



Maritime &  
Coastguard  
Agency

**Maritime and Coastguard Agency**  
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Southampton  
SO15 1EG

National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

[www.gov.uk/mca](http://www.gov.uk/mca)  
15 May 2025

Dear Sir/Madam

## **Morecambe and Morgan Offshore Wind Farms: Transmission Assets**

### **Deadline 1 – Written Representation**

The Maritime and Coastguard Agency (MCA) is an Executive Agency of the Department for Transport and is responsible throughout the UK for implementing and developing the UK Government's maritime safety and environmental protection policy. This includes co-ordinating maritime Search and Rescue (SAR) through His Majesty's Coastguard 24 hours a day, and checking that ships meet UK and international safety rules. The MCA works to prevent the loss of lives at the coast and at sea, to ensure that vessels are safe, and to prevent coastal pollution. The UK Technical Services Navigation Branch is responsible for UK radiocommunication and navigation policy. This primarily covers SOLAS Convention (Safety of Life at Sea Convention 1974, as amended) Chapters IV and V; the COLREG Convention (International Regulations for Preventing Collisions at Sea 1972, as amended); and the ITU Convention (International Telecommunications Convention 1932, as amended). The Navigation Risk Assessment (NRA), the Shipping and Navigation chapter of the Environmental Impact Report and the draft DCO have been reviewed and we would like to comment as follows:

#### **F2.7 Volume 2, Chapter 7: Shipping and Navigation (APP-056), F2.7.1 Volume 2, Annex 7.1: Navigation risk assessment – Part 1 of 2 (APP-057) and, F2.7.1 Volume 2, Annex 7.1: Navigation risk assessment – Part 2 of 2 (APP-058).**

The Applicant has undertaken a detailed Navigation Risk Assessment (NRA) in accordance with MCA guidance MGN (Marine Guidance Note) 654 and NRA risk assessment methodology. We are satisfied that appropriate traffic data has been collected in accordance with MGN654. This includes various sources of data including Automatic Identification System (AIS) data from 2019 and 2022. This has been supplemented by vessel traffic surveys for the generation assets assessment from 2021 to 2023. MCA is content that the traffic data collection is suitable for the assessment.

Key and appropriate stakeholders were identified, and the MCA is content that suitable consultation took place via a hazard identification workshop and dedicated meetings. A completed MGN 654 Checklist has been provided as part of the NRA, and we are content the recommended NRA methodology process has been followed.

We are content with the applied mitigations listed in Tables 1.10 and 1.37 which are reflected in the draft Development Consent Order, subject to some amendments (see below). We are content that the Hazard Log in Appendix A provides a reasonable assessment of the hazards and we note there are no unacceptable risks identified.

We are content with regards to the process undertaken for complying with the guidance in MGN 654 and its annexes, and we welcome the work to be undertaken for addressing the guidance and recommendations in the future.

### **Cable Routes and Cable Protection**

It is noted in the Project Description (APP-024) that High Voltage Alternate Current (HVAC) equipment will be used and there will not be an offshore substation. HVDC cables are not expected to have an impact on electro-magnetic fields and ships' magnetic compasses.

We note that the cables are expected to be buried and any consented cable protection works must ensure existing and future safe navigation is not compromised. If cable protection measures are required e.g., rock bags or concrete mattresses, the MCA would accept a maximum of 5% reduction in surrounding depth referenced to Chart Datum. This will be particularly relevant where depths are decreasing towards shore and potential impacts on navigable water increase.

### **Safety Zones**

There is no mechanism for applying for safety zones around cables or cable laying vessels in the UK. The applicant has suggested they will develop a process for managing and communicating the use of 'advisory exclusion zones' in the post-consent stage (APP-240 J33 Safety Zone Statement). MCA would like to clarify that the International Regulations for Preventing Collisions at Sea (IRPCS or Collision Regulations) apply to all vessels at sea and accordingly, vessels must remain a safe distance from the cable laying vessel. The applicant may request third party vessels remain a specified distance from the cable laying vessel, which can be promulgated via their local notifications to mariners, however there is no legal basis for enforcement unless there is an infringement of the Collision Regulations.

### **Unexploded Ordnance (UXO) Clearance**

HM Coastguard (HMCG) must be notified at least seven days in advance of any proposed UXO clearance works, in this case to [zone32@hmcg.gov.uk](mailto:zone32@hmcg.gov.uk) and [zone33@hmcg.gov.uk](mailto:zone33@hmcg.gov.uk) and to include emergency contact information for the vessel and the expected timescale of operation. Verbal communication should be made directly with HMCG at the start of the UXO works, and again to notify the end of the clearance. This can be established either using the appropriate radio channels/frequencies or via telephone in this case to Holyhead MRCC on 01407 762051.

### **Wreck Material (advisory note)**

The applicant is reminded of their legal obligation, under part 9 of the Merchant Shipping Act 1995, to report all recoveries of wreck material to the Receiver of Wreck. This must be done within 28 days of recovery. Failure to report the recovery of wreck material to the Receiver is a criminal offence. Additional information and a report of wreck and salvage form can be found at [www.gov.uk/guidance/wreck-and-salvage-law](http://www.gov.uk/guidance/wreck-and-salvage-law).

### **Emergency Response and Search and Rescue**

As there will be no permanent surface piercing structures as part of the transmission assets a completed SAR Checklist and a full Emergency Response Co-operation Plan (ERCoP) are not required. A Marine Emergency Action Card (MEAC) is considered appropriate for this project.

## **Post Construction Surveys**

We will expect a post lay cable burial survey to be carried out to confirm where the target depths have or have not been met. Any locations where the cable remains as either surface laid or shallow buried should be reassessed, considering the traffic levels and types of vessel activity in that area as further risk mitigation may be required, such as an anchor penetration study. This should be discussed further once the final installation techniques have been identified, with relevant navigation stakeholders.

We will expect a hydrographic survey of the export cable route in accordance with MGN 654 Annex 4 supporting document titled 'Hydrographic Guidelines for Offshore Developers', available on our website: <https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping>. We would like to highlight the need to provide the data in either GSF or CARIS format and that Total Vertical and Horizontal Uncertainty (TVU & THU) calculations are provided.

## **C1 Draft Development Consent Order including Deemed Marine Licences (APP-005)**

We would like to request the following amendments in the Deemed Marine Licences as follows:

### Schedule 14 Part 1

1(4)(f) – MCA contact details in should be amended to:

*Maritime and Coastguard Agency  
UK Technical Services Navigation  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG  
Email: [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)*

### Schedule 14 Part 2

- 14(9) – replace “regular intervals” with “weekly intervals”. This was requested at the PEIR stage.
- 24(4)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)”.
- 26(3)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “and side scan sonar, of the area(s)”.
- 28(1) – the close out report must be submitted within three months of the date of completion. This was requested at the PEIR stage.

### Schedule 15 Part 1

1(4)(f) – MCA contact details in should be amended to:

*Maritime and Coastguard Agency  
UK Technical Services Navigation  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG  
Email: [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)*

### Schedule 15 Part 2

- 14(9) – replace “regular intervals” with “weekly intervals”.

- 24(4)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “*and side scan sonar, of the area(s)*”.
- 26(3)(a) – side scan sonar data is not necessary for the bathymetry survey, therefore suggest removing “*and side scan sonar, of the area(s)*”.
- 28(1) – the close out report must be submitted within three months of the date of completion.

#### Schedule 16 Part 1

1(4)(e) – MCA contact details in should be amended to:

*Maritime and Coastguard Agency  
UK Technical Services Navigation  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG  
Email: [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)*

#### Schedule 16 Part 2

- 14(8) – replace “*regular intervals*” with “*weekly intervals*”.
- 18(1) – the close out report must be submitted within three months of the date of completion.

#### Schedule 17 Part 1

1(4)(e) – MCA contact details in should be amended to:

*Maritime and Coastguard Agency  
UK Technical Services Navigation  
Spring Place  
105 Commercial Road  
Southampton  
SO15 1EG  
Email: [navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)*

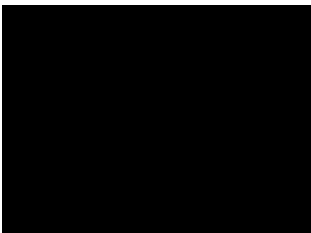
#### Schedule 17 Part 2

- 14(8) – replace “*regular intervals*” with “*weekly intervals*”.
- 18(1) – the close out report must be submitted within three months of the date of completion.

### **Conclusion**

The comments detailed above are considered appropriate and necessary for the safety of navigation and Search and Rescue purposes. We hope you find them useful at this stage and MCA is happy to discuss further as the project progresses.

Yours faithfully,



Offshore Renewables Lead  
UK Technical Services Navigation