



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Cover Letter for Response to Secretary of State Consultation 3
Request for Information – Part 2**

**Deadline: SoS Letter 3- Part 2
Application Reference: EN020028**

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07 August 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

The Applicants are pleased to respond to the second part of the Secretary of State's information request dated 08 July 2026 (C3-001).

This submission comprises the Applicants' Response to Interested Parties' (IPs) Submissions made during the Secretary of State Information Request 2. The Applicants note that a significant number of the matters raised by Interested Parties have already been addressed during the Examination or in subsequent post-Examination submissions. The Applicants have prepared a consolidated table as part of this submission (S_SoSQ_20) identifying where each matter has previously been considered, with cross-references to the relevant submissions.

This submission also provides clean and track-change Books of Reference relevant to the first part of the Secretary of State's information request dated 08 July 2026 (C3-001) and then addresses the limited number of new matters raised by IPs and provides a summary of the current position following the Secretary of State's three information requests.

We have also enclosed two separate Joint Statements for the attention of the Secretary of State: 1. between the Applicants, Blackpool Council, Blackpool Airport Properties Limited (BAPL) and Blackpool Airport Operations Limited (BAOL) (S_SoSQ_17). This Joint Statement confirms that all parties agree to the inclusion of the Protective Provisions and that any concerns relating to the continuous, safe and efficient operation of Blackpool Airport have been satisfactorily addressed through the inclusion of the Protective Provisions and Requirement 29 (C1-029.16) in the Order; and 2. between Morecambe Offshore Windfarm Ltd and Fylde Borough Council (S_SoSQ_66). This Joint Statement confirms that the parties have made positive progress in relation to the Section 106 agreement concerning Blackpool Road Recreational Ground.

CLEAN AND TRACK-CHANGE WITHOUT PREJUDICE BOOKS OF REFERENCES

In relation to the first part of the Secretary of State's information request dated 08 July 2026 (C3-001), the Applicants provide clean and tracked versions of the four Books of Reference as part of this submission, along with the Schedule of Changes to the Book of Reference. The references of the Books of References and Schedule of Changes are as follows:

- Without Prejudice Removal of Morgan Land Powers - Book of Reference (Tracked) (S_SoSQ_23)
- Without Prejudice Removal of Morgan Land Powers - Book of Reference (Clean) (S_SoSQ_23)
- Without Prejudice Removal of Lytham Moss and Morgan Land Powers - Book of Reference (Tracked) (S_SoSQ_32)
- Without Prejudice Removal of Lytham Moss and Morgan Land Powers - Book of Reference (Clean) (S_SoSQ_32)
- Without Prejudice Removal of Morgan Land Powers and Lea Marsh Plots - Book of Reference (Tracked) (S_SoSQ_59)
- Without Prejudice Removal of Morgan Land Powers and Lea Marsh Plots - Book of Reference (Clean) (S_SoSQ_59)
- Without Prejudice Removal of Morgan Land Powers, Lea Marsh Plots and Lytham Moss - Book of Reference (Tracked) (S_SoSQ_62)

- Without Prejudice Removal of Morgan Land Powers, Lea Marsh Plots and Lytham Moss - Book of Reference (Clean) (S_SoSQ_62)
- Without Prejudice - Schedule of Changes to the Book of Reference (S_SoSQ_63),

The Applicants note that, although tracked versions were not requested by the Secretary of State, the Applicants consider these may assist the Secretary of State by providing a clear and transparent record of the updates undertaken and the basis upon which the Books of Reference have been updated on a without prejudice basis. Clean versions of the Books of References, originally submitted as part of the Applicants' Part 1 submission, are also being resubmitted following the identification of a small number of additional corrections.

RESPONSE TO NEW MATTERS RAISED BY INTERESTED PARTIES

In reviewing the Interested Party responses, the Applicants have noted two matters raised which have not been expressly addressed previously by the Applicants: 1. an economic assessment submitted by Fylde Borough Council; and 2. grounds of a legal challenge raised by Newton-with-Clifton and Freckleton Parish Councils. We make the following comments on each:

Economic Assessment submitted by Fylde Borough Council

In Fylde Borough Council's (FBC) response to the Second Information Request (C2-021), FBC submitted an "Alternative Route National and Local Economic Assessment" which was a report commissioned in March 2026 by Lancashire County Council, FBC and Wyre Council to "investigate the economic merits of an alternative infrastructure route for the Morgan, Morecambe, and Mooir Vannin offshore wind farms". The Applicants welcome this engagement but note the report does not set out an alternative way of delivering the Morgan and Morecambe transmission project. Rather, it evaluates a fundamentally different strategic infrastructure arrangement involving two UK consented offshore windfarms and a third project, Mooir Vannin, which lies outside of the territorial waters of England and is not yet consented. Consequently, the alternative scenario assessed by FBC is not an alternative that could be delivered through this Application, nor is it within the control of the Applicants. The Applicants also note their position is consistent with the letter from Michael Shanks MP, Minister of State for Energy, appended to C2-021, which states that:

"the statutory planning process for individual Development Consent Order applications remains the appropriate mechanism for assessing project-specific impacts, including local environmental, community and economic considerations, within the scope set out in legislation. Strategic questions about the longer-term evolution of the transmission network are more appropriately considered through NESO's strategic planning functions"

The Applicants approach to co-ordination aligns with the National Policy Statements (see paragraphs 3.3.71 and 3.3.74 of NPS EN-1 and sections 2.8 and 2.13 of NPS EN-5), and delivers the recommendations of the Holistic Network Design Report (HNDR), which is an "important and relevant consideration" in the consenting process (Paragraph 3.3.74 of NPS EN-1).

Newton with Clifton and Freckleton Parish Council and Lancashire Association of Local Councils Fylde Area Committee Energy Working Group have also made submissions on a similar hypothetical alternative Point of Interconnection (POI) at Stanah (and utilising the Hillhouse Technology Enterprise Zone) and suggesting cost savings (quoted as £903M in REP1-083). The Applicants' position on FBC's Economic Assessment is effectively the same as set out in Section 2.2 of their Closing Statement (REP7-042) and in particular sections 2.2.3.9 and 2.2.3.10 (and in REP3-042): (i) the hypothetical alternative proposed involves a different POI which is not available to the Applicants; (ii) it would not align with the recommendations of the HNDR, which itself balanced cost, technical, environmental and community factors and is supported by the NPSs; and (iii) National Grid has confirmed in their response to ExA questions (REP3-088 and REP5-176) that this alternative POI is not suitable. National Grid has also explained it would not simply be a matter of "upgrading" existing overhead lines as suggested but of building a new overhead line from Stanah to Penwortham which *"would make the overall route for the connection longer and in turn less efficient and cost effective"* (REP3-088).

Newton-with-Clifton and Freckleton Parish Councils Comments on Legal Challenge

Newton-with-Clifton and Freckleton Parish Councils in their Response to Second Information Request (C2-007) put the Secretary of State on notice that “approving this project is likely to be the subject of legal challenge from them or one or more of their residents” and set out 6 grounds which are likely to be included in any challenge. The Applicants consider it premature to suggest that the Secretary of State may make a decision susceptible to a legal challenge but would make the following observations on the proposed grounds:

Potential Ground	Applicants' Comments
The rationality of granting powers to be exercised by an unidentified applicant and particular compulsory acquisition powers	The Applicants (and the undertakers under the DCO) are clearly identified - Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd. The DCO contains standard provisions for transfer of benefit (Article 6), financial security requirements (Article 33), and without prejudice drafting options have been proposed if compulsory acquisition powers are not granted for Project A (C2-029.4). The Crown Estate has also confirmed Morgan Offshore Wind Limited will assist The Crown Estate to transfer the relevant DCOs, and the grid connection agreement, to the winning bidder following conclusion of the tender process anticipated for Q4 2026 (C3-006).
The rationality of relying on a s106 agreement (referred to in paragraph 44 of the Secretary of State's first request for information) that is not close to agreement and has inadequate safeguards	See joint statement with Fylde Borough Council (S_SoSQ_66) which explains the parties are close to reaching an agreed form of s106 Agreement.
The lawfulness of granting an application that either increased risk to human life or had an uncompensated adverse effect on a Natura 2000 site, or both	Bird strike risk is addressed through the approval of the Wildlife Hazard Management Plan, to ensure no increased risk to human life, secured by DCO Requirement 27 (REP6-013). BAE Systems has confirmed that subject to an approved WHMP, bird strike risk at Warton Aerodrome will continue to be managed safely (C2-027). Natural England has concluded that Adverse Effect on Integrity (AEoI) on the Ribble and Alt Estuaries SPA can be ruled out, without reliance on mitigation for non-breeding golden plover (C3-005).
The lawfulness of a derogation from Habitats obligations given the existence of an obvious alternative to the project	No derogation from the Habitats Regulations is proposed or required following Natural England's conclusion of no AEoI (see row three above). The Stanah/Hillhouse alternative is not a genuine alternative (see row six below).
The rationality of granting a project with biodiversity net gain proposals that fall so short of the proposals in all other recent consents.	As acknowledged by the Parish Council (C2-007), the mandatory BNG provisions under the Environment Act 2021 do not apply to this project. The Applicants have nonetheless committed to delivering at least 10% biodiversity benefit on a voluntary basis in respect of the permanent above ground infrastructure elements, secured by DCO Requirement 26 (and explained to the Parish Council in C2-029.3). The weight afforded to this in the planning balance is a matter for the Secretary of State.

The rationality of granting a project with its very significant attendant costs and environmental and social impacts, when there exists an obviously material alternative that not only has a fraction of these impacts but would also have additional benefits of local regeneration through site reclamation and job creation.	The purported Stanah/Hillhouse alternative is a hypothetical scheme - a POI at Stanah would be a different project entirely outside the control of the Applicants (REP7-042, Section 2.2.3.10) and National Grid has confirmed the alternative POI is not suitable. As such, it is not an obviously material alternative or an important and relevant consideration for the Secretary of State (REP3-041). In the event that the Secretary of State disagrees and concludes that an alternative project with a different POI is or could be material or relevant to her decision, then the Applicants consider she could safely and reasonably place negligible weight on this purported alternative for the same reasons.
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CONCLUSION

Following the Secretary of State's three Information Requests, the Applicants respectfully submit that substantive progress has been made on all principal outstanding matters, leaving the Secretary of State in a position to determine the Application.

In relation to onshore ornithology, Natural England has advised that Adverse Effects on Integrity can be ruled out on the Ribble and Alt Estuaries SPA (C3-005), confirming that following review of further information provided by the Applicants (C2-029.2), they are satisfied that the substation sites do not represent high confidence Functionally Linked Land and that suitable alternative habitat is available for loafing and foraging golden plover. The Applicants remain committed to mitigating the impacts of the project, and the permanent mitigation measures at land south of Newton-with-Scales have been refined to reduce bird strike risk whilst remaining sufficient to mitigate EIA significant effects on non-breeding wading birds (C2-029, paragraphs 1.3.2.6 - 1.3.2.9). The Secretary of State has options to ensure no temporary adverse effects on integrity – either at Lytham Moss (along with Newton-with-Scales) or seasonal restrictions – all confirmed by Natural England to be effective, with Scenario 3 being Natural England's preferred option (C3-005). There is no longer a need for the Crossens Outer and Banks Marsh alternative areas.

In relation to the Fylde MCZ, DEFRA's Marine Recovery Fund Organisation has confirmed they expect the Marine Recovery Fund library to have a suitable strategic compensation measure (C1-029.39), and it is a matter for the Secretary of State to decide whether to retain the alternative flexibility of project-alone measures.

On bird strike risk and aviation, the Applicants and BAE Systems have reached agreement on the approach to managing bird strike risk, as set out in the joint statement at C2-027. BAE Systems has acknowledged the updates made to the outline Wildlife Hazard Management Plan (C1-029.19), and it is agreed that the detailed Wildlife Hazard Management Plan (secured through Requirement 27 of the DCO and developed post-consent) will include a Communication Protocol setting out agreed data sharing and reporting arrangements. The joint statement records that these measures will ensure information is shared effectively, and that bird strike risk at Warton will continue to be managed safely. The detailed WHMP will also be developed in consultation with DIO. Blackpool Airport has also confirmed satisfaction with the proposed mitigation arrangements (Table 3-1, section 5.5.41 of REP6-181). The Applicants and Blackpool Airport have also agreed to Protective Provisions and combined with Requirement 29 (C1-029.16) of the draft Order, will ensure the safe operation of Blackpool Airport (S_SoSQ_17).

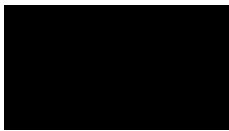
In relation to funding and land powers, The Crown Estate has now launched an accelerated tender for the Morgan offshore wind site and confirmed there will be no gap in liability (C3-006). However, should the Secretary of State be minded to withhold compulsory acquisition powers for Morgan, the project remains viable for an alternative developer through the availability of alternative statutory routes for compulsory acquisition and the progress made on voluntary land negotiations (C2-026 and C2-029). Morecambe OWL has now reached agreement with 66% of affected landowners (representing approximately 72% of the linear

length of the cable) (C2-029). All necessary Section 135 consents have been obtained and protective provisions agreed (C3-008.10).

Matters relating to Landscape and Visual, Construction Hours, Other Onshore Ecology, Farm Business Assessment and Land Powers, Land Use and Recreation, Historic Environment and the Public Sector Equality Duty have been comprehensively addressed by the Applicants (C1-029.39) following the First Information Request.

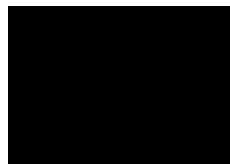
In conclusion, the Applicants submit that as set out in the Closing Statement (REP7-042) and in response to the Secretary of State's three Requests for Information, and taking into account secured mitigation, all principal issues have now been resolved. Where matters of detail remain to be settled, the DCO Requirements framework provides an appropriate mechanism to address these post-consent whilst ensuring adequate controls are in place. The positive benefits of the Transmission Assets outweigh any residual adverse impacts, and the Applicants respectfully invite the Secretary of State to proceed to determine the application.

Kind regards,



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