

East Irish Sea Transmission Project

Request for Section 35 Direction –
Supporting Statement

Document Number: 08815585

Revision Summary					
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1 Background

1.1 Introduction

- 1.1.1.1 This statement is prepared by Mooir Vannin Offshore Wind Farm Limited (Company Registration Number: 013051V) (**MVOWFL**) as a qualifying request for a direction from the Secretary of State under section 35 of the Planning Act 2008 for those components of its proposed Mooir Vannin Offshore Wind Farm (**Mooir Vannin OWF**) Project located in the English jurisdiction to be treated as nationally significant infrastructure for which development consent is required.
- 1.1.1.2 MVOWFL, a wholly owned subsidiary of Ørsted A/S, is developing the Mooir Vannin OWF. Ørsted A/S is one of the world's most sustainable energy companies and is the global leader in construction and operation of offshore wind farms. Ørsted A/S has more than 30 years of experience and an established reputation in delivering successful projects, with approximately 8.9 GW of operational offshore wind farms worldwide.
- 1.1.1.3 Mooir Vannin OWF is a proposed fixed-foundation offshore wind farm (**OWF**) with an indicative capacity of c. 1.4 GW. It is the first OWF to be developed in the Isle of Man's territorial seas, where the offshore array will be located approximately 6 - 12 nautical miles off the east coast of the island. Mooir Vannin OWF is expected to include:
- up to 100 wind turbines and associated support structures and foundations;
 - cabling, with up to: 490km of array cables, 100km of interlink cables, 90km of export cables to the Isle of Man, and 125km of offshore electrical connection cables within the Isle of Man waters; and
 - up to five offshore substations and associated support structures and foundations.
- 1.1.1.4 MVOWFL is preparing an application for a Marine Infrastructure Consent for submission to the Isle of Man Government for the Mooir Vannin OWF comprising the offshore array, transmission assets and landfall assets, entirely within the Isle of Man's jurisdiction. Some of the energy generated from the Mooir Vannin OWF will also be transmitted to England.
- 1.1.1.5 With respect to the connection in England, MVOWFL has secured a grid connection agreement with the National Grid Electricity System Operator for proposed connection into the Penwortham Substation. The parameters of the transmission infrastructure project to be located in English waters and to connect Mooir Vannin OWF to the grid in England (the **East Irish Sea Transmission Project**), and the elements of the East Irish Sea Transmission Project that are considered as the '**Proposed Development**', for which this section 35 direction is sought, are described in detail in **Sections 1.2** and **1.3** respectively. The necessary consents for the East Irish Sea Transmission Project may be promoted by MVOWFL or through another company entity and as such, this request is not expressed to be personal to MVOWFL or any other party.
- 1.1.1.6 MVOWFL's consenting strategy includes:
1. Marine Infrastructure Consent pursuant to the Marine Infrastructure Management Act 2016 from the Isle of Man Government for the Mooir Vannin OWF and transmission assets located within the Isle of Man's jurisdiction; and

2. Subject to this request for a section 35 direction being granted, a Development Consent Order (**DCO**) under the Planning Act 2008 for the Proposed Development (and where the remaining East Irish Sea Transmission Project would be considered 'associated development' under section 115 Planning Act 2008 and therefore included in the DCO). Other consents and licences may be required in relation to the Project and these would be obtained in due course.

1.1.1.7 MVOWFL has consulted with the relevant Local Planning Authorities (**LPAs**) and the Marine Management Organisation (**MMO**) in relation to MVOWFL's intention to submit this request for a section 35 direction. Copies of the letters of support received from both the LPAs and the MMO is provided in **Appendix A**. Further information on stakeholder engagement is outlined in **Section 3**.

1.2 Nature and extent of the East Irish Sea Transmission Project

1.2.1.1 The Moir Vannin OWF 'Whole Project' is comprised of the offshore array (generation and transmission assets) contained within the Agreement for Lease (AfL) area, associated transmission infrastructure connecting the array to an onshore grid connection wholly within the Isle of Man's jurisdiction, and the East Irish Sea Transmission Project within English waters and connection to the grid in England.

1.2.1.1 An indicative plan showing the extent of the proposed Moir Vannin AfL and , the East Irish Sea Transmission Project indicative boundary and the status of other nearby wind farms is attached as **Figure 1**. The East Irish Sea Transmission Project is proposed to fall within the area shaded green on the plan in Figure 1. The indicative plan at **Figure 2** shows the LPA boundaries and the location of the Penwortham Substation, which is near Preston in the north-west of England. MVOWFL is continuing to explore potential route planning and site selection options for the East Irish Sea Transmission Project and will present and consult on its proposals with stakeholders in due course.

1.2.1.2 The proposed East Irish Sea Transmission Project extends from the boundary of the Isle of Man territorial waters and English offshore waters, through English territorial waters to landfall, and onshore to the Penwortham Substation. It is anticipated that the key components of the East Irish Sea Transmission Project would comprise:

- (a) an **Onshore Substation**, which will be a high-voltage alternating current (**HVAC**) system or high-voltage direct current (**HVDC**) system;
- (b) **Energy Balancing Infrastructure (EBI)**, which may include Battery Energy Storage Systems (**BESS**), Long Duration Energy Storage (**LDES**) or conversion to other energy carriers such as **P2X** (e.g. hydrogen); and
- (c) **associated development**, which includes but is not limited to:
 - i. up to four (in four circuits) HVAC, or four (in two circuits) HVDC offshore export cables extending from the England offshore limits to landfall;
 - ii. up to three offshore booster stations if HVAC transmission technology is used;
 - iii. a landfall, including up to six transition joint bays;
 - iv. up to twelve (in four circuits) HVAC, or four (in two circuits) HVDC onshore export cables (which could include a short section, in the region of less than 500m total route length, of overhead lines);
 - v. onshore cables to connect the onshore substation to the National Grid Substation at Penwortham; and

- vi. other temporary and permanent works.

1.3 The Proposed Development to which this request relates

- 1.3.1.1 The Proposed Development to which this section 35 direction application relates are the:
1. Onshore Substation, which converts electricity generated from Moir Vannin OWF into a compatible voltage for the national grid; and
 2. EBI, which is required to act as a buffer to balance and store electricity produced by the OWF and imported from the grid to match consumption needs. The grid balancing services of the EBI would mean that it would enable both import and export to the grid, releasing electricity when needed.
- 1.3.1.2 The Proposed Development does not meet the definition of a 'nationally significant infrastructure project' (**NSIP**) under sections 14 – 30 of the Planning Act 2008. However, MVOWFL considers that the construction and operation of the Proposed Development is nationally significant development for which development consent under the Planning Act 2008 should be required, and therefore seeks that the Secretary of State exercise his powers under section 35 Planning Act 2008 to recognise the Proposed Development as such.
- 1.3.1.3 The Proposed Development constitutes the key infrastructure in England and is comparable in form and function to those elements of other NSIPs which automatically fall within the Planning Act 2008 categories where development consent is required. Therefore, in a similar manner to how certain key components of development were defined and accepted to be treated as NSIPs for other interconnector projects, MVOWFL considers that a section 35 direction is the most appropriate way to recognise the Proposed Development as 'nationally significant' (and other development as associated development).
- 1.3.1.4 MVOWFL understands that the Secretary of State may consider the approach of selecting and defining specific elements of the development at this request stage may not be necessary, however, MVOWFL considers that the remaining elements of the East Irish Sea Transmission Project listed in paragraph 1.2.1.2(c) are also likely to benefit from inclusion in the DCO as 'associated development'. This is because MVOWFL considers that the associated development are not elements for which development consent should be required, but it recognises that transmission infrastructure and associated works would typically be included in DCOs for other projects in the energy field as 'associated development' pursuant to section 115(2) Planning Act 2008. MVOWFL has reached this view in accordance with the UK Government's 'Guidance on associated development applications for major infrastructure projects' (April 2013) (**AD Guidance**) that such works are usually considered as development associated with the NSIP. The AD Guidance confirms that 'it is for applicants to decide whether to include something that could be considered as associated development in an application for development consent or whether to apply for consent for it via other routes,' and that this should be done through a single DCO application.

2 Request for Section 35 Direction

2.1 Section 35 considerations

- 2.1.1.1 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.
- 2.1.1.2 The conditions under which such a direction can be made are that:
- (a) the development must either be, or form part of, a project in the fields specified in section 35(2)(a);
 - (b) the development will be in an area set out in section 35(3); and
 - (c) the Secretary of State considers 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.
- 2.1.1.3 In accordance with section 35 of the Planning Act 2008, the Proposed Development is: in the field of energy, being part of the Moir Vannin OWF which crucially converts electricity generated by the OWF and supplies it to the grid in England and also provides grid balancing services (s35(2)(a)(i)); will be located in England, (with proposed associated development in 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 set out in this accompanying Supporting Statement (s35(2)(c)).
- 2.1.1.4 **Section 2.2** below sets out the reasons why the Proposed Development is of national significance.

2.2 Justification for Direction for the Proposed Development

- 2.2.1.1 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: Overarching NPS for Energy 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”.*
- 2.2.1.2 As the onshore substation is necessary to deliver renewable electricity from Moir Vannin OWF to the national grid as part of the electricity transmission solution for an offshore wind farm, and the EBI is required to provide grid balancing services, it is evident that the Proposed Development is CNP infrastructure and is of national significance.
- 2.2.1.3 The UK 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 the Proposed Development which serves those purposes. Whilst the Moir Vannin OWF offshore array does not fall within the Planning Act 2008 regime, given its location in Isle of

Man territorial seas, as a large scale (>100MW) offshore wind project, it would be CNP infrastructure if it were located in England.

2.2.1.4 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."

2.2.1.5 The Proposed Development benefits from the highest form of policy support because it is both CNP infrastructure itself and is essential to facilitate delivery of substantial offshore wind capacity.

3 Stakeholder Engagement

3.1 Engagement regarding request for Section 35 direction

3.1.1.1 MVOWFL has engaged with key stakeholders prior to the submission of this request for a section 35 direction and will continue to do so. Meetings have been held with the relevant LPAs, Natural England, the Marine Management Organisation (**MMO**), National Grid, the Department for Energy Security and Net Zero (**DESNZ**) and other Round 4 offshore wind farm developers in the Irish Sea. During the meetings with stakeholders, MVOWFL introduced the Moir Vannin OWF project in its entirety, including the East Irish Sea Transmission Project (and by natural consequence, the Proposed Development) and the proposed consenting pathway. The Planning Inspectorate has also been contacted and has acknowledged MVOWFL's intention to make this request for a section 35 direction.

3.1.1.2 MVOWFL has met with all of the LPAs within the East Irish Sea Transmission indicative boundary outlined in the indicative onshore plan in **Figure 2**. The LPAs that MVOWFL has engaged with to date include:

Local Planning Authority	Date of Meeting	Letter of Support
Wyre	27/06/2024	Received
Preston	04/06/2024	Received
Fylde	21/05/2024	Not Received
Blackpool	03/06/2024	Received
South Ribble	21/05/2024	Received
Sefton	04/07/2024	Received
West Lancashire	23/05/2024	Not Received
Chorley	21/05/2024	Received

3.1.1.3 MVOWFL has received letters from a number of relevant LPAs and the MMO which support its request for a section 35 direction, and its intention to seek a DCO under the Planning Act 2008. These letters are provided at **Appendix A**.

3.2 Future pre-application engagement

3.2.1.1 Subject to the Secretary of State making the section 35 direction as requested, MVOWFL will proceed to a pre-application phase of consultation with the key stakeholders including statutory and non-statutory stakeholders, and the local community relevant to the DCO process. This will include formal consultation as prescribed under sections 42, 47 and 48 of the Planning Act 2008. Informal consultation will also take place, including prior to the submission of the EIA Scoping Report.

4 UK Government Legal Obligations and Policy

4.1.1.1 The need for Moir Vannin OWF and by extension the consequential justification for the Proposed Development to be treated as an NSIP, is clear given the country's prioritisation of nationally significant low carbon infrastructure established by the NPS, as underpinned by the UK Government's legal obligations and policy commitments.

4.1.1.2 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).

4.1.1.3 The NPSs establish the UK Government's clear objective for its energy system to be "secure, reliable and affordable, and consistent with net zero emissions in 2050." It appreciates, as is the case here with this request for a section 35 direction, that this may be achieved through flexible and split consenting pathways, where "it is anticipated that some proposals for transmission may be consented separately to those for the windfarm (array) application." (NPS EN-5: Electricity Networks Infrastructure, paragraph 2.12.8).

4.1.1.4 The urgent need for new electricity infrastructure – including substations and grid infrastructure for storage, grid balancing, interconnection and supply purposes – to support clean technologies and facilitate the secure energy system envisioned, is acknowledged in NPS EN-1 and NPS EN-5, where:

- "The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security." (NPS EN-1, paragraph 3.3.66 / NPS EN-5, paragraph 1.1.1);
- "Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is high." (NPS EN-1, paragraph 3.3.32);

- “Interconnection across national borders has an essential role in delivering secure, low carbon electricity at low cost.” (NPS EN-1, paragraph 3.3.32); and
 - “The electricity network infrastructure to support the government’s offshore wind ambition is as important as the offshore wind generation infrastructure. Without the development of the necessary networks to carry offshore wind power to where it is needed in the UK, the offshore wind ambition cannot be achieved.” (NPS EN-5, paragraph 1.1.3).
- 4.1.1.5 Further, the recently appointed Labour Government has affirmed its commitment to clean, secure and reliable power by 2030, by granting several renewable energy DCOs since taking office in July 2024 and has pledged to establish ‘Great British Energy’ to drive forward clean energy production and investment.
- 4.1.1.6 This unequivocally justifies the need for Mooir Vannin OWF and that it aligns with market need and the government’s priorities. As a large-scale renewable energy project of proven technology, the Mooir Vannin OWF is essential in securing the delivery of the Government’s renewable energy strategy and achieving the legally binding emissions reduction targets. The Mooir Vannin OWF project will enhance energy security for the UK by diversifying sources of energy, increasing competition in energy markets and offering alternatives to consumers. The timely and consistent consenting of the necessary grid connection infrastructure, of which the Proposed Development forms an integral part, is critical to that delivery.

5 Comparison with other Nationally Significant Infrastructure Projects

- 5.1.1.1 The characterisation of the Proposed Development to be treated as an NSIP and request for a section 35 direction to support a broader energy project is normal course and aligns with the intent and purposes of the Planning Act 2008 to provide an efficient consenting pathway. The Proposed Development meets the qualifying tests in both the Planning Act and PINS’ advice, as set out below.
- 5.1.1.2 Amendments 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 MVOWFL 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;

The Proposed Development forms an essential part of the East Irish Sea Transmission Project (which itself forms part of the wider Mooir Vannin OWF Project), and will ultimately drive growth in the economy by enabling the Mooir Vannin OWF to store and supply clean energy to the grid. Mooir Vannin OWF Project would be a multi-billion pound project of which the East Irish Sea Transmission Project would be a significant part delivering investment to the local economy in the North-West of England, and more broadly to the UK. The EBI element alone could require more than £700m of investment.

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

The Proposed Development will be located onshore in England and with the associated transmission infrastructure of the East Irish Sea Transmission Project within the English REZ and English territorial waters (under the jurisdiction of the MMO) and likely across a number of LPAs depending on the transmission route once refined.

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

The Proposed Development forms part of the East Irish Sea Transmission Project as whole and Moir Vannin OWF which are large scale, complex and high value infrastructure works of a substantial size, as demonstrated via the parameters identified in **Section 1.2** above.

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

The Proposed Development is CNP infrastructure and is also critical to the delivery of Moir Vannin OWF.

(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."

The Proposed Development (including the necessary associated development) is of a very substantial size and is an integral part of a wider cross-border renewable energy project.

5.1.1.3 The Secretary of State has to date granted section 35 directions to several network NSIPs as follows:

- Xlinks Morocco to UK Power Project.
- Nautilus Interconnector;
- AQUIND Interconnector;
- Triton Knoll Electrical System;
- Eurolink Multipurpose Interconnector;
- Morven Offshore Wind Farm's transmission assets;
- Morgan and Morecambe Offshore Wind Farm's transmission assets; and
- Ossian Offshore Wind Farm's transmission assets.

5.1.1.4 These projects are similar in character to the East Irish Sea Transmission Project, in that each comprises an onshore substation with 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.

5.1.1.5 The Proposed Development is especially analogous to other interconnector projects such as Xlinks Morocco to UK Power and the Nautilus Interconnector, where the SoS granted section 35 directions for the part to be treated as NSIPs defined as the onshore converter stations in the UK, which convert and supply electricity to the UK grid as part of a broader renewable energy project. Moir Vannin OWF is also broadly similar to the Morven OWF and Ossian OWF projects, because those OWF projects

propose an array wholly in Scottish waters, but components of the grid connection are related infrastructure are in both Scotland and England. The components of the grid connection infrastructure in England were the subject of a successful grant of section 35 direction earlier this year.

- 5.1.1.6 The Planning Act 2008 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 the Proposed Development 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.

6 Streamlining benefits of the section 35 direction to ensure early delivery

6.1 Unified consenting process

- 6.1.1.1 A section 35 direction will bring MVOWFL certainty and unify an otherwise complex consenting pathway. In the absence of a section 35 direction, the Proposed Development would require multiple separate consents from different decision-makers: (a) the onshore works would require planning permissions from the relevant local planning authority or authorities; and (b) the offshore works would require marine licence(s) from the MMO.
- 6.1.1.2 This alternative, complex consenting position may lead to differences of approach being taken on the same works in the same location, delays and inconsistencies in the determination of the applications, the consents granted, and the rights that are secured. There is the potential for significant delays to the delivery of the East Irish Sea Transmission Project if the applications need to be determined by the Secretary of State following a public inquiry, which will in turn delay the delivery of the generation assets for Moir Vannin OWF in a climate where the UK urgently needs to meet its renewable energy targets and provide grid balancing services and security of supply.

6.2 Compulsory acquisition powers

- 6.2.1.1 In the event MVOWFL is unable to separately acquire any necessary land or rights by agreement directly with interest holders, MVOWFL is likely to seek to secure compulsory acquisition powers typically included in a DCO required to deliver the Proposed Development.
- 6.2.1.2 Without a section 35 direction, a 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.

6.3 Streamlined process

- 6.3.1.1 The Planning Act 2008 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 and commitment to net zero.

6.4 Local Planning Authorities

6.4.1.1 As noted in **Section 3.1** above, MVOWFL has engaged with all LPAs within the indicative transmission boundary. The letters of support received from LPAs reflect positive engagement to date, and MVOWFL is committed to continue to work constructively with the relevant LPAs throughout the process, including as key stakeholders for any subsequent DCO application.

7 Conclusion

7.1.1.1 In summary, a section 35 direction is sought for the Proposed Development because it meets the legal tests and is of national significance for the following reasons:

- it comprises complex, co-ordinated and high value infrastructure works which will convert, supply (and store until consumption is required) compatible electricity to the national grid;
- 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;
- Government policy confirms that there is an urgent need for offshore wind farms and the infrastructure required to connect them to the grid, and encourages a coordinated approach to offshore wind transmission; and
- it will deliver much needed investment, energy security and employment to the UK.

7.1.1.2 There are major benefits to consenting the Proposed Development via the NSIP regime, where:

- the Energy NPSs can be given appropriate consideration and weight in the decision-making process; and
- the timetabling certainty will allow MVOWFL to plan the procurement and investment decisions and other activities needed to deliver Moir Vannin OWF.

Appendix A Letters of Support



Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle Upon Tyne
NE4 7YH

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Consent Project Manager
Moor Vannin Offshore Windfarm Ltd
The Old Courthouse
Athol Street
Douglas
Isle of Man

Our reference:
ENQ/20204/00082

By email only

12 September 2024

Dear REDACTED

Moor Vannin Offshore Windfarm

The Marine Management Organisation (MMO) understands that your proposed route to consent for Moor Vannin Offshore Windfarm is via a Section 35 (s35) Direction under the Planning Act 2008 to be considered a Nationally Significant Infrastructure Project (NSIP). Being directed by the Secretary of State via s35 that the development is 'nationally significant' will enable the project to apply for Development Consent via the Planning Act 2008. The DCO will provide development consent for the assets together with a Deemed Marine Licence, thus covering both the onshore elements and the transmission assets in English waters.

The MMO agrees with this proposed route to consent and consider the risk of legal challenge decreases by following a single consenting pathway.

If you require any further information, please do not hesitate to contact me using the details provided below.

Yours sincerely,

REDACTED
Marine Licensing Case Manager

D +44 (0)
E @marinemanagement.org.uk



3rd September, 2024

Enquiries To:

Direct Line:

Email: @blackpool.gov.uk

Dear REDACTED,

Re: Ørsted Moor Vannin English Transmission Assets - Request for a Direction by Secretary of State under Section 35 of the Planning Act 2008

Thank you for advising the Local Planning Authority of your intention to submit a request to the Secretary of State for the Moor Vannin English Transmission Assets, located in England and in English waters, to be directed under Section 35 of the Planning Act 2008 (as amended) (the Act). It is understood that if the Direction is made then the project will be treated as an infrastructure proposal for which development consent is required.

Blackpool Council is supportive of the preferred consenting route and request to the Secretary of State for the project to be considered nationally significant and require development consent under the Act. Having been consulted on the scope of the proposal and the alternative routes to consent, Blackpool Council concurs that the proposal would be best considered through the NSIP regime.

Not only does the regime allow for a holistic approach to assessments and consultation across multiple consenting regimes, both within onshore and offshore jurisdictions, but it also offers a comprehensive framework for considering the proposals on a comparable basis to previously identified projects, which are either defined as nationally significant under the Act, or the Secretary of State has agreed should be considered of national significance for which development under the Act is required. Blackpool Council also notes that similar energy projects have been considered under the Act through Direction by Section 35 and the relevant local planning authorities will continue to be consulted on the scheme.

Please include this letter of support in your request to the Secretary of State for Energy Security and Net Zero.

Yours sincerely,

Head of Development Management

Communications and Regeneration

Development Management
PO Box 17, Municipal Buildings,
Corporation Street,
Blackpool, FY1 1LZ

Contact

T: (01253)

www.blackpool.gov.uk



Our Ref: 2024/00008/PREAPP

Date: 20 September 2024

Consultation Manager
UK Stakeholder Relations
Region Europe
Ørsted

Dear REDACTED

Ørsted
Moor Vannin English Transmission Assets
Request for a Direction by Secretary of State under Section 35 of the Planning Act 2008

Thank you for advising the Local Planning Authority of your intention to submit a request to the Secretary of State for the Moor Vannin English Transmission Assets, located in England and in English waters, to be directed under Section 35 of the Planning Act 2008 (as amended) (the Act). It is understood that if the Direction is made then the project will be treated as an infrastructure proposal for which development consent is required.

Chorley Council is supportive of the request to the Secretary of State for the project to be considered nationally significant and require development consent under the Act. Having been consulted on the scope of the proposal and the alternative routes to consent, Chorley Council concurs that the proposal would be best considered through the NSIP regime.

Not only does the regime allow for a holistic approach to assessments and consultation across multiple consenting regimes, both within onshore and offshore jurisdictions, but it also offers a comprehensive framework for considering the proposals on a comparable basis to previously identified projects, which are either defined as nationally significant under the Act, or the Secretary of State has agreed should be considered of national significance for which development under the Act is required. Chorley Council also notes that similar energy projects have been considered under the Act through Direction by Section 35 and the relevant local planning authorities will continue to be consulted on the scheme.

Please include this letter of support in your request to the Secretary of State for Energy Security and Net Zero.

Your sincerely

Chief Planning Officer
Chorley Council

Oliver Morgan

From: [REDACTED]
Sent: 13 September 2024 10:00
To:
Cc: RE: Ørsted - Mooir Vannin Transmission Infrastructure
Subject:

INTERNAL

INTERNAL

Good afternoon REDACTED,

Thanks you for your patience in awaiting my reply.

This matter has been under discussion with senior management, and I can advise that at this stage we have no objection to the process suggested.

Kind Regards

Senior Planning Officer

[REDACTED]
Preston City Council

From: [REDACTED]
Sent: Monday, September 9, 2024 10:03 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Ørsted - Mooir Vannin Transmission Infrastructure

INTERNAL

Hi REDACTED,

REDACTED is on leave this week so I'm just following up on our request for a letter of support from the Council.

We are looking to finalise our s35 submission to DESNZ so would be grateful to receive the letter to accompany our application.

If you have any queries, please do get in touch with me.

Many thanks,

REDACTED

Moor Offshore Wind Farm Limited
Orsted
The Old Courthouse
Athol Street
Douglas
Isle of Man
IM1 1LD

Senior Planning Officer
Sefton Council
Magdalen House
30 Trinity Road
Bootle L20 3NJ

Telephone: 0345
Email: @sefton.gov.uk
Date: 12th August 2024
Our Ref: DC/2024/00770

Dear REDACTED

**Various Proposed Sites for Moor Vannin Offshore Wind Farm, Isle of Man
Pre-application enquiry for site selection for a proposed offshore wind farm prior to an
application to the Secretary of State via Section 35 of the Planning Act 2008 (as amended).
Some sites under consideration coincides with Sefton's boundary.**

Thank you for your correspondence which advises the Local Planning Authority of your intention to submit a request to the Secretary of State to seek confirmation that the project is a Nationally Significant Infrastructure Project (NSIP) for which development consent is required.

Sefton Council is supportive of the proposal being considered a NSIP, as per the Town and Country Planning Act 2008 (as amended). Sefton Council considers that the proposal would be best considered through the development consent (DCO) process, noting that similar projects have been considered under such legislation.

Sefton Council looks forward to assisting you with the DCO process where possible, whilst supporting the delivery of any community benefits which will be derived from this project.

Yours sincerely

REDACTED
Senior Planning Officer

Date: 9 September 2024

Your ref: Our ref: PREAPP/24/00042

E Mail: @southribble.gov.uk

Extension: Direct Dial Tel: 01772



Civic Centre
West Paddock
Leyland
Lancashire
PR25 1DH

01772 625625
southribble.gov.uk

Dear REDACTED,

**Proposal: Ørsted Moir Vannin English Transmission Assets
Request for a Direction by Secretary of State under Section 35 of the Planning Act 2008**

Thank you for advising the Local Planning Authority of your intention to submit a request to the Secretary of State for the Moir Vannin English Transmission Assets, located in England and in English waters, to be directed under Section 35 of the Planning Act 2008 (as amended) (the Act). It is understood that if the Direction is made then the project will be treated as an infrastructure proposal for which development consent is required.

South Ribble Borough Council is supportive of the preferred consenting route and request to the Secretary of State for the project to be considered nationally significant and require development consent under the Act. Having been consulted on the scope of the proposal and the alternative routes to consent, South Ribble Borough Council concurs that the proposal would be best considered through the NSIP regime.

Not only does the regime allow for a holistic approach to assessments and consultation across multiple consenting regimes, both within onshore and offshore jurisdictions, but it also offers a comprehensive framework for considering the proposals on a comparable basis to previously identified projects, which are either defined as nationally significant under the Act, or the Secretary of State has agreed should be considered of national significance for which development under the Act is required. South Ribble Borough Council also notes that similar energy projects have been considered under the Act through Direction by Section 35 and the relevant local planning authorities will continue to be consulted on the scheme.

Please include this letter of support in your request to the Secretary of State for Energy Security and Net Zero.

Yours sincerely,

REDACTED
Head of Planning and Enforcement

Together we make a difference....

Ørsted
Moor Vannin English Transmission Assets
5 Howick Place
London
SW1P 1WG

Ask for:
Email: @wyre.gov.uk
Telephone number: 01253
Date: 12 September 2024
Ref: 24/00342/PREAPP

Dear REDACTED

Request for a Direction by Secretary of State under Section 35 of the Planning Act 2008

Thank you for advising the Local Planning Authority of your intention to submit a request to the Secretary of State for the Moor Vannin English Transmission Assets, located in England and in English waters, to be directed under Section 35 of the Planning Act 2008 (as amended) (the Act). It is understood that if the Direction is made then the project will be treated as an infrastructure proposal for which development consent is required.

Wyre Council is supportive of the preferred consenting route and request to the Secretary of State for the project to be considered nationally significant and require development consent under the Act. Having been consulted on the scope of the proposal and the alternative routes to consent, Wyre Council concurs that the proposal would be best considered through the NSIP regime.

Not only does the regime allow for a holistic approach to assessments and consultation across multiple consenting regimes, both within onshore and offshore jurisdictions, but it also offers a comprehensive framework for considering the proposals on a comparable basis to previously identified projects, which are either defined as nationally significant under the Act, or the Secretary of State has agreed should be considered of national significance for which development under the Act is required. Wyre Council also notes that similar energy projects have been considered under the Act through Direction by Section 35 and the relevant local planning authorities will continue to be consulted on the scheme.

Please include this letter of support in your request to the Secretary of State for Energy Security and Net Zero.

Yours sincerely

REDACTED
Principal Planning Officer

Ørsted