

Department for Energy Security and Net Zero  
55 Whitehall  
London SW1A 2HP

20 September 2024

By Email Only:

Dear REDACTED

## East Irish Sea Transmission Project

### Qualifying request for section 35 direction under the Planning Act 2008

We write to request the grant of a section 35 direction under the Planning Act 2008 for the transmission infrastructure located within England and English waters which are required to connect the Mooir Vannin Offshore Wind Farm (array located in the Isle of Man) to the National Grid at Penwortham, England.

Mooir Vannin Offshore Wind Farm Limited (Company Registration Number: 013051V) (**MVOWFL**), a wholly owned subsidiary of Ørsted A/S, is developing the Mooir Vannin Offshore Wind Farm (**Mooir Vannin OWF**). The Mooir Vannin OWF is a proposed fixed-foundation offshore wind farm with an indicative capacity of c. 1.4 GW. It will be the first in the Isle of Man's territorial waters. It is expected to comprise an offshore array of up to 100 wind turbines wholly in the Isle of Man's jurisdiction, and transmission infrastructure that will export the renewable energy generated to the Isle of Man and to England. MVOWFL has secured a grid connection agreement with the National Grid Electricity System Operator for the proposed connection into the Penwortham Substation for the connection to England. An indicative plan showing the extent of the Mooir Vannin offshore array and transmission boundary for the English connection is attached as **Figure 1**.

MVOWFL's consenting strategy includes seeking:

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 infrastructure 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 under the Planning Act 2008 for:
  - (a) an Onshore Substation (**OnSS**), which will be a High Voltage Alternating Current (**HVAC**) system or High Voltage Direct Current (**HVDC**) system; and
  - (b) Electricity Balancing Infrastructure (**EBI**) which may include a Battery Energy Storage System (**BESS**), Long Duration Energy Storage (**LDES**) and/or conversion to other energy carriers such as **P2X** (e.g. hydrogen),

both located in England and together comprising "the **Proposed Development**", which are essential components of the infrastructure located in England and English waters required to connect Mooir Vannin OWF to the Penwortham Substation in England and provide grid balancing services to the national grid, together with associated development including

offshore booster station(s), offshore and onshore cabling forming part of the wider East Irish Sea Transmission Project. Other consents and licences may be required in relation to the project and these would be obtained in due course.

It is the assets comprising the Proposed Development (described in detail in the Supporting Statement) that are the subject of this request for the Secretary of State to exercise the power under section 35 of the Planning Act 2008, to direct to be treated as development for which development consent is required. The necessary consents for the Proposed Development 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.

The case for granting the direction is compelling. Firstly, the project satisfies the statutory legal tests, where, in accordance with section 35, the Proposed Development:

- Forms part of a proposed project within one of the qualifying infrastructure fields (energy), being the Moir Vannin OWF and East Irish Sea Transmission Project (section 35(2)(a)(i));
- Will be located in England, English territorial waters and in the English part of the renewable energy zone (sections 35(2)(b) and 35(3)); and
- Will be in itself of national significance for the reasons specified in the accompanying written qualifying request (Supporting Statement) (section 35(2)(c)).

Further, the policy justification for a section 35 direction for the Proposed Development is strong. As set out in detail in the enclosed Supporting Statement, the suite of National Policy Statements (**NPS**) supporting the Planning Act 2008 state that there is a critical national priority for the provision of nationally significant low carbon infrastructure. For the purposes of NPS EN-1, low carbon infrastructure expressly includes offshore wind projects, electricity grid infrastructure and transmission assets. The Proposed Development is therefore of national significance because it comprises an onshore substation which converts electricity generated from Moir Vannin OWF to Great Britain's national grid plus energy balancing infrastructure which is capable of providing a meaningful contribution to security of supply in the UK. The Proposed Development and its associated development including offshore and onshore cabling is also essential in assisting the UK Government deliver its renewable energy strategy and achieve its legally binding emission reduction targets by delivering renewable power to the grid. The timely and streamlined consenting of the Proposed Development and its associated development will contribute to the urgent decarbonisation of Great Britain's national grid.

In conclusion, the section 35 direction is sought for the Proposed Development to be recognised as nationally significant infrastructure for which development consent is required, thereby making the unified consenting pathway under the Planning Act 2008 available. It would enable the effects, impacts and benefits of the Proposed Development to be assessed in a streamlined and consistent manner with all stakeholders engaged under the development consent regime, and ultimately contribute to the deployment of urgent renewable energy to Great Britain's national grid.

Please contact us on the details below if you require any further information or would otherwise like to discuss.

Yours sincerely

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