

Partners in UK offshore wind

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Department for Energy Security & Net Zero 1 Victoria Street London SW1H 0ET

**By Email Only** 

Department Lead Consent Manager Phone +44 7500 029144

Reference MVCNS-J1901-JVW-00003

2024-02-14

## Morven Offshore Wind Farm Transmission Assets Request for direction pursuant to Section 35 of the Planning Act 2008

Dear Mr Dawkins

Morven Offshore Wind Limited (**MvOWL**) is developing the Morven Offshore Wind Farm (**Morven**) which is a commercial scale fixed-foundation offshore wind farm located approximately 60km from the Aberdeenshire coast in the Scottish part of the renewable energy zone. MvOWL is a joint venture between BP Alternative Energy Investments (**bp**) and German partner Energie Baden-Württemberg AG (**EnBW**).

The Morven array was identified as a result of the ScotWind leasing round and is located in Plan Option area E1 identified in the Scottish Government's Sectoral Marine Plan for Offshore Wind.

The transmission system solution for Morven is being identified as a result of the Holistic Network Design (HND) pursuant to the Offshore Transmission Network Review (OTNR). HND-Phase 1 recommends a connection to an offshore network consisting of radial, non-radial and onshore transmission assets (Grid Connection 1). The network may have several generation users in addition to Morven and associated points of interconnection (POI) at Fetteresso, Hawthorn Pit, Creyke Beck and Lincolnshire Connection Node. It should be noted that whilst the HND process has noted a strong preference for a coordinated approach there is still a possibility that the connection could be radial and non-coordinated. MvOWL will contribute electricity generated from the Morven array to this network, with the remaining capacity of Morven to be allocated a grid connection solution as part of the ongoing HND FUE process, which is not considered further or included in this request.

MvOWL will seek necessary consents from the Scottish Ministers to construct and operate the Morven generating assets and the Morven transmission assets located within Scottish waters. This will include a section 36 consent under the Electricity Act 1989, and marine licences under the Marine and Coastal Access Act 2009 (and for any assets within Scottish territorial waters – the Marine (Scotland) Act 2010). The transmission cables and any other



infrastructure forming part of Grid Connection 1 located in Scottish waters will be consented via marine licence application to the Scottish Ministers.

MvOWL will also be seeking necessary consents for the transmission assets forming part of Grid Connection 1 located in England, English territorial waters and the English part of the renewable energy zone (**Grid Connection 1 – England**), and it is these assets which are the subject of this section 35 direction request. The necessary consents for Grid Connection 1 – England may be promoted by MvOWL or through another company entity and as such, this request is not expressed to be personal to MvOWL or any other party.

A plan showing an indicative location of Grid Connection 1 - England is appended to this request.

Having thoroughly investigated the consenting options available for Grid Connection 1 – England, MvOWL request that the Secretary of State exercises the power under section 35 of the Planning Act 2008 to direct that the transmission assets forming Grid Connection 1 – England are to be treated as development for which development consent is required.

In accordance with section 35 of the Planning Act 2008, Grid Connection 1 – England forms part of a proposed project in the field of energy, being the Morven Offshore Wind Farm (s35(2)(a)(i)), Grid Connection 1 – England will be located in England, English territorial waters and in the English part of the renewable energy zone (s35(2)(b) and s35(3)) and Grid Connection 1 – England will be in itself of national significance for the reasons specified below and in the accompanying supporting statement (s35(2)(c)).

We also request that the Secretary of State's direction confirms, pursuant to Sections 35ZA(3)(b) and 35ZA(5) of the Planning Act 2008, that:

(1) Grid Connection 1 – England is an application for a consent or authorisation mentioned in section 33(1) or (2) of the Planning Act 2008 which should 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 Grid Connection 1 - England, and that any application should be determined in accordance with Section 104 of the Planning Act 2008; and

(4) To the extent that any consultation carried out by MvOWL 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 supporting 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 Grid Connection 1 – England meets the relevant legal tests in section 35 (as demonstrated above) and is considered to be of national significance.

The Planning Act 2008 regime is supported by a suite of statutory National Policy Statements (**NPS**). The NPS for Energy were recently updated and were designated in January 2024. Paragraph 4.2.4 of NPS EN-1 establishes that there is a critical national



priority (**CNP**) for the provision of nationally significant low carbon infrastructure. Low carbon infrastructure for the purposes of this policy includes offshore wind projects and electricity grid infrastructure, and specifically includes as CNP infrastructure (4.2.5):

"for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore".

As a grid connection necessary to deliver renewable electricity from the Morven Offshore Wind Farm to the national grid, as part of a coordinated electricity transmission solution following the OTNR and HND-Phase 1, it is evident that Grid Connection 1 – England is CNP infrastructure and is of national significance.

The section 35 direction is therefore sought to ensure that the complex and extensive transmission infrastructure application is assessed and consulted on in a co-ordinated way and is determined in a timely and consistent manner by the same decision maker. The certainty of the Planning Act 2008 process will allow MvOWL to plan the development of Morven Offshore Wind Farm and make the investment and procurement decisions needed to contribute to the UK's legally binding decarbonisation targets and security of supply.

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 [redacted].

p.p.

PROGRAMME DIRECTOR MORVEN OFFSHORE WIND LIMITED PROGRAMME DIRECTOR MORVEN OFFSHORE WIND LIMITED

## **Morven Offshore Wind Farm**

#### Supporting Statement for Section 35 Direction

## 1. BACKGROUND

- 1.1. Morven Offshore Wind Limited (MvOWL) is a joint venture between bp and Energie Baden-Wuerttemberg AG (EnBW). bp has set out an ambition to be a net zero company by 2050, or sooner, and recently announced its strategy for delivering on that ambition. This strategy will see bp transform from an international oil company producing resources to an integrated energy company providing solutions to customers. bp already has a significant onshore wind business in the US with a gross generating capacity of 1.7GW, operating nine wind assets across the country. EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers. EnBW was among the pioneers in offshore wind power with its EnBW Baltic 1 offshore wind farm in the Baltic Sea. In 2020, the company commissioned Germany's biggest offshore wind farm project to date, EnBW Hohe See and Albatros, with a combined capacity of 609MW.
- 1.2. MvOWL is developing the Morven Offshore Wind Farm (Morven), which is a proposed largescale fixed-foundation offshore wind farm (OWF) located approximately 60km from the Aberdeenshire coast. Morven is expected to include:
  - 1.2.1. up to 191 wind turbines and associated support structures and foundations;
  - 1.2.2. up to 844km of inter-array cables and up to 751km of interconnector cables;
  - 1.2.3. up to 11 Offshore Substation Platforms (OSPs) and associated support structures and foundations.
- 1.3. To maximise efficient use of the seabed, it is not intended that the generating capacity of Morven is capped, however it is a substantial offshore wind project capable of delivering multiple GWs of renewable energy to the national grid.
- 1.4. Transmission infrastructure is required to connect Morven to the national grid. The expected scope of that infrastructure is summarised below and expanded upon in section 2 below.
- 1.5. The transmission system solution for Morven is being identified as a result of the Holistic Network Design (HND) pursuant to the Offshore Transmission Network Review (OTNR). HND-Phase 1 recommends a connection to an offshore network consisting of radial, non-radial and onshore transmission assets (Grid Connection 1). The network may have several generation users in addition to Morven and associated points of interconnection (POI) at Fetteresso, Hawthorn Pit, Creyke Beck and Lincolnshire Connection Node. MvOWL will contribute electricity generated from the Morven array to this network, with the remaining capacity of Morven to be allocated a grid connection solution as part of the ongoing HND FUE process, which is not considered further in this request. It should be noted that whilst the HND process has noted a strong preference for a coordinated approach there is still a possibility that the connection could be radial and non-coordinated.
- 1.6. MvOWL has identified a number of consenting options to deliver the infrastructure required for Morven. The opportunities and challenges of each consenting option have been assessed and following detailed consideration, the consenting strategy for the Morven Array and Grid Connection 1 has confirmed that the following consents will be sought:
  - 1.6.1. The Array Project (wholly in Scottish Waters):

Marine licences under the Marine and Coastal Access Act 2009 (a separate licence will be sought for the generating assets and a licence for the OSPs) and a Section 36 consent under the Electricity Act 1989 for the generating assets.

1.6.2. Grid Connection 1:

- (a) marine licence sought under the Marine and Coastal Access Act 2009 (for the relevant export cabling and other infrastructure located in Scotland).
- (b) subject to this request for a section 35 direction being granted, a Development Consent Order for the remaining length of offshore cable, landfall works, onshore cable works, onshore convertor station, associated activities and all necessary land rights (within England, English waters and the English part of the Renewable Energy Zone).

# 2. NATURE AND EXTENT OF PROPOSED TRANSMISSION ASSETS PROJECTS

- 2.1. As noted above, Morven has fallen into the scope of the HND and subsequent Holistic Network Design Follow Up Exercise (HNDFUE). HND has now concluded and as part of the ESO output, Morven has been determined to be part of a coordinated offshore system, The East Coast Transmission System. This system comprises of generators facilities and transmission assets alike which expand the capacity of the National Electricity Transmission System from land to the North Sea to form an efficient overall network. Within the East Coast Transmission System, there are two main zones of interfacing, the Northern Hub and the Southern Hub, with Morven contributing and interfacing in the Northern Hub.
- 2.2. Grid Connection 1 is the HVDC transmission system from the Morven Array to the National Grid connection location at Hawthorn Pit. A plan showing the location of Grid Connection 1 is attached (Figure 1),
- 2.3. The Northern Hub or the East Coast Transmission system also host facilities and connections from other developers and transmission operators. These are referred to as radial and onshore transmission assets, noting that while called onshore transmission, the facilities are placed within the North Sea.
- 2.4. Grid Connection 1 between the Morven Array and the National Grid connection location at Hawthorn Pit has been classified as "Offshore non-radial". As a result of this classification, MvOWL will develop the system design of and seek consent for Grid Connection 1. MvOWL will therefore be seeking necessary consents for the transmission assets forming part of Grid Connection 1 located in England, English territorial waters and the English part of the renewable energy zone (Grid Connection 1 England), and it is these assets which are the subject of this section 35 direction request. The necessary consents for Grid Connection 1 England may be promoted by MvOWL or through another company entity and as such, this request is not expressed to be personal to MvOWL or any other party.
- 2.5. The key components of Grid Connection 1 are likely to include a combination of assets, as described further below. The components of Grid Connection 1 England which are the subject of this request are detailed at section 2.7 below. A plan showing the location of Grid Connection 1 England is attached (Figure 2).
- 2.6. Key components of Grid Connection 1 anticipated to comprise:
  - 2.6.1. Offshore substation platforms HVDC/HVAC located in Scottish waters;
  - 2.6.2. Inter-connector cables located in Scottish waters;
  - 2.6.3. Offshore export cables located in Scottish and English waters;
  - 2.6.4. Cable landfall site, comprising transition joint bays to connect the offshore and onshore cables located in England;
  - 2.6.5. Onshore export cables located in England;
  - 2.6.6. Onshore substation located in England.

As noted above, this request for a section 35 direction comprises the components of Grid Connection 1 which are located within England and English waters (territorial and the REZ). These components are hereinafter referred to as Grid Connection 1 – England.

- 2.7. Grid Connection 1 England is expected to include:
  - 2.7.1. Up to four offshore export cables, each approximately 260 km long and associated works;
  - 2.7.2. A landfall site, comprising transition joint bays to connect the offshore and onshore cables, and associated works;
  - 2.7.3. Up to four onshore cables, each up to approximately 16km long and associated works;
  - 2.7.4. An onshore substation; and
  - 2.7.5. Cables from the onshore substation to the Hawthorn Pit national grid connection point.

# 3. SECTION 35 CONSIDERATIONS

- 3.1. Under section 35 of the Planning Act 2008, the Secretary of State has the power to direct that development be treated as development for which development consent is required.
- 3.2. The conditions under which such a direction can be made are that:
  - 3.2.1. development must either be, or form part of, a project in the fields specified in section 35(2)(a);
  - 3.2.2. the development will be in an area set out in section 35(3); and
  - 3.2.3. the Secretary of State thinks that the project is of national significance, either by itself or when considered with one or more other projects or proposed projects in the same field.
  - 3.2.4. In accordance with section 35 of the Planning Act 2008, Grid Connection 1 England forms part of a proposed project in the field of energy, being the Morven Offshore Wind Farm (s35(2)(a)(i)), will be located in England, English waters and in the English part of the renewable energy zone (s35(2)(b)) and will be in itself of national significance for the reasons specified in this accompanying supporting statement (s35(2)(c)).
- 3.3. Section 4 below sets out the reasons why the project is considered to be of national significance.

# 4. JUSTIFICATION FOR DIRECTION FOR GRID CONNECTION 1 - ENGLAND

4.1. The Planning Act 2008 regime is supported by a suite of statutory National Policy Statements (NPS). The NPS for Energy were recently updated and were designated in January 2024. Paragraph 4.2.4 of NPS EN-1 establishes that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Low carbon infrastructure for the purposes of this policy includes offshore wind projects and electricity grid infrastructure, and specifically includes as CNP infrastructure (paragraph 4.2.5, fourth bullet):

"for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of "low carbon", such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore".

4.2. As a grid connection necessary to deliver renewable electricity from the Morven Offshore Wind Farm to the national grid, as part of a coordinated electricity transmission solution following the OTNR and HND-Phase 1, it is evident that Grid Connection 1 – England is CNP infrastructure and is of national significance.

- 4.3. The United Kingdom Government has concluded that there is a clear and established need for large scale offshore wind projects and associated electricity transmission works and that this need is also established for energy infrastructure such as Grid Connection 1 England which serves those purposes. Whilst the Morven Array does not fall within the Planning Act 2008 regime given its location in Scottish waters, as a large scale (>100MW) offshore wind project, it would be CNP Infrastructure if it were located in England. As an offshore generating station and offshore high voltage transmission, Morven is also "national development" in Scotland, pursuant to National Planning Framework 4.
- 4.4. In addition, the NPS do not limit CNP infrastructure status to the generating station itself, and also includes transmission assets as noted above. NPS EN-1 also states:
  - *"4.11.1 The connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend a generation plant.*
  - 4.11.2 In the market system and in the past, it has been for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated.
  - 4.11.3 To support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development and transmission.
  - 4.11.4 Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. Further guidance can be found in Section 4.2 of this NPS and EN-5. "

Taken together, as CNP Infrastructure itself, and as an essential requirement to facilitate and deliver substantial offshore wind capacity, Grid Connection 1 – England benefits from the highest form of policy support, as established in the NPS and is unequivocally of national significance.

4.5. As noted above, Grid Connection 1 has also been identified as part of the OTNR HND-Phase 1 process. Co-ordination of offshore wind transmission works is encouraged and supported by NPS EN-1 and NPS EN-5. Paragraph 4.11.10 of National Policy Statement EN-1 expressly states that "It is recognised that this may be the situation for some new offshore transmission projects, where applications for consent may be brought forward separate (though planned with) the applications for associated wind farms as outlined in EN-5."

# 5. UK GOVERNMENT LEGAL OBLIGATIONS AND POLICY

- 5.1. This need established by the National Policy Statements is underpinned by the UK Government's legal obligations and policy commitments.
- 5.2. The Climate Change Act 2008 introduced a legally binding climate change mitigation target for the UK to reduce its greenhouse gas emissions by 80% by 2050, compared to 1990 levels. This was amended to a legally binding target of 100% by 2050 through The Climate Change Act 2008 (2050 Target Amendment) Order 2019. The Committee on Climate Change's (the CCC) sixth carbon budget (running from 2033-2037), which will require a 78% reduction in emissions by 2035, was introduced in April 2021. The UK Government has also set an ambition for all electricity generation to be decarbonised by 2035 (Build Back Greener, October 2021).
- 5.3. The first key commitment of The Energy White Paper (HM Government, 2020) is a target for 40GW of offshore wind by 2030. This echoed Point 1 of the Ten Point Plan for a Green Industrial Revolution, which set out the aim to produce 40GW of offshore wind by 2030. The more recent British Energy Security Strategy has only strengthened this commitment by setting an ambition to deliver up to 50GW of offshore wind by 2030.

5.4. As a large-scale renewable energy project of proven technology, Morven is essential in securing the delivery of the Government's renewable energy strategy and achieving the legally binding emissions reduction targets. The timely and consistent consenting of the necessary grid connection infrastructure of which Grid Connection 1 – England forms an integral part, is critical to that delivery.

## 6. COMPARISON WITH OTHER NATIONALLY SIGNIFICANT INFRASTRUCTURE PROJECTS

- 6.1. Electricity lines are recognised in the Planning Act 2008 as capable of being nationally significant infrastructure projects. The threshold that is applied is that the line is over ground, 132kV or above, and over 2km in length. The requirement for consent from the Secretary of State, originally under the Electricity Act and subsequently the Planning Act, reflects the importance placed on these works.
- 6.2. The grid connection cables comprised in Grid Connection 1 England could be up to 535kV. MvOWL is committed to minimising the impacts of Grid Connection 1 and as a result is seeking to install the cables underground, notwithstanding the length of the connections and the increased cost when compared to overhead lines. Were it to be necessary to install a section of more than 2km of the onshore cable over ground in England this would need to be determined as a nationally significant infrastructure project.
- 6.3. Changes to section 35 were enacted to allow developers of business and commercial projects to voluntarily have their projects treated as NSIPs to allow them to benefit from the "statutory timetabling... and the 'one stop shop' approach to development consent ". These are among the reasons that MvOWL is seeking a section 35 direction. In a policy statement issued following this extension of the NSIP regime to business and commercial projects, the Government identified the following relevant factors in this regard:

"In considering whether a project is of national significance, the Secretary of State will consider all relevant matters, including:

(a) whether a project is likely to have a significant economic impact, or is important for driving growth in the economy;

Grid Connection 1 – England will drive growth in the economy by enabling the Morven Offshore Wind Farm and potentially other coordinated projects. Detailed costings have not yet been prepared, but Morven alone is likely to require over £3 billion of investment in order for the project to be delivered, of which a significant proportion is attributable to Grid Connection 1 – England.

(b) whether a project has an impact across an area wider than a single local authority area;

Grid Connection 1 will be located cross-border between Scotland and England, and Grid Connection 1 – England will be located within the English REZ and English territorial waters (under the jurisdiction of the MMO) and in the local authority district of Durham County Council and/or Sunderland City Council.

(c) whether a project is of a substantial physical size – further details are set out below;

Grid Connection 1 is of a substantial physical size, as is Morven, as demonstrated via the parameters identified in Section 2 above.

(d) whether a project is important to the delivery of a nationally significant infrastructure project or other significant development.

Grid Connection 1 – England is CNP infrastructure and is also critical to the delivery of Morven Offshore Wind Farm, and potentially other coordinated projects.

(e) Although size in itself will not be the determining factor in whether a project is nationally significant or not, the Secretary of State would not normally expect to receive requests for directions in relation to projects that are not of a substantial size."

Grid Connection 1 – England is of a very substantial size and is an integral part of a wider cross-border transmission project.

- 6.4. The Secretary of State has to date granted section 35 directions to several network NSIPs as follows:
  - 6.4.1. Nautilus Interconnector;
  - 6.4.2. AQUIND Interconnector;
  - 6.4.3. Triton Knoll Electrical System;
  - 6.4.4. Eurolink Multipurpose Interconnector;
  - 6.4.5. Xlinks Morocco to UK Power Project.
- 6.5. These projects are similar in character to the project, in that each comprises onshore and offshore high voltage cables and related infrastructure for the purposes of electricity transmission or interconnection. All were recognised to be complex and to have the potential to deliver wider benefits, and without the section 35 directions each would have required a number of separate consents.
- 6.6. The Planning Act regime was considered to be the most appropriate and effective way to consider and reach a decision on these projects. The transmission infrastructure comprised in Grid Connection 1 - England is clearly comparable to other NSIPs and should also be able to benefit from a section 35 direction to enable a DCO application to be submitted pursuant to the Planning Act 2008.

# 7. POTENTIAL TO STREAMLINE PROCESS TO ENSURE EARLY DELIVERY AND HOLISTIC PROCESS

## Separate consenting processes

- 7.1. In the absence of a section 35 direction, the transmission assets in Grid Connection 1 England will require multiple separate consents, from different decision-makers: (a) the offshore works will require marine licence(s) from the MMO; and (b) the onshore works from the relevant local planning authority or authorities.
- 7.2. This complex consenting position has the clear potential to lead to differences of approach being taken on the same works in the same location (e.g. in the intertidal area), and for delays and inconsistencies in the determination of the applications, the consents granted and in securing the necessary rights. There is the potential for significant delays to the delivery of the transmission assets if the applications need to be determined by the Secretary of State following a public inquiry.
- 7.3. In the absence of a section 35 direction MvOWL faces uncertainty and potentially significant delays in the consenting of the necessary transmission assets that will in turn delay the delivery of the generation assets for Morven.

## **Compulsory Acquisition**

7.4. MvOWL is likely to need to rely on compulsory acquisition powers to acquire some of the land and rights required to deliver the transmission infrastructure in Grid Connection 1 – England. Without a section 35 direction compulsory purchase order would need to be promoted separately, and without the benefit of the timelines prescribed by the Planning Act 2008. In addition, uncertainty about the delivery of all required consents may prejudice the grant of powers of compulsory acquisition. This has the potential to lead to additional costs and delays that could otherwise be avoided and to hinder the urgent deployment of renewable energy capacity to the national grid.

## Streamlining Process

7.5. The Planning Act was designed to streamline the process for consenting nationally significant infrastructure. A section 35 direction would ensure that the effects, impacts and benefits of the works are considered in a consistent and timely manner that does not delay the prompt delivery of the much-needed new renewable electricity capacity, in accordance with the Government's energy policy.

# Local Planning Authorities

7.6. MvOWL has been in contact with the relevant local planning authorities (Durham County Council and Sunderland City Council) as part of general stakeholder engagement and will shortly inform them of their intention to apply to the Secretary of State for a section 35 direction for the transmission assets comprised in Grid Connection 1 - England. MvOWL is committed to working constructively with the relevant local planning authority(ies) throughout the consenting process, including as a key statutory stakeholder for any subsequent DCO application. Likewise, MvOWL is planning engagement with the MMO and PINS to inform them of the section 35 direction application.

# 8. SUMMARY

- 8.1. In summary, a section 35 direction is sought for the Grid Connection 1 England because it meets the legal tests and is, for the following reasons, of national significance:
  - 8.1.1. It comprises large scale, complex, co-ordinated and high value infrastructure works;
  - 8.1.2. It is CNP infrastructure and is also needed to deliver substantial offshore wind generating capacity, which is urgent and essential to deliver the UK's legally binding decarbonisation targets and to contribute to security of supply. The UK Government has also set an ambition for all electricity generation to be decarbonised by 2035;
  - 8.1.3. Government policy confirms that there is an urgent need for offshore wind farms and the infrastructure required to connect them to the grid, and supports and encourages a coordinated approach to offshore wind transmission; and
  - 8.1.4. It will deliver much needed investment and secure jobs in the UK.
- 8.2. There are major benefits to consenting Grid Connection 1 England as an NSIP in that:
  - 8.2.1. The Energy NPSs can be given appropriate consideration and weight in the decision making process; and
  - 8.2.2. The timetabling certainty will allow MvOWL to plan the procurement and investment decisions and other activities needed to deliver Morven.
- 8.3. Grid Connection 1 England is similar in scale and complexity to other NSIPs, including those that have been the subject of previous section 35 directions and the section 35 direction should be granted as applied for.



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Partners in UX offshore wird	Drawing Numb BP-GBR-MO	er: RV-PRJ-0044			LEGEND Morven Lease Area Morven Grid Connection	4				
Project Name: MORVEN OFFSHORE WIND FARM	Data Sources:				Morven Grid Connection 1 - England - boundary subject to the s35 direction (Onshore)	North				
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Partners in UK offshore wind	Drawing Number: BP-GBR-MORV-PRJ-0043				LEGEND Morven Lease Area Morven Indicative Grid			
Project Name: MORVEN OFFSHORE WIND FARM	Data Sources	:			Morven Indicative Grid Connection 1 Boundary (Offshore) Scotland Adjacent			
Drawing Title: Geodetic Information:   FIGURE 1: MORVEN OVERVIEW World Tpographic May: End UK: End, Tom Tom, Gamme, Foursquare, FAQ, METINASA, USGS   World Tpographic May: End Weit, Gamme, Face, MERE, Gamme, FAQ, NACH, METINASA, USGS World Tpographic May: End Weit, Tom Tom, Gamme, FAQ, METINASA, USGS					Waters Limit			
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