

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Historic England SoCG F01



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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Development Consent Order (DCO)	An order made under the Planning Act 2008, as amended, granting development consent.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008

Term	Meaning
	allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Ltd is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds. Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan Offshore Wind Project: Generation Asset	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy Investments Ltd. and Energie Baden-Württemberg AG (EnBW).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Meaning
AHEF	Archaeology and Heritage Engagement Forum
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
ExA	Examining Authority
ES	Environmental Statement
HE	Historic England
kV	Kilovolt
OWL	Offshore Wind Limited
PEIR	Preliminary Environmental Information Report

Acronym	Meaning
SoCG	Statement of Common Ground

1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Historic England

1.1 Introduction

1.1.1 Overview

1.1.1.1 This initial Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (hereafter referred to as ‘the Applicants’) and Historic England, together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’).

1.1.1.2 The need for a SoCG between the Applicants and Historic England is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025 (PD-006).

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Transmission Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-006).

1.1.2 Transmission Assets elements under Historic England’s remit

1.1.2.1 All elements of the Transmission Assets which may affect the interests of Historic England, covering the offshore, intertidal and onshore works. These are detailed in Schedule 2A (Authorised Project), Part 1 (Authorised Development) and in Schedule 2B (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004) and in Schedules 14 and 15 of the deemed marine licences in the Draft DCO (AS-004).

1.1.2.2 This SoCG covers the following topics of relevance to Historic England:

- Historic environment
- Marine Archaeology and Heritage

1.1.3 Overview of Transmission Assets

1.1.3.1 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own

separate set of transmission assets (e.g., cable and substation infrastructure). However, the location of the infrastructure will be aligned (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to environment and the community.

1.1.3.2 Morgan OWL and Morecambe OWL (the Applicants), are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.

1.1.3.3 The key components of the Transmission Assets include the following.

- Offshore elements:
 - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
- Landfall:
 - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
- Onshore elements:
 - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
 - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
 - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
 - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
 - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phases of the Transmission Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by Historic England within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan

Process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Historic England during the post-application phase (i.e. relevant representations, pre-examination meetings, the written representation and any subsequent engagement through the Examination including any relevant questions from the Examining Authority).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Transmission Assets. The agreement logs present the position reached on 20 May 2025 (Deadline 1).

1.2.2 Summary of those matters agreed, ongoing points of discussion and not agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of those matters agreed, ongoing points of discussion and not agreed

Topic	Agreement status
Historic Environment	Ongoing point of discussion
Marine Archaeology and Cultural Heritage	Ongoing point of discussion

1.3 Summary of Consultation

1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicants with Historic England during the pre-application phases of the Transmission Assets.

1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicants with Historic England during the post-application phases of the Transmission Assets.

1.3.1.3 The consultation presented is not exhaustive but provides an indication of aspects of key discussions undertaken. All attendees at the meetings listed in

Table 1.2 are provided in the Technical Engagement Plan (APP-189) and Consultation Report (APP-170), however for the avoidance of doubt, this SoCG is limited to matters between Historic England and the Applicants.

1.3.1.4

This initial SoCG makes reference to other documents submitted with the Transmission Assets applications that set out, in greater detail, the discussions that have taken place between Historic England and the Applicants. These documents are:

- The Technical Engagement Plan (APP-041) and appendices (APP-190, APP-191 and APP-192)
- The Consultation Report (APP-170) and annexes (APP-187 and APP-188)
- Historic England's Relevant Representation (RR-839)
- The Applicants' response to Historic England's Relevant Representation at the Procedural Deadline within The Applicant's Response to Relevant Representations Part 2 – Affected parties and statutory consultees (PDA-007).

Table 1.2: Summary of pre-application consultation with Historic England

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
8 December 2022	Scoping Opinion	Statutory engagement	<p>Specific comments raised by HE related to:</p> <ul style="list-style-type: none"> • Lack of attention to seascape • Further locations for PEIR assessment • Risk mitigation for archaeological contamination • 500m buffer zone for archaeological study zone recommended • Specialist assessment recommended for potential prehistoric activity
Section 42 Consultation			
23 November 2023	Section 42 Statutory Consultation Response	Statutory engagement	<p>Specific comments raised by HE related to:</p> <ul style="list-style-type: none"> • Summary of baseline findings, surveys and desk-based resources • Assessment methodology and Maximum Design Scenario • Assessment of effects • Commitments, mitigation and monitoring • Pre-construction surveys and site preparation activities
Transmission Assets Evidence Plan Steering Group			

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
10 January 2023	Meeting 1	Non-statutory engagement	<ul style="list-style-type: none"> Introduction to the Transmission Assets and the projects programme and key milestones. Discussions of the Pre-Application and Evidence Plan Processes and overview of the Evidence Plan Steering groups and Expert Working groups
11 May 2023	Meeting 2	Non-statutory engagement	<ul style="list-style-type: none"> Discussion of the timeline of activities and offshore site selection process including the key restraints, offshore cable route selection and landfall providing the final offshore cable corridor prior to PEIR. Interaction with the key designated sites were presented alongside mitigation options and The Crown Estate Export Cable Route Assessment (ECRA).
16 July 2024	Meeting 3	Non-Statutory engagement	<ul style="list-style-type: none"> Project updates and route planning and site selection refinements made to the project post PEIR. Survey updates were presented alongside the commitments register and Evidence Plan Process.
Evidence Plan Process, (Onshore) Historic Environment EWG			
18 January 2023	Historic Environment EWG 01	Non-statutory engagement	Matters discussed included introduction of the Transmission Assets, project milestones, overview of EWG and EPP, and an agreement of the study area buffer being 500m, geoarchaeological deposit modelling with topographical surveys.
9 August 2023	Historic Environment EWG 02	Non-statutory engagement	Matters discussed included site selection, non-statutory consultation, project programme update and assessment update
8 February 2024	Historic Environment EWG 03	Non-statutory engagement	Matters discussed included site selection update, agreement log review, Section 42 responses, survey update, commitments and mitigation measures.
24 September 2024	Design Principles and Landscape management meeting	Non-statutory engagement	Matters discussed include outlining design process, landscape strategy update
20 August 2024	Historic Environment EWG04/ AHEF meeting 3	Non-statutory engagement	Presentation of project updates and further refinements post-PEIR, a recap of the geophysical and geotechnical surveys undertaken, and an overview of the archaeological impacts assessed within the ES.
(Offshore) Marine Archaeology and Heritage Engagement Forum (AHEF)			

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
05 June 2023	AHEF meeting 1	Non-statutory engagement	Matters discussed included an introduction of the Transmission Assets, project milestones baseline and data analysis to be contained within the PEIR. Finally, the approach to assessment for Marine Archaeology was presented.
29 February 2024	AHEF meeting 2	Non-statutory engagement	Matters discussed included project updates and refinements, S42 responses relevant to Marine Archaeology.
20 August 2024	AHEF meeting 3	Non-statutory engagement	Presentation of project updates and further refinements post-PEIR, a recap of the geophysical and geotechnical surveys undertaken, and an overview of the archaeological impacts assessed within the ES.

Table 1.3: Summary of post-application consultation with Historic England

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
14 May 2025	Meeting	Non-statutory engagement	To discuss SoCG

1.4 Agreement log

- 1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material
Not agreed	The matter is not considered to be agreed between the parties.

- 1.4.1.2 Table 1.5 to Table 1.6 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2).

1.4.2 Historic Environment

Table 1.5: Agreement Log between the parties on Historic Environment

Reference Number	Discussion point	Applicants' position	Historic England's position	Status
HE.HE.1	Consultation	The Applicants have undertaken adequate consultation with the HE on potential impacts on historic environment	Historic England will engage with the Applicant on the SoCG for its next submission at Deadline 3 once it has submitted its Written Representation at Deadline 1.	Ongoing point of discussion
HE.HE.2	Consultation	The Application documents have had due regard to matters raised by HE via statutory and non-statutory consultation activities in relation to historic environment		Ongoing point of discussion
HE.HE.3	Study Area	The EIA study area is appropriate for the impacts and receptors assessed.		Ongoing point of discussion
HE.HE.4	Surveys	The survey approach is appropriate for the site, impacts and receptors assessed. The site-specific surveys have been undertaken in accordance with agreed methodologies.		Ongoing point of discussion
HE. HE.5	Surveys	The approach and contents of the Desk Based Assessment is appropriate for the wider assessment.		Ongoing point of discussion
HE.HE.6	Baseline environment	Sufficient primary and secondary data (including site-specific surveys) have been collated to appropriately characterise the onshore archaeology and heritage baseline environment for the purposes of EIA within Volume 3,		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Historic England's position	Status
		Chapter 5: Historic environment (APP-096).		
HE.HE.7	Assessment Methodology	The sensitivity and significance of the onshore archaeology receptors has been appropriately and adequately described within Volume 3, Chapter 5: Historic environment (APP-096).		Ongoing point of discussion
HE.HE.8	Assessment Methodology	The methodologies used in Volume 3, Chapter 5: Historic environment (APP-096) are appropriate for assessing the potential impacts the Transmission Assets on onshore archaeology and heritage assets.		Ongoing point of discussion
HE.HE.9	Project design envelope	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.		Ongoing point of discussion
HE.HE.10	Assessment of the effects from the project alone	The potential impacts identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the potential impacts in relation to onshore archaeology and heritage assets.		Ongoing point of discussion
HE.HE.11	Assessment of the effects from the project alone	The likely significant adverse residual effects (in EIA terms) identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on onshore archaeology.		Ongoing point of discussion
HE.HE.12	Assessment of the effects from the project	The likely significant adverse residual effects (in EIA terms) which are predicted to arise from the development		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Historic England's position	Status
	cumulatively with other projects	of the Transmission Assets cumulatively with other project and plans identified within Volume 3, Chapter 5: Historic environment (APP-096) represent a comprehensive list of the likely significant adverse residual effects on the historic environment.		
HE.HE.13	Mitigation	The mitigation measures identified in Volume 3, Chapter 5: Historic environment (APP-096) are considered appropriate and adequate for the Transmission Assets.		Ongoing point of discussion
Other Documents and Plans				
HE.HE.14	Outline Onshore and intertidal Written Scheme of Investigation (WSI)	The Outline Onshore and Intertidal WSI (APP-214) is secured under Requirement 11 of Schedules 2A and 2B of the draft DCO (AS-004) and is considered appropriate with regard to proposed monitoring and management principles	Historic England will engage with the Applicant on the SoCG for its next submission at Deadline 3 once it has submitted its Written Representation at Deadline 1.	Ongoing point of discussion

1.4.3 Marine Archaeology and Cultural Heritage

Table 1.6: Agreement Log between parties on Marine Archaeology and Cultural Heritage

Reference Number	Discussion point	Applicants' position	Historic England's position	Status
EIA				
HE.MACH.1	Consultation	The Applicants have undertaken adequate consultation with the HE on potential impacts on marine archaeology and cultural heritage.	Historic England will engage with the Applicant on the SoCG for its next submission at Deadline 3 once it has submitted its Written Representation at Deadline 1.	Ongoing point of discussion
HE. MACH.2	Consultation	The EIA has had due regard to matters raised by HE through statutory and non-statutory consultation on potential impacts on marine archaeology and cultural heritage.		Ongoing point of discussion
HE.MACH.3	Baseline environment	The Applicants have adequately characterised the baseline environment for marine archaeology and cultural heritage. The baseline is appropriate for the purpose of the EIA.		Ongoing point of discussion
HE.MACH.5	Scoping	Agreement to the scoping of impacts for the EIA for marine archaeology and cultural heritage.		Ongoing point of discussion
HE .MACH.6	Assessment methodology	The sensitivity of marine archaeology and cultural heritage receptors has been correctly identified and sufficiently described within the EIA.		Ongoing point of discussion
HE.MACH.7	Assessment methodology	The Marine archaeology and cultural heritage assessment is appropriate for predicting impacts on marine archaeology and cultural heritage receptors.		Ongoing point of discussion
HE.MACH.9	CEA assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.		Ongoing point of discussion
HE.MACH.10	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects on marine archaeology and cultural heritage for the impacts from the Transmission Assets alone with the implementation of mitigation (the Written Scheme of Investigation).		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	Historic England's position	Status
HE.MACH.11	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on Marine archaeology and cultural heritage for the impacts from the Transmission Assets when considered cumulatively with other plans and projects.		Ongoing point of discussion
HE.MACH.12	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 2, Chapter 8: Marine archaeology (APP-059), Volume 3, Chapter 5: Historic environment (APP-096) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided		Ongoing point of discussion
Other Documents and Plans				
HE.MACH.13	Outline Offshore Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD)	The Outline Offshore WSI and PAD (APP-222) is secured under Condition 18(1)(g) of Schedules 14 and 15 of the draft DCO (AS-004) and is considered appropriate with regard to proposed monitoring and management principles	Historic England will engage with the Applicant on the SoCG for its next submission at Deadline 3 once it has submitted its Written Representation at Deadline 1.	Ongoing point of discussion