

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

National Highways Statement of Common Ground



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Acronyms

Acronym	Meaning
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ExA	Examining Authority
OCTMP	Outline Construction Traffic Management Plan
OWL	Offshore Wind Limited

Acronym	Meaning
PEIR	Preliminary Environmental Information Report
PRoW	Public Rights of Way
RLB	Red Line Boundary
SoCG	Statement of Common Ground
SRN	Strategic Road Network

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

1.1 Introduction

1.1.1 Overview

- 1.1.1.1 This 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 National Highways, 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 National Highways is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025.
- 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.

1.1.2 Transmission Assets elements under National Highways remit

- 1.1.2.1 National Highways are responsible for the management, development and maintenance of the Strategic Road Network (SRN). All elements of the Transmission Assets landward of Mean High Water Springs may be relevant to National Highways in its function as a statutory consultee. These elements are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).
- 1.1.2.2 This SoCG covers the following topics of relevance to National Highways:
- Traffic and transport; and
 - DCO.

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 National Highways within its Relevant Representation and during post-application engagement.

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
Traffic and transport	Ongoing point of discussion
DCO	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 National Highways 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 National Highways during the post-application phases of the Transmission Assets. 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 National Highways and the Applicants.

1.3.1.3 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 National Highways and the Applicants. These documents are:

- The Technical Engagement Plan (APP-189) and appendices (APP-190, APP-191 and APP-192)
- The Consultation Report (APP-170) and annexes (APP-187 and APP-188)
- National Highways Relevant Representation (RR-1599)
- The Applicants' response to National Highways Relevant Representation at the Procedural Deadline.

Table 1.2: Summary of pre-application consultation with National Highways

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping			
08 December 2022	Scoping Opinion	Statutory	<p>Issue of Scoping Opinion. Responses focussed on:</p> <ul style="list-style-type: none"> • Noting the potential impact on the efficient operation of the SRN as a result of the Transmission Assets • Suggested scope of a Transport Assessment. • Outlining dates of acceptable traffic data (use of traffic data during the Covid-19 pandemic will not be considered appropriate).
Statutory (Section 42) consultation			
23 November 2023	Section 42 response	Statutory	<p>Section 42 response of National Highways. Response focussed on:</p> <ul style="list-style-type: none"> • Request for further information on traffic survey locations on the strategic road network. • Additional information on base traffic flows and growth factors applied on the proposed road schemes that have been considered. • Walking, cycling and horse-riding assessment and reviews (WCHAR) are considered within the assessment as there are pedestrian and cycling facilities at the M55 junctions. • Clarification on Transport Assessment Scoping Note.
Evidence Plan Process, Traffic and transport EWG			
16 March 2023	EWG01	Non-statutory engagement	Data, models and figures to be provided for methodology. Matters discussed include reviewing existing modelling and information requests for access track locations.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
12 September 2023	EWG02	Non-statutory engagement	Matters discussed include- LCC to provide modelling reports, agreement of PEIR approach, and liaising with Blackpool Council regarding the updated study area and RLB.
15 August 2024	EWG03	Non-statutory engagement	Site-selection updates, highlighting key changes in the Transmission Assets Order Limits; updates in the assessment baseline and the identification of new road schemes since the submission of PEIR and statutory consultation; transport EIA updates in line with the evolution of the project.

Table 1.3: Summary of post-application consultation with National Highways

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
20 March 2025	EWG04	Non-statutory engagement	<p>Project updates, review of National Highways' Relevant Representations including:</p> <ul style="list-style-type: none"> • Cumulative Projects • Driver Delay (Capacity) • Road Safety • Abnormal loads • Construction Traffic Management Plan • Decommissioning <p>The Statement of Common Ground was also discussed.</p>
16 May 2025	EWG05	Non-statutory engagement	<p>The meeting discussed the content of the Statement of common Ground and it was agreed that the National Highways were broadly content with the structure and headings in the SoCG and that the parties would work together post Deadline 1 to update the status of items.</p> <p>The Applicants also presented a summary of the work that was ongoing to provide the necessary clarifications to National Highways.</p>

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 and 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 Traffic and transport

Table 1.5: Agreement Log between the parties on Traffic and Transport

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
Environmental Impact Assessment (EIA)				
NH.TT.1	Consultation	<p>The Applicants have undertaken adequate consultation with National Highways and the EIA has had due regard to matters raised by National Highways through statutory and non-statutory consultation on potential impacts on traffic and transport.</p> <p>The Applicants and National Highways continue to work proactively to clarify matters raised during engagement. The Applicants consider that consultation is an area of agreement between the parties.</p>		Ongoing point of discussion
NH.TT.2	Policy and planning	<p>The Applicants have identified and considered all plans and policies relevant to traffic and transport, within National Highways remit.</p> <p>National Highways have not raised any concerns in regard to this matter within their Relevant Representation (RR-1599) or through engagement post-application. It is therefore considered by the Applicants that this matter can be agreed.</p>		Ongoing point of discussion
NH.TT.3	Surveys	<p>The site-specific surveys for traffic and transport have been undertaken in accordance with appropriate methodologies and sufficient primary and secondary data (including site-specific surveys) has been collated to appropriately characterise the traffic and transport baseline environment for the purposes of Environmental</p>		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		<p>Impact Assessment (EIA) within Volume 3, Chapter 7: Traffic and Transport (APP-108).</p> <p>This matter has been discussed with National Highways during the post-application engagement on the 20 March and 16 May 2025 and it has been agreed that National Highways agree with the scope and content of the baseline data collection presented in the ES, but that National Highways are seeking clarifications upon matters of detail. The Applicants are confident that following these clarifications this matter can be agreed.</p>		
NH.TT.4	Scoping	<p>Agreement to the scoping of impacts (including the approach to scoping out operational impacts) for the EIA for traffic and transport.</p> <p>National Highways have confirmed during post-application engagement on the 16 May 2025 that this matter is agreed. It is therefore considered that this matter can be agreed between the parties.</p>		Ongoing point of discussion
NH.TT.5	Study Area	<p>The traffic and transport study area is appropriate for the receptors, sites and impacts assessed.</p> <p>National Highways have confirmed in their Relevant Representation (RR-1599) and during the post-application meeting on the 16 May 2025 that this matter is agreed. It is therefore considered that this matter can be agreed between the parties.</p>		Ongoing point of discussion
NH.TT.6	Project design envelope	<p>The appropriate Maximum Design Scenario has been used to identify, describe and assess the construction vehicle trip generation, distribution and assignment in Volume 3, Annex 7.5:</p>		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		<p>Construction Vehicle Trip Assumptions (APP-115).</p> <p>National Highways have not raised any concerns in regard to these matters in their Relevant Representation (RR-1599) or post-application engagement. It is therefore considered that this matter can be agreed between the parties.</p>		
NH.TT.7	Assessment Methodology	<p>The sensitivity and significance of the traffic and transport receptors have been appropriately and adequately described within Volume 3, Chapter 7: Traffic and Transport (APP-108).</p> <p>National Highways have not raised any concerns in regard to these matters in their Relevant Representation (RR-1599) or post-application engagement. It is therefore considered that this matter can be between the parties.</p>		Ongoing point of discussion
NH.TT.8	Assessment methodology	<p>The methodologies used in within Volume 3, Chapter 7: Traffic and Transport (APP-108) are appropriate for assessing the potential impacts of the Transmission Assets.</p> <p>National Highways have not raised any concerns in regard to these matters in their Relevant Representation (RR-1599) or post-application engagement. It is therefore considered that this matter can be between the parties.</p>		Ongoing point of discussion
NH.TT.9	CEA assessment Methodology	<p>The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate. National Highways have identified four cumulative projects where they are seeking clarification upon the Applicants approach. The Applicants have agreed to provide this information to National Highways and are</p>		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		confident of reaching an agreement on this matter during the examination.		
NH.TT.10	Assessment of the effects from the Transmission Assets alone	<p>There will be no significant effects on the Strategic Road Network in EIA terms from the Transmission Assets construction traffic.</p> <p>National Highways have requested clarifications in regard to driver delay, road safety and abnormal load effects. The Applicants are working to provide National Highways with the necessary clarifications and are confident of reaching an agreement on these matters during the examination.</p>		Ongoing point of discussion
NH.TT.11	Assessment of the effects from the Transmission Assets cumulatively with other projects	<p>There will be no significant effects on the Strategic Road Network in EIA terms for the Transmission Assets cumulatively with other plans and projects.</p> <p>National Highways have identified four cumulative projects where they are seeking clarification upon the Applicants approach. The Applicants have agreed to provide this information to National Highways and are confident of reaching an agreement on this matter during the examination.</p>		Ongoing point of discussion
Other Documents and Plans				
NH.TT.12	Outline management plans	<p>The Outline Construction Traffic Management Plan (OCTMP) (APP-211) is secured as a requirement in the draft DCO (AS-004) and is appropriate with regards to proposed mitigation and monitoring.</p> <p>The Applicants have agreed the requirement to update the OCTMP and are in the process of sharing a draft with National Highways (following Deadline 1) for comment. It is envisaged that an</p>		Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		amended version of the OCTMP incorporating comments from National Highways will be submitted at Deadline 2. The Applicants are confident of reaching an agreement on the content of the OCTMP during the examination.		

1.4.3 DCO

Table 1.6: Agreement log between the parties on the DCO

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
NH.DCO.1	Development Consent Order	<p>The wording of the draft DCO (AS-004) is appropriate.</p> <p>The Applicants have discussed this matter with National Highways at a meeting on the 16 May 20025. National Highways have advised that they are satisfied with the Requirement wording as drafted and just have one outstanding comment on one Article. The Applicants are confident that of reaching an agreement on the content of the DCO during the examination.</p>		Ongoing point of discussion