



Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Statement of Common Ground with Historic England

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Contents

1	Introduction	9
1.1	Overview of the Project.....	9
1.2	Purpose of this document	9
1.2.1	Consultation with Historic England.....	10
1.2.2	Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters.....	11
2	Statement of Common Ground.....	12
2.1	Marine Archaeology and Cultural Heritage	12
3	Signatures	17
4	References	18

Tables

Table 1.1 Topics included in the SoCG	10
Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters	11
Table 2.1 Summary of consultation with the HE	12
Table 2.2 Topics agreed, in discussion or not agreed with HE in relation to marine archaeology and cultural heritage.....	14

Glossary of Acronyms

DCO	Development Consent Order
DML	Deemed Marine Licence
ES	Environmental Statement
FLO	Fisheries Liaison Officer
HE	Historic England
NFFO	National Federation of Fishermen's Organisations
NRW	Natural Resource Wales
OSP	Offshore substation platform
RIAA	Report to Inform Appropriate Assessment
SoCG	Statement of Common Ground
UK	United Kingdom
WTG	Wind turbine generator

Glossary of Unit Terms

km ²	square kilometre
MW	Megawatts

Glossary of Terminology

Agreement for Lease (Afl)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.



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1 Introduction

1.1 Overview of the Project

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The windfarm was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the windfarm was received in 2023.
3. The AfL comprises an area of up to 125km² and reflects the windfarm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km².
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSP(s)), and possible platform link cables to connect OSP(s)).
5. A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

1.2 Purpose of this document

6. This Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from Historic England. This identifies topic areas where there is agreement, areas of disagreement, and areas which remain under discussion in relation to the Development Consent Order (DCO) application for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this SoCG.
8. This SoCG has been structured to reflect topics of the Application which are of interest to Historic England. Historic England (retaining the formal title of the Historic Buildings and Monuments Commission for England) is the government service championing England's heritage and giving expert, constructive advice.

9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and Historic England to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
10. Throughout the SoCG the phrase 'Agreed' identifies any point of agreement between the Applicant and Historic England. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and Historic England.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to HE.

Table 1.1 Topics included in the SoCG

Topic/chapter	Applicant reference
Draft Development Consent Order	3.1
Chapter 15 - Marine Archaeology and Cultural Heritage	5.1.15
Outline Offshore Written Scheme of Investigation	6.10
In Principle Monitoring Plan	6.4
Consultation Report and appendices	4.1
Historic England Relevant Representation	REP1-095 ¹

1.2.1 Consultation with Historic England

1.2.1.1 Pre-Application

12. The Applicant has engaged with Historic England on the Project during the pre-Application process, both in terms of informal non-statutory engagement and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
13. Historic England provided comments on the PEIR on 30th May 2023 as part of the statutory consultation process.
14. Further to this, numerous meetings were held with Historic England through the Evidence Plan Process (EPP) and also through regular update meetings. Historic England were only involved in the Historic Environment Expert Topic Groups (ETGs). These are detailed throughout the SoCG, and minutes of the

¹ PINS Reference

ETG meetings are provided as Appendices to the Consultation Report (APP-016).

15. For further information on the consultation process please see the Consultation Report (REP1-002).

1.2.1.2 Post-Application

16. The Applicant is committed to further engagement with Historic England as described in **Table 2.1**.
17. Historic England provided a Relevant Representation (RR) on 19th August 2024 and a Written Representation at Deadline 1 (REP1-095) on 26th November 2024 that has been used to populate this SoCG.

1.2.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

18. In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or ‘in discussion’, the colour coding system set out in **Table 1.2** has been used.
19. Details on specific matters that are ‘Agreed’, ‘Not Agreed’ or ‘In Discussion’ are presented in **Table 2.2**.

Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

Position status	Position colour coding
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the HE is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG.	Not Agreed – no material impact
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the HE is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
In Discussion The matter is neither ‘agreed’ nor ‘not agreed’ and is a matter where further discussion is required between the parties	In Discussion

2 Statement of Common Ground

20. A summary of the consultation undertaken to date with Historic England and the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and Historic England during the pre-application phase) are set out below for each of the SoCG topic areas.

2.1 Marine Archaeology and Cultural Heritage

21. **Table 2.1** provides a summary of the consultation undertaken to date in relation to Marine Archaeology and Cultural Heritage. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with Historic England as informed by the consultation and information exchanged during the pre-application and examination phases of the Application.

Table 2.1 Summary of consultation with the HE

Date	Contact type	Owner	Topic
Pre-application			
23 November 2021	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project, indicative timelines and upcoming survey plan and methodology.
20 May 2022	Online meeting ETG1	Applicant	To discuss the EPP for the Project and share the Methodology and ToR.. The understanding of the baseline environment was shared for comment, as were potential impacts that were likely to be considered in the Scoping Report and the data sources used for the assessment
31 August 2022	Online meeting ETG 2	Applicant	Key comments on the Scoping Opinion were presented for discussion.. The initial coastal heritage setting assessment, study area and the approach to cumulative assessment were presented.
5 August 2022	Written submission	Applicant	Provision of Offshore Historic Environment ETG 1 Method Statement (FLO- MOR-MS-0004) to Historic England
2nd September 2022	Written submission	Historic England	Response to Offshore Historic Environment ETG 1 Method Statement from Historic England
28 September 2022	Online Meeting EPP Steering Group	Applicant	Feedback from completed ETG meetings / scoping RHDHV. Morgan OWF joined for the second part of the meeting. EPP Methodology and Terms of Reference discussed,.
14 November 2022	Online Meeting ETG 3	Applicant	The mitigation strategies were presented including the use of Archaeological Exclusion Zones (AEZ), and micro-siting to avoid potential heritage assets. Presented an update on geophysical analysis. Initial

Date	Contact type	Owner	Topic
			Findings of the Coastal Heritage Setting Assessment were shared. Projects and the study area of the cumulative assessment was shared. The approach and the initial findings of the historic seascape character were presented.
14 June 2023	Online Meeting ETG 4	Applicant	Project update with works completed since ETG 3 . Key comments from PEIR review by Historic England were shared. An update to the setting assessment was shared with assets identified for further assessment.
18 January 2024	Online Meeting ETG 5	Applicant	. Details of the archaeological mitigation measures were provided and a summary of the Phase 2 Geotechnical survey campaign. ES key findings were shared and discussions around the Outline Written Scheme of Investigation (WSI).
16 April 2024	Written submission	Applicant	Provision of a Stage 1 Geoarchaeological Assessment (MOR001-FLO-CON-ENV-TEC-0006) to Historic England
26 April 2024	Written submission	Historic England	Acknowledgment and acceptance of updated Archaeological Method Statement
Post-Application			
29 August 2024	Online Meeting	Applicant	Project update shared. Discussions on development of SoCG.
2 December 2024	Online Meeting	Applicant	Project update shared. Discussions on Written Representation and development of SoCG.
27 January 2025	Online Meeting	Applicant	Project update shared. Discussions on Written Representation and development of SoCG.

Table 2.2 Topics agreed, in discussion or not agreed with HE in relation to marine archaeology and cultural heritage

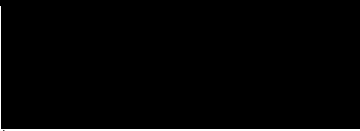
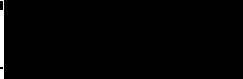
Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
Environmental Impact Assessment (EIA)				
HE 1	Consultation	Historic England has been adequately consulted on marine archaeology and cultural heritage matters to date.	Historic England have been consulted through the EPP process via the ETG and have provided substantive pre-application advice about the scope of the assessment.	Agreed
HE 2	Baseline environment	The ES adequately characterises the baseline environment in terms of offshore archaeology and cultural heritage as detailed in Section 15.5 of ES Chapter 15 Marine Archaeology and Cultural Heritage (APP-052). Specifically, the list of categories of key known and potential heritage assets, and the sources of data which inform the assessment, are suitable to characterise the baseline environment for the purposes of the impact assessment	We consider adequate and sufficient information has been presented in the Environmental Statement regarding heritage assets (i.e. maritime and aviation archaeology within Examination Document APP-052).	Agreed
HE 3	Survey data	Survey data has been collected to inform the assessment as presented within ES Chapter 15 Marine Archaeology and Cultural Heritage. The data acquired, and the analysis of this data, is suitable to characterise the baseline environment for the purposes of the impact assessment.	We acknowledge the work completed to corroborate desk-based sources of information with geophysical survey data acquired for this proposed project.	Agreed
HE 4	Risk of encountering presently unknown elements of the historic environment	The Applicant acknowledges the risk of encountering 'potential heritage assets' and has made appropriate provision for survey campaigns which will be designed and planned in reference to an agreed archaeological WSI, This will be agreed post-consent (in line with the Outline	We consider that sufficient attention has been given to determining risk of encountering known or presently unknown heritage assets.	Agreed

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
		Offshore WSI (APP-154)) to specify the methodological approaches to be followed to further qualify the nature of potential heritage assets with respect to the final design of the Project.		
HE 5	Designated heritage assets	As set out in Section 15.6.2.5 of ES Chapter 15 Offshore Marine Archaeology and Cultural Heritage (APP-052) sufficient information has been provided to demonstrate that, although the Project would be visible from the designated heritage assets along the coastline, its presence would not detract from their archaeological, historic, and architectural interest and there would be no change to the significance of these designated heritage assets due to changes in their setting.	We do not consider there to be any change in the significance of the identified designated heritage assets as related to changes in their setting.	Agreed
HE 6	Policy and legislation	The assessment is compliant with planning policy and legislation and the legislation, policy and guidance detailed in Section 15.4.1 of ES Chapter 15 Marine Archaeology and Cultural Heritage is relevant and in line with overarching National Policy Statement for Energy (EN-1) and National Policy Statement: Renewable Energy Infrastructure (EN-3).	Historic England have noted the attention given to policy and legislation such as EN-3.	Agreed
HE 7	Effects on marine archaeology and cultural heritage	The Applicant considers the effects assessed for marine archaeology and cultural heritage, including cumulative effects and drawing on the worst-case scenarios presented in Table 15.2, are appropriate and that the assessment methodology as presented in 15.4.3 of ES Chapter 15 Marine Archaeology and	We agree with the assessment conducted by the Applicant.	Agreed

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
		Cultural Heritage is adequate to assess the potential impacts of the project.		
Draft DCO - Outline Management Plans/ Mitigation and Monitoring				
HE 8	Approach to defining Archaeological Exclusion Zones (AEZs)	The nature and extent of AEZs will be finalised and agreed in consultation with Historic England prior to construction based upon the archaeological assessment of preconstruction data with regard to a refined design footprint and to any other information which may come to light.	Historic England concur with the use of AEZs and TAEZs as the primary mechanism for in-situ protection of materials of possible or known archaeological interest.	Agreed
HE 9	Approach to further investigation	The Outline Offshore WSI (APP-154) sets out an appropriate approach to further investigation, post-consent, which will inform the appropriate application of mitigation measures inclusive of in-situ avoidance.	Historic England concur with the approach to implementing investigation and mitigation as described in the Outline Offshore WSI (APP-154). We also concur with the process of consultation to take work forward through iterative WSIs, should consent be obtained and that the Outline Offshore WSI (APP-154) should be updated to produce a "final" WSI to be applied post-consent, should permission(s) be secured, in accordance with NPS EN-3.	Agreed
HE 10	In Principle Monitoring Plan (IPMP)	The IPMP effectively captures the relationship between the further development of the Project design and the delivery of further investigation and the application of mitigation measures, as detailed in the Outline Offshore WSI (APP-154).	We agree with the principal mechanism described in the IPMP (REP3-046) and the referenced Outline OWSI with any subsequent method statements to be subject to consultation with Historic England.	Agreed

3 Signatures

22. The above SoCG is agreed between the Historic England and the Applicant on the day specified below.

Signed:	
Print Name:	Christopher Pater
Job Title:	Head of Marine Planning
Date:	26 th March 2025
Duly authorised for and on behalf of Historic England	
Signed:	
Print Name:	Oliver Gardner
Job Title:	Consent Manager
Date:	26th March 2025
Duly authorised for an on behalf of the Applicant	

4 References

DESNZ (2024) Overarching National Policy Statement for Energy (EN-1)

DESNZ (2024) Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3)

IMO (2018). Revised Guidelines for Formal Safety Assessment (FSA) for use in the Rule Making Process MSC-MEPC.2/Circ.12/Rev.2.