

FAO Kwasi Kwarteng
The Secretary of State for Business, Energy and Industrial Strategy
c/o James Dawkins
1 Victoria Street
London SW1H 0ET

**Morgan Offshore Wind Farm
Morecambe Offshore Windfarm
Request for direction under section 35 of the Planning Act 2008**

Dear Sir,

We write in relation to the Morgan Offshore Wind Farm, bp/EnBW's proposed offshore wind farm, and the Morecambe Offshore Windfarm, Cobra and Flotation Energy's proposed offshore wind farm, both located in the Irish Sea. As you will be aware, these projects are two of the Round 4 Projects for which you have recently given approval to enter into Agreements for Lease with The Crown Estate.

Morgan Offshore Wind Limited (Morgan OWL) and Cobra and Flotation Energy (together the Applicants) are preparing development consent order applications for their projects that will seek separate consent for the construction and operation of the generation assets. Due to the size of the projects, the generation assets exceed the thresholds for nationally significant infrastructure projects under the terms of the Planning Act 2008.

The Applicants are proposing a co-ordinated solution for the transmission infrastructure required to connect the generation assets of the two offshore wind farms to the national grid. This reflects the outcome of the Offshore Transmission Network Review (OTNR) where both projects will connect at Penwortham. In addition the draft Energy National Policy Statements encourage and support such an approach, and expressly recognise such connections may be consented separately from the wind farms they connect. The intention of Morgan OWL and Cobra and Flotation Energy is to seek a joint consent for the transmission assets. As set out more fully in the enclosed supporting statement, it is considered that this best allows for assessment of and engagement on the transmission infrastructure, as well as co-ordinated consenting and delivery.

Having thoroughly investigated the consenting options available for the transmission infrastructure, Morgan OWL and Cobra and Flotation Energy request that you exercise your power under section 35 of the Planning Act 2008 and direct that the Morgan Offshore Wind Farm (Morgan OWF) and Morecambe Offshore Windfarm (Morecambe OWF) transmission infrastructure both together and individually be treated as development for which development consent is required.

We also request that your direction confirms, pursuant to Sections 35ZA(3)(b) and 35ZA(5) of the Planning Act 2008, that together and individually in respect of the transmission infrastructure for Morgan OWF and Morecambe OWF:

- (1) An application for a consent or authorisation mentioned in section 33(1) or (2) of the Planning Act 2008 be treated as a proposed application for which development consent is required;
- (2) The provisions of or made under the Planning Act 2008 apply in their entirety;
- (3) The National Policy Statements apply to the developments which are the subject of this request, and that any application should be determined in accordance with Section 104 of the Act; and
- (4) To the extent that any consultation carried out by Morgan OWL and/or Cobra and Flotation Energy prior to the date of a Section 35 direction complies with the requirements of Part 5 of the Planning Act 2008 (or any legislation made under that Part), those consultation requirements shall be treated as having been complied with notwithstanding that the consultation was carried out prior to the date of the direction.

The enclosed statement sets out in detail the anticipated works and the basis for this request, but in summary a direction under section 35 is sought because the transmission infrastructure together and individually meets the relevant legal tests and both alone and alongside the Offshore Wind Farms, is considered to be of national significance.

If constructed, with indicative capacities of 1500MW and 480MW, Morgan OWF and Morecambe OWF would have the following benefits:

- Generation of renewable energy to power approximately two million homes every year
- CO₂ emissions savings of up to four million tonnes per year
- The creation of approximately 3000 full time construction jobs
- The creation of approximately 400 full time operational jobs for the lifetime of the projects

The existing and draft revised Energy National Policy Statements confirm that there is an urgent need for new renewable electricity generating capacity. The draft National Policy Statement EN-3 states that the government expects offshore wind to play a significant role in decarbonising the energy system and confirms that the government has set an ambitious target to have 40GW of offshore wind capacity by 2030 (a target recently increased to 50GW by the British Energy Security Strategy). Morgan OWF and Morecambe OWF have an important part to play in meeting this need and reaching this target.

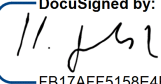
The grid connection infrastructure is needed to deliver the electricity generated into the national grid. Without consent for these works Morgan OWF and Morecambe OWF will not be constructed and will not generate electricity, create jobs or deliver the identified CO₂ savings.

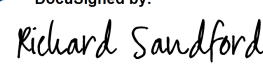
The section 35 direction is sought to ensure that the complex and extensive transmission infrastructure applications are assessed and consulted on in a co-ordinated way and are determined in a timely and consistent manner by the same decision maker. The certainty of the Planning Act process will allow Morgan OWL and Cobra and Flotation Energy to plan and co-ordinate the development of the Offshore Wind Farms and make the £4 billion investment and procurement decisions needed.

We trust this provides you with the information you require and look forward to hearing from you. If you require any further details please do not hesitate to contact us.

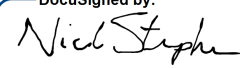
For and on behalf of

MORGAN OFFSHORE WIND LIMITED
acting by:

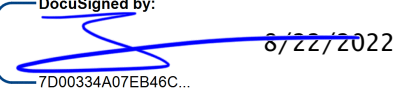
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FLOTATION ENERGY PLC
acting by:

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COBRA INSTALACIONES Y SERVICIOS S.A.
acting by:

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