to relocate UXO from within to outside the Fylde MCZ prior to detonation. If it is so, the **Applicants** are requested to commit to this approach.
29. Following confirmation from the Marine Recovery Fund Operator that there is expected to be sufficient capacity in the Marine Protected Area ("MPA") designation and/or extensions measure to meet the without prejudice MEEB requirements (1.5.2.29 in [C1-029]) the **Applicants** are requested to explain why it is necessary to retain project-led measures in the without prejudice benthic compensation schedule.

Flooding

30. In the Parish Councils' response [C1-007] they note that the Environment Agency issued further flood data in its "Flood Zones plus Climate Change" series1 (issued 27 August 2025). The **Applicants** are requested to confirm if this has been considered and, if not, to provide any updates to the Flood Risk Assessment accordingly. The **Environment Agency** is also invited to confirm whether it considers this data should be incorporated into the Flood Risk Assessment.

Funding for the Morgan Offshore Wind Project Transmission Assets

31. If the current shareholders of Morgan Offshore Wind Limited do not continue to promote the Proposed Development this may have implications for whether compulsory acquisition (CA) powers can be granted. In response to the last request for information:
- a. The Applicants state that the intention of the shareholders of Morgan Offshore Wind Limited is to step away from the Morgan project as soon as possible following the Secretary of State's decision on 14 May 2026, and that if the decision is delayed beyond that date Morgan Offshore Wind Limited's shareholders would need to consider whether they will continue to promote the proposed development [C1-029].
 - b. Agents SHP Valuers acting for Greenbank Farm state that negotiations for the Morgan Offshore Wind Farm agreements are being paused, and option plans updated to remove land or references to Morgan Offshore Wind Farm [C1-004].
 - c. Blackpool Borough Council state Morgan Offshore Wind Farm Ltd have issued an exit notice from the co-operation agreement [C1-027].
32. To be able to grant CA powers, the Secretary of State must have certainty that any statutory blight claim could be met and that genuine efforts are being made to negotiate in relation to all land rights for which compulsory acquisition is sought. Noting that the statutory deadline for this decision has now been extended until 14 September 2026, the **Applicants** are asked to confirm:
- a. whether the current shareholders of Morgan Offshore Wind Limited will continue to promote the proposed development until there has been a sale or

transfer to an alternative developer, including continuing to negotiate all voluntary agreements; and

- b. whether the current shareholders of Morgan Offshore Wind Limited will meet any statutory blight claims that will arise from the grant of CA powers if development consent is granted, in the event that an alternative developer has not been found at the time that any such claims are made.

33. In response to questions on land rights [C1-029], the Applicants discuss Morgan Offshore Wind Farm Limited notice to exit and the agreement for Morecambe Offshore Windfarm Limited to meet Morgan Offshore Wind Farm Limited's obligations under the cooperation agreement with Blackpool Airport. The **Applicants** are requested to confirm if this is the case for any other land rights agreements.

34. The Crown Estate notes in its response [C1-017] that under the lease agreement, should Morgan Offshore Wind Farm Limited terminate the lease, The Crown Estate has the right to require that any relevant consents are transferred to The Crown Estate or an alternative company. To date, no alternative company is in place. **The Crown Estate** is requested to confirm whether there are any circumstances in which it would take responsibility for continuing land rights negotiations and providing financial security to meet claims arising from statutory blight, until an alternative developer is in place for the Morgan Offshore Wind Project Transmission Assets.

35. If the Secretary of State is not given the confidence he seeks in asking these questions and as a result CA powers are refused for the Morgan Offshore Wind Project Transmission Assets (referred to as "Project A" in the draft Development Consent Order), then any alternative developer taking on the Morgan project would need to obtain all necessary land rights by negotiation or apply for a Compulsory Purchase Order under different legislation (for example the Electricity Act 1989). The Applicants note that this would require further time (12-18 months) and incur additional costs [C1-029]. **The Applicants** and **The Crown Estate** are asked to confirm, with justification, that the Morgan Offshore Wind Project would remain viable in planning terms for an alternative company should development consent be granted for the transmission assets without any CA powers.

Land Powers

36. 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.

37. **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, including whether agreement has been reached in this regard.

38. 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. **Blackpool Borough Council** has requested Protective Provisions be included in the draft Development Consent Order [C1-027], the Applicant is requested to comment on these.
39. The **Applicants** are requested to provide any further updates regarding any land right agreements.

DEADLINE FOR RESPONSE

40. The deadline for response is **23:59 on 22 June 2026**.
41. Responses should be submitted **by email only** to:
morganandmorecambeowfta@planninginspectorate.gov.uk.
42. 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 22 June 2026**: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN020032>.
43. 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