

## Evans, Rebecca

**From:** Bruce, George [REDACTED] >  
**Sent:** 27 August 2024 19:22  
**To:** Morgan Offshore Wind Project  
**Cc:** Innes, Colin; Brenstrum, Anna  
**Subject:** Attendance at ISH1 on behalf of (1) Barrow Offshore Wind Limited (2) Burbo Extension Ltd (3) Walney Extension Limited (4) Morecambe Wind Limited (5) Walney (UK) Offshore Windfarms Limited (6) Ørsted Burbo (UK) Limited [SWLLP-LEGALDIV.FID4727116]  
**Categories:** Deadline

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Good evening,

**Application by Morgan Offshore Wind Limited for an Order Granting Development Consent for the Morgan Offshore Wind Farm;  
Attendance at ISH1 on behalf of (1) Barrow Offshore Wind Limited (Ref: 20049595) (2) Burbo Extension Ltd (Ref: 20049590) (3) Walney Extension Limited (Ref: 20048542) (4) Morecambe Wind Limited (Ref: 20049596) (5) Walney (UK) Offshore Windfarms Limited (Ref: 20049592) (6) Ørsted Burbo (UK) Limited (Ref: 20049589)**

I write following our completion of the "EN010136 - Event Participation Form" as it relates to Issue Specific Hearing 1 ("ISH1") for the above Development Consent Order Examination.

I note that the form did not require that attendees set out the agenda items against which they wish to speak for ISH1. In case of use for the Examining Authority, I have set out below the agenda items where we would like to contribute and the background to our attendance. For completeness, I have also restated the relevant Examination Library documents which were provided in the form.

### Background

We represent the above Interested Parties (who for convenience we refer to as the "Ørsted IPs") who are taking part in on-going discussions with the developers of Morgan Offshore Wind Limited ("MOWL") regarding the issues raised in their Relevant Representations and pre-application consultation letters.

The Ørsted IPs wish to continue this dialogue which they hope may adequately address their concerns and remove the need for their attendance at Examination Hearings. However, until and unless they are addressed, and where no agreement can be reached outside of the Examination process, the Ørsted IPs require to take part in the above Examination and wish therefore to register their attendance via MS Teams at the following upcoming hearing in relation to the below agenda items. On the basis of on-going discussion of these issues, the Ørsted IPs intend their representations at this stage to be limited.

Should any or all of the Ørsted IPs no longer require to attend ISH1 or should the issues on which it is seeking to make representations change on the basis of on-going discussion with the developers of MOWL, we will be in touch to confirm this as soon as possible.

### Agenda Items

Hearing	Agenda Items	Points Ørsted IPs wish to make	Relevant Examination Library Documents
Issue Specific Hearing 1 10 September (pm)	Item 6	This agenda item refers to "Review of Relevant Representations". The Ørsted IPs believe it may be of assistance to set out its concerns as highlighted in its six Relevant Representations ("RRs").  <b>Shipping and Navigation:</b> The Ørsted IPs note that the agenda item makes specific reference to	<b>Application Documents relevant to the Ørsted IP's Issues</b> <ul style="list-style-type: none"><li>APP-025 (F2.7 Environmental Statement - Volume 2, Chapter 7: Shipping and Navigation)</li></ul>

	<p>“Shipping and Navigation” which the Ørsted IPs have highlighted as a concern in relation to (3) Walney Extension Limited and (4) Morecambe Wind Limited (see Issue Two within the Relevant Representations for each). In brief, the ES (F4.7.1/F2.7) conveys a change in risk related to both of these developments and we therefore require to be involved in engagement with MOWF to ensure that the risk is appropriately mitigated and our consents, agreements, and operations are not adversely affected by MOWF.</p> <p><b>Other Issues:</b> To the extent that the ExA wishes to discuss the Ørsted IP’s other issues raised in its RRs, we would be content to make submissions on the following Issues which have been raised by Ørsted IPs:</p> <ul style="list-style-type: none"> <li>• <b>Environmental concerns:</b> we are seeking engagement with MOWF to discuss a number of environmental concerns relating to ornithology and the cumulative impact assessment. We are not convinced that assessments are robust and we require to analyse this further and engage with MOWF.</li> <li>• <b>Wake loss:</b> We believe that MOWF will adversely affect the energy yield of each of the Ørsted IPs. This requires to be properly assessed by MOWF and appropriately mitigated / compensated.</li> <li>• <b>Radar:</b> (2) Burbo Extension Ltd (Ref: 20049590) and (3) Walney Extension Limited (Ref: 20048542) are implementing appropriate mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar. We require assurance that MOWF will not adversely affect or increase the cost of such mitigation, and that, in the event that MOWF makes use of this mitigation, MOWF will contribute to the purchase, installation and maintenance costs.</li> </ul>	<ul style="list-style-type: none"> <li>• APP-015 (F2.11 Environmental Statement - Volume 2, Chapter 11 Aviation and Radar)</li> <li>• APP-027 (F4.1 Environmental Statement - Volume 2, Chapter 9: Other Sea Users)</li> <li>• APP-060 (F4.7.1 Environmental Statement – Volume 4, Annex 7.1 Navigational Risk Assessment)</li> </ul> <p><b>Relevant Representations by the Ørsted IPs</b></p> <ol style="list-style-type: none"> <li>(1) Barrow Offshore Wind Limited: <b>RR-005</b></li> <li>(2) Burbo Extension Ltd: <b>RR-007</b></li> <li>(3) Walney Extension Limited: <b>RR-043</b></li> <li>(4) Morecambe Wind Limited: <b>RR-023</b></li> <li>(5) Walney (UK) Offshore Windfarms Limited: <b>RR-044</b>;</li> <li>(6) Ørsted Burbo (UK) Limited: <b>RR-032</b>.</li> </ol>
Other agenda items	<p>The Ørsted IPs are happy to make submissions, to the extent useful to the ExA, on other agenda items where they overlap with the above-mentioned Issues.</p> <p>Particularly, we note that the Shipping and Navigation concerns above may be relevant to the discussion of the “Interrelationship with other projects” (<b>Agenda Item 5</b>) where we would be happy to set out these concerns.</p>	N/A

Yours faithfully,

**George Bruce** (he/him)  
**Solicitor | Planning & Environment**  
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