

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

The Applicants' Statement of Commonality



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## Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project,

Term	Meaning
	through comparison with the existing and projected future baseline conditions.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
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 allows an applicant for to apply for 'deemed marine licences' in English waters as part of the development consent process
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.

Term	Meaning
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.
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 Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>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.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan Offshore Wind Project: Generation Assets	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 JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.



Term	Meaning
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
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 (such as construction compounds).
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.

Term	Meaning
Transmission Assets Order Limits: Onshore	<p>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>



## Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency

Acronym	Meaning
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPs	Protective Provisions
PPP	Pollution Prevention Plan
PRoW	Public rights of way
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

## Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz
KJ	Kilojoules
km	Kilometres
km <sup>2</sup>	Kilometres squared
kV	Kilovolt
m	Metres
m <sup>2</sup>	Metres squared
m <sup>3</sup>	Metres cubed
nm	Nautical mile
μPa	micropascal

# 1. Statement of Commonality

## 1.1 Overview

### Introduction

- 1.1.1.1 Statements of Common Ground (SoCGs) have been prepared between Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL), (together, the Applicants) and other parties. These have been prepared to set out the areas of agreement and disagreement with these parties in relation to the Development Consent Order (DCO) application for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets.
- 1.1.1.2 In the Rule 6 Letter dated 28 March 2025, the Examining Authority (ExA) requested that the Applicant prepare a Statement of Commonality. This document provides an overview of the approach taken to capture commonality with the parties specified in the Rule 6 Letter (Table 1.1), the status of each SoCG (Table 1.2) and the agreement status with the parties for the main topics (Table 1.4) in a tabular, colour-coded format as requested by the ExA.
- 1.1.1.3 This Statement of Commonality is intended to act only as a summary of the progress of the SoCGs. For full details of the items under discussion with each stakeholder, please refer to the relevant SoCG.
- 1.1.1.4 The Statement of Commonality and SoCGs will be updated at the relevant Deadlines during the Examination according to the Examination Timetable published in the Rule 8 Letter dated 8 May 2025.

## 1.2 List of Statements of Common Ground

- 1.2.1.1 The approach for capturing commonality between the Applicant and each party for whom the ExA has requested the submission of an SoCG in the Rule 6 Letter and additional parties for whom a SoCG has been proposed is provided in Table 1.1.

**Table 1.1: Approach to commonality for all parties with whom the ExA have requested the Applicant submit an SoCG.**

Doc No	Party	Approach to capturing commonality
S_D1_6.1/F03	Lancashire County Council	SoCG
S_D3_6.2/F02	Blackpool Borough Council	SoCG
S_D1_6.3/F02	Fylde Borough Council	SoCG
S_D4_6.4	Preston City Council	SoCG

Doc No	Party	Approach to capturing commonality
S_D1_6.5/F02	South Ribble Borough Council	SoCG
S_D1_6.6/F03	Environment Agency	SoCG
S_D1_6.7/F03	Historic England	SoCG
S_D1_6.8/F03	Marine Management Organisation	SoCG
S_D1_6.9/F03	National Highways	SoCG
-	Natural England	The Applicants and Natural England have jointly agreed not to submit a Statement of Common Ground at Deadline 1, 3 or 4. This will be replaced by a risk and issues log which will be submitted by Natural England at the appropriate deadlines during examination. The Applicants and Natural England will prepare a Statement of Common Ground at Deadline 6
S_D1_6.11/F02	Trinity House	SoCG
-	BAE Systems (Warton Aerodrome)	SoCG
-	Blackpool Airport Operations Ltd and Blackpool Airport Properties Ltd	Agreed a SoCG is not required at this stage to instead focus resource on cooperation agreement and land agreement negotiation.
-	Cadent Gas Limited	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
-	Canal & River Trust	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
S_D3_6.16/F02	National Farmers Union	SoCG
-	National Gas Transmission Ltd	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
-	National Grid Electricity Transmission Plc	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)

Doc No	Party	Approach to capturing commonality
-	Network Rail Limited	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
-	Orsted East Irish Sea Transmission Limited	Given the early stage of the East Irish Sea Transmission project there is not sufficient detail to enable the parties to prepare an SOCG, however, the Applicants will keep this under review
-	SABIC Petrochemicals Limited and SABIC Petrochemicals BV	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
-	SP Energy Networks	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
-	United Utilities Water Limited	SoCG not required on the basis that engagement will focus on negotiation of the Protective Provisions and associated side agreement where necessary. Updates are presented in Part 2 of the Land Rights Tracker (S_D1_15)
S_D1_6.24/F02	Maritime Coastguard Agency	SoCG
-	Newton with Clifton Parish Council	The Applicant is continuing to engage with Newton with Clifton Parish Council to determine the approach to recoding areas of agreement and disagreement. The Applicants will provide an update at Deadline 5
-	Freckleton Parish Council	The Applicant is continuing to engage with Freckleton Parish Council to determine the approach to recoding areas of agreement and disagreement. The Applicants will provide an update at Deadline 5

1.2.1.2 Table 1.2 provides the status of the SoCG submissions at each Examination Deadline at which the ExA has specified that SoCGs should be submitted in the Examination Timetable published in the Rule 8 Letter.

**Table 1.2: Status of SoCG submissions.**

Doc Ref	Party	Status at Deadline 1	Status at Deadline 3	Status at Deadline 4
S_D1_6.1/F03	Lancashire County Council	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D3_6.2/F02	Blackpool Borough Council	Draft SoCG provided to party, anticipated submission at Deadline 2	Initial SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.3/F02	Fylde Borough Council	Initial SoCG submitted	The Applicants continue to liaise with Fylde Borough Council to progress the preparation of a SoCG. Most recently, a series of topic specific meetings have been arranged, with some having taken place. These meetings have been specifically arranged with the preparation of the SoCG in mind. At this stage, the Applicants and Fylde Borough Council are working towards being able to submit a draft SoCG at Deadline 4.	Updated SoCG submitted at Deadline 4. The Applicants will continue to pro-actively engage with Fylde Borough Council to progress the SoCG
S_D4_6.4	Preston City Council	Draft SoCG provided to party, anticipated submission at Deadline 2	The Applicant met with Preston City Council on Monday 30 June and has agreed to further discussions before submitting the initial SoCG at Deadline 4	The Applicant previously met with Preston City Council on Monday 30 June with the intention of having topic specific meetings to progress the SoCG. However, the Applicants have not received any feedback/had any further meetings with Preston City Council. The Applicants will continue to pro-actively engage with Preston City Council to progress the SoCG
S_D1_6.5/F02	South Ribble Borough Council	Initial SoCG submitted	The Applicant met with South Ribble Borough Council and has agreed to further discussions before submitting the initial SoCG at Deadline 4	Updated SoCG submitted at Deadline 4







Doc Ref	Party	Status at Deadline 1	Status at Deadline 3	Status at Deadline 4
S_D1_6.6/F03	Environment Agency	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.7/F03	Historic England	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.8/F03	Marine Management Organisation	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.9/F03	National Highways	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.11/F02	Trinity House	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	The Applicants have not submitted an updated SoCG at Deadline 4 as all matters are agreed as of Deadline 3, but Trinity House are maintaining a watching brief on the draft DCO and will confirm final agreement at Deadline 6.
-	BAE Systems (Warton Aerodrome)	Draft SoCG provided to party, anticipated submission at Deadline 3	The Applicants and BAE Systems are making progress towards agreeing the list of topics and preliminary position statements to be included within a SoCG. Unfortunately, it has not been possible to reach agreement in advance of Deadline 3. BAE Systems and the Applicants have agreed to submit the SoCG in advance of the next set of Issue Specific Hearings (i.e. after Deadline 3 and before ISH2), at the discretion of the ExA. The Applicants expect BAE Systems to submit a similar request to the ExA to submit the SoCG outside of deadline	The Applicants have not submitted an updated SoCG at Deadline 4. The Applicants will continue to pro-actively engage with BAE Systems to progress the SoCG

Doc Ref	Party	Status at Deadline 1	Status at Deadline 3	Status at Deadline 4
S_D3_6.16/F02	National Farmers Union	Draft SoCG provided to party, anticipated submission at Deadline 2	Updated SoCG submitted at Deadline 3	Updated SoCG submitted at Deadline 4
S_D1_6.24/F02	Maritime Coastguard Agency	Initial SoCG submitted	Updated SoCG submitted at Deadline 3	The Applicants have not submitted an updated SoCG at Deadline 4 as all issues have been previously agreed.

## 1.3 Agreement status for each topic

- 1.3.1.1 Table 1.4 provides a summary of the agreement status by topic between the Applicant and other parties in the SoCGs at Deadline 4.
- 1.3.1.2 Table 1.3 provides the colour-coding system used in Table 1.4.

**Table 1.3: Position definitions and colour coding.**

Colour	Definition
	All matters agreed.
	Some matters under discussion, some matters agreed.
	All matters under discussion.
	Some matters under discussion, some matters not agreed.
	All matters not agreed.
	Some matters not agreed, some matters agreed.
	Some matters not agreed, some matters under discussion, some matters agreed.
	Topic not within remit of party and not covered in SoCG.

**Table 1.4: Status of agreement in SoCGs at Deadline 4.**

Doc Ref	Party	Air quality	Agriculture	Aviation and radar	Benthic, subtidal and intertidal ecology	Climate change	DCO	Marine licence	Fish and shellfish ecology	Geology, hydrogeology and ground conditions	Historic environment	Hydrology and flood risk	Land use and recreation	Landscape and Visual Resources	Management plans	Marine archaeology and cultural heritage	Noise and vibration	Onshore ecology and nature conservation	Onshore and Intertidal ornithology	Physical processes	Shipping and navigation	Socio-economics	Traffic and transport	Waste	Water Framework Directive
S_D1_6.1/F03	Lancashire County Council																								
S_D3_6.2/F02	Blackpool Borough Council																								
S_D1_6.3/F02	Fylde Borough Council																								
S_D4_6.4	Preston City Council																								
S_D1_6.5/F02	South Ribble Borough Council																								
S_D1_6.6/F03	Environment Agency																								
S_D1_6.7/F03	Historic England																								
S_D1_6.8/F03	Marine Management Organisation																								
S_D1_6.9/F03	National Highways																								
S_D1_6.11/F02	Trinity House																								
-	BAE Systems (Warton Aerodrome)																								
S_D3_6.16/F02	National Farmers Union																								
S_D1_6.24	Maritime Coastguard Agency																								