

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Environment Agency SoCG



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Glossary

Term	Meaning
Applicants	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.
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 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
CoCP	Code of Construction Practice
DCO	Development Consent Order
EA	Environment Agency
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
ExA	Examining Authority
ES	Environmental Statement
FRA	Flood Risk Assessment
kV	Kilovolt
OWL	Offshore Wind Limited
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and the Environment Agency

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 the Environment Agency (EA), 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 the EA 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 the EA's remit

1.1.2.1 The EA is tasked with protecting and enhancing the environment as a whole and contributing towards sustainable development in England. All elements of the Transmission Assets may be relevant to EA in its function as a statutory consultee covering the intertidal and onshore works. These 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 the Environment Agency:

- Onshore Ecology and Nature Conservation
- Hydrology and Flood Risk
- Geology, Hydrogeology and Ground Conditions
- Development Consent Order
- Management Plans

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 the EA 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 the EA during the post-application phase (i.e. relevant representations and pre-examination meetings).

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: Examination Issues.

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 examination issues tracker present the position reached on 7 July 2025 (Deadline 3).

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
Onshore Ecology and Nature Conservation	Ongoing point of discussion
Hydrology and Flood Risk	Ongoing point of discussion
Geology, Hydrogeology and Ground Conditions	Ongoing point of discussion
Development Consent Order	Ongoing point of discussion
Management Plans	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 the EA during the pre-application phases of the Transmission Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with the EA during the post-application phases of the Transmission Assets.

Table 1.2: Summary of pre-application consultation with the Environment Agency

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Scoping Opinion			
08 December 2022	Scoping Opinion	Statutory	Issue of Scoping Opinion (APP-230). Responses focussed on: <ul style="list-style-type: none"> The need for fish and eel surveys. Request for the consideration of BNG and habitat improvement. The need to consider both formal and informal flood defences as part of the ES
Transmission Assets Evidence Plan Steering Group			
10 January 2023	Meeting 1	Non-statutory engagement	Matters discussed include introduction to the Transmission Assets, key milestones, pre-application process, purpose of the evidence plan process, overview of the expert working groups and agreeing ways of working.
11 May 2023	Meeting 2	Non-statutory engagement	Matters discussed include timeline of activities, site selection process, cable corridor selection process and designated site interactions.
16 July 2024	Meeting 3	Non-statutory engagement	Matters discussed include project and survey updates, route planning refinement post-PEIR, evidence plan process update and next steps.
Section 42 Consultation			
23 November 2023	Section 42 Statutory Consultation Response	Statutory engagement	Responses focussed on: <ul style="list-style-type: none"> The need to climate change guidance to be applied to FRA assumptions. The need for climate change allowances in the FRA. Peak river flow considerations. Climate change driven peak river flows and sea level rise considerations.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> • Consideration of flood risk arising from damage to existing flood defences. • The data used in the FRA. • The need for engagement with the Fylde Sand Dune Project. • Clarification on BNG calculations, strategy and requested updates. • Need for additional ecology surveys. • Water vole baseline. • Impacts to SSSIs including impacts on groundwater at Lytham St Annes Dunes SSSI. • Issues surrounding landfills north of the River Ribble.
Evidence Plan Process, Onshore Ecology and Nature Conservation EWG			
23 March 2023	EWG01	Non-statutory engagement	Matters discussed include overview of the Transmission Assets, programme, overview of EWG and EPP, onshore route planning a site selection, Scoping Opinion and summary of impact, onshore ecology and onshore and intertidal ornithology.
13 September 2023	EWG02	Non-statutory engagement	Matters discussed include updates on the onshore ecology assessment and the onshore and intertidal ornithology assessment including survey coverage, assessment methodology, conclusions, mitigation measures, and approach to Biodiversity net gain (BNG).
18/12/2023	EWG03	Non-statutory engagement	Matters discussed include proposed trenchless techniques and an overview, proposed methodology, baseline and existing schemes and projects for collaboration for biodiversity benefit.
26 January 2024	EWG04	Non-statutory engagement	Matters discussed include survey coverage for the application, Section 42 responses, use of trenchless techniques at crossing locations to avoid or reduce direct and indirect effects on onshore ecology and nature conservation, scope of

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			wintering bird data, information that would be required to demonstrate that the ancillary works would not cause indirect effects to habitats at Lytham St Anne's Dunes and River Ribble crossing.
31 May 2024	EWG05	Non-statutory engagement	Matters discussed include an update on surveys and proposed strategy, an update on survey coverage and next steps to be taken.
19 June 2024	EWG06A	Non-statutory engagement	Matters discussed include a site selection update (intertidal), survey update, summary of mitigation strategy, approach on reducing adverse effects, pre-construction surveys and monitoring of proposed mitigation areas.
27 June 2024	EWG06B	Non-statutory engagement	Matters discussed include a site selection update, landfall works, survey update, summary of mitigation strategy, approach on reducing adverse effects, pre-construction surveys and monitoring of proposed mitigation areas.
Evidence Plan Process, Hydrology and Flood Risk EWG			
3 May 2023	EWG01	Non-statutory engagement	Matters discussed include accessing and sharing data for the FRA, confirming metrics to be used in calculations.
10 August 2023	EWG02	Non-statutory engagement	Matters discussed include requesting missing map data from council, reviewing possibility of sending out RLB and borehole data, and climate data allowance update.
30 January 2024	EWG03	Non-statutory engagement	Matters discussed include the technical note on climate change datasets and models to be produced, mapping queries and joint SFRA feedback.
14 August 2024	EA Technical Meeting	Non-statutory engagement	Matter discussed centred around the submitted technical note on agreements required with the EA and the EAs response to this.

Table 1.3: Summary of post-application consultation with the Environment Agency

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
27 January 2025	Relevant Representation	Statutory consultation	Provision of EA's Relevant Representation (RR-0677)
24 April 2025	EA Technical Meeting	Non-statutory engagement	A meeting to discuss the Applicants responses to the EA relevant representations.

1.4 Examination Issues

- 1.4.1.1 This section of the SoCG sets out the level of agreement between the parties in relation to the Examination Issues log. 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: RAG Key for the Examination Issues Tracker

RAG status	Note
Red	Not yet agreed - The matter is not considered to be agreed between the parties.
Amber	Unresolved but working with Applicants on a solution. - The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties
Green	Agreed – The matter is considered to be agreed between the parties.

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

Table 1.5: Environment Agency Examination Issues Tracker

Subject	Work package	Scope	Method	Results	Mitigation	Requirement	Status at DCO Inquiry	Tier1 (matter for refusal)/ Tier2 (can be resolved in inquiry)	Notes
Ecology	Biodiversity Net Gain Strategy							Tier 2	Biodiversity Benefit Statement (APP-216) The EA note that the implementation of the Biodiversity Benefit Statement is non-statutory and is dependent on the acquisition of the relevant parcel of land. In the event that implementation is secured, the Environment Agency requests to be included as a consultee for the detailed enhancement measures for the Biodiversity Benefit Area at Lea Marsh Fields.
	Consideration of CRoW Assessments and Shoreline Management Plan								
	Water vole surveys								Additional late season surveys were completed autumn 2024 and report has been updated to reflect results.
	Cofferdam within sand dunes SSSI.								Cofferdam is not proposed within the SSSI at Lytham St Annes sand dunes.
	Impacts on saltmarsh								No impact on saltmarsh due to trenchless techniques.
	Potential impact of EMF on fish								We are satisfied with the conclusion that the depth of cable burial below the River Ribble of 7-45 m will mean that EMF will be negligible at the riverbed and therefore no impact on fish.
	Biosecurity Plan								Consultation with EA secured through Requirement 8
	Mitigation and enhancement measures for otters							Tier 2	Covered in Ecological Management Plan Requirement 12. We are not satisfied with the revised wording, 12 (1) (b) “ <i>the Environment Agency where works have the potential to impact wetland habitats</i> ”. We maintain our request that the EA is included as an unqualified consultee for the Ecological Management Plan
	Habitat improvement measures at Lea Marsh Fields and Dow Brook							Tier 2	In the event that implementation of the Biodiversity Benefit Statement is secured, the Environment Agency requests to be included as a consultee for the biodiversity benefit measures at Lea Marsh Fields.
Waste	Waste Management Strategy								Outline Site Waste Management Plan (APP-199)
Flood risk	Flood Risk Strategy / Assessment							Tier 2	FRA v3 submitted at Deadline 1 has been reviewed and minor amendments required. Other flood risk issues will be considered at detailed design. EA consultation on design details to be secured by protective provisions.
Flood risk	Soil Management Plan							Tier 2	RR 0677.22

									<p>The potential for temporary soil storage to divert or obstruct the flow pathways of overland surface water, resulting in increased flood risk.</p> <p>We are satisfied that this is covered in the associated best practice guidance Defra 2009 and Institute of Quarrying (IQ) Good Practice Guide for Handling Soils in Mineral Workings (IQ, 2021).</p>
Pollution prevention	Outline COCP								(APP-193) OCoCP and supporting Outline Management Plans
Ground water & contaminated land - (Risks to groundwater and Groundwater Dependent Terrestrial Ecosystems (GWDTE))	Hydrogeological Risk Assessment required.							Tier 2	<p>Hydrogeological Risk Assessment is secured through outline Code of Construction Practice and listed under sub-paragraph (2) (o) of Requirement 8.</p> <p>This specifies Lytham St Annes SSSI but should also specify the River Ribble crossing.</p> <p>EA await submission of Outline Hydrogeological Risk Assessment for review.</p>
	Foundation Works Risk Assessment.							Tier 2	<p>We are satisfied that the need for a Foundation Works Risk Assessment, where suspected contamination is present and deep foundation works are proposed, is covered under Requirement 8.</p> <p>We request the following amended wording to outline CoCP, Geology and ground conditions para 1.7.2.17:</p> <p>“...Where suspected contamination is present and piling <i>or deep foundation works</i> are proposed, detailed <i>foundation works</i> risk assessment(s) will be developed...”</p>
	Impact of heat from cables							Tier 2	<p>EA request further consideration of the impact of heat on groundwater/ GWDTE from underground cables.</p> <p>We note that consideration of this point is to be included in the outline Hydrogeological Risk Assessment</p>
WFD	WFD mitigation may be needed for changes in sediment transport								(APP-047) WFD coastal waters assessment
Amended timescales	EA requires 21 days to review consultations on matters specified in requirements							Tier 2	<p>Schedule 12 – Approval of matters specified in requirements</p> <p>We are not satisfied with the suggested wording ‘or a longer period is agreed with both the undertaker and the discharging authority’.</p> <p>We maintain our position that the Environment Agency requires 21 days to review consultations on matters specified in requirements.</p>
Protective Provisions								Tier 2	The EA's review of the amended EA standard PPs is ongoing.