

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Trinity House Statement of Common Ground



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Prepared by:

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

Prepared for:

**Morgan Offshore Wind Limited,
Morecambe Offshore Windfarm Ltd**

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Signatories

Signed	
Name	
Date	
Position	
For	Trinity House
Signed	
Name	
Date	
Position	
For	Morgan OWL
Signed	
Name	
Date	
Position	
For	Morecambe OWL

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.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above)
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning
Transmission Assets Order Limits: Offshore	The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning. Also referred to in this report as the Offshore Order Limits, for ease of reading.

Acronyms

Acronym	Meaning
ALARP	As Low as Reasonably Practicable
CBRA	Cable Burial Risk Assessment
CRNRA	Cumulative Regional Navigation Risk Assessment
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
IALA	International Association of Lighthouse Authorities
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MNEF	Marine Navigation Engagement Forum
NPS	National Policy Statement
NRA	Navigation Risk Assessment
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 Trinity House

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 Trinity House, 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 Trinity House 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 as set out in the Rule 6 letter (PD-006).

1.1.2 Transmission Assets elements under Trinity House's remit

1.1.2.1 Trinity House is the General Lighthouse Authority for England. It provides marine navigation aids to assist the safe passage of mariners through waters in these areas. It is also responsible for marking and dispersing wrecks which are a danger to navigation.

1.1.2.2 The elements of the Transmission Assets which may affect the interests of Trinity House are within Work Number 1A, 1B, 2A, 2B, 3A, 3B, 4A and 4B, seaward of Mean High Water Springs (MHWS). 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).

1.1.2.3 This SoCG covers the following topics of relevance to Trinity House:

- Shipping and navigation

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 Trinity House within its response to Section 42 consultation and as raised through the Marine Navigation Engagement Forum that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Trinity House 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: 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 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
Shipping and Navigation	Ongoing point under 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 Trinity House 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 Trinity House 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 Trinity House 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 Trinity House 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)
- Trinity House's Relevant Representation (RR-442)
- The Applicants' response to Trinity House's Relevant Representation at the Procedural Deadline (PDA-007).

Table 1.2: Summary of pre-application consultation with Trinity House

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
18 January 2023	Marine Navigation Engagement Forum	Non-statutory	Update on the Morgan Offshore Wind Project: Generation Assets, Morecambe Offshore Windfarm: Generation Assets, Mona Offshore Wind Project and Transmission Assets Project. Shipping and navigation work undertaken to date. Environmental Impact Assessment process and Preliminary Environmental Information Report (PEIR) statutory consultation as well as future planned activities.
24 May 2023	Marine Navigation Engagement Forum	Non-statutory	Location of the Morgan Offshore Booster Station and the potential risk of allision.
31 May 2023	Marine Navigation Engagement Forum	Non-statutory	Location of the Morgan Offshore Wind Project offshore booster station. Discussion on the potential impact to existing commercial routes, for example the dredger routes to/from Liverpool. Presented the future project vessel numbers for the Generation Assets to be considered within future traffic as well as anchoring activity and navigation simulations.
05 June 2023	Marine Navigation Engagement Forum	Non-statutory	Discussed the increased level of activity in the area, simultaneous operations (SIMOPS) and coexistence of users. Exclusion zones for ongoing oil and gas operations (as well as decommissioning). Consideration of oil and gas

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			activities within the vessel management plan, ferry route deviations. The cumulative issues with the other offshore wind projects, the location of the Morgan Offshore Booster Station in relation to Calder and CPP1 platforms and radar Early Warning System, and preservation of line of sight, bridging/liasing and additional risk controls were discussed.
06 June 2023	Marine Navigation Engagement Forum	Non-statutory	Reduction in under keel clearance and the location of the Morgan Offshore Wind Project: Offshore booster station was discussed.
07 June 2023	Marine Navigation Engagement Forum	Non-statutory	Cumulative impacts, location of the Morgan Offshore Wind Project: Offshore booster station, vessel traffic data consultation and fishing activity were discussed.

Table 1.3: Summary of post-application consultation with Trinity House

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
13 May 2025	Correspondence	Non-statutory	Engagement on the draft SoCG
24 June 2025	Meeting	Non-statutory	A meeting to discuss updates to the draft SoCG, pre-Deadline 3

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.

Position and colour coding	Definition of position
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 sets out the level of agreement between the parties for the relevant component of the application (as identified in section 1.1.2).

1.4.2 Shipping and Navigation

Table 1.5: Agreement log between parties on Shipping and navigation

Reference Number	Discussion point	Applicants' position	Trinity House position	status
Environmental Impact Assessment (EIA)				
TH.SN.1	Consultation	The Applicants have undertaken adequate consultation with Trinity House on potential impacts on Shipping and navigation.	Agreed.	Agreed
TH.SN.2	Consultation	The EIA has had due regard to matters raised by Trinity House through statutory and non-statutory consultation on potential impacts on Shipping and navigation.	Agreed.	Agreed
TH.SN.3	Policy and planning	The Application has identified and considered the plans and policies relevant to Shipping and navigation, within Trinity House's remit.	Agreed.	Agreed
TH.SN.4	Baseline environment	The Applicants have adequately characterised the baseline environment for Shipping and navigation. The baseline is appropriate for the purpose of the EIA and HRA.	Agreed.	Agreed
TH.SN.5	Scoping	Agreement to the scoping of impacts for the EIA for Shipping and navigation.	Agreed.	Agreed
TH.SN.6	Assessment methodology.	The sensitivity of Shipping and navigation receptors has been correctly identified and sufficiently described within the EIA.	Agreed.	Agreed
TH.SN.7	CEA assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	Agreed.	Agreed

Reference Number	Discussion point	Applicants' position	Trinity House position	status
TH.SN.10	Assessment of the effects from the Transmission Assets alone.	There will be no significant adverse effects on Shipping and navigation receptors for impacts from the Transmission Assets alone.	Agreed.	Agreed
TH.SN.11	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on Shipping and navigation for the impacts from the Transmission Assets when considered cumulatively with other projects, with the exception of impact to adverse weather routeing for Isle of Man Steam Packet Company (IoMSPC) and Stena Line when assessed cumulatively with the Morgan Offshore Wind Project: Generation Assets.	Agreed.	Agreed
TH.SN.12	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 2, Chapter 7: Shipping and navigation (APP-056) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided	Agreed.	Agreed
Draft Development Consent Order and Deemed Marine Licences				
TH.SN.13	Deemed Marine Licences (Schedules 14, 15, 16 and 17)	The Conditions set out in Schedule 14, 15, 16 and 17 of the DCO relevant to shipping and navigation, are appropriate.	Trinity House will provide its position on relevant DML conditions in its Written Representation at Deadline 1. 24 June 2025: All matters are agreed in the draft DCO submitted at Deadline 2. Watching brief for any changes to the draft DCO prior to Deadline 6 when the final SoCG will be submitted.	Ongoing point of discussion