

# 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
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 8 August 2025 (Deadline 4).

### 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	Agreed

## 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
<b>Scoping</b>			
08 December 2022	Scoping Opinion	Statutory	<p>Issue of Scoping Opinion. Responses focussed on:</p> <ul style="list-style-type: none"> <li>• Noting the potential impact on the efficient operation of the SRN as a result of the Transmission Assets</li> <li>• Suggested scope of a Transport Assessment.</li> <li>• Outlining dates of acceptable traffic data (use of traffic data during the Covid-19 pandemic will not be considered appropriate).</li> </ul>
<b>Statutory (Section 42) consultation</b>			
23 November 2023	Section 42 response	Statutory	<p>Section 42 response of National Highways. Response focussed on:</p> <ul style="list-style-type: none"> <li>• Request for further information on traffic survey locations on the strategic road network.</li> <li>• Additional information on base traffic flows and growth factors applied on the proposed road schemes that have been considered.</li> <li>• 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.</li> <li>• Clarification on Transport Assessment Scoping Note.</li> </ul>
<b>Evidence Plan Process, Traffic and transport EWG</b>			
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"> <li>• Cumulative Projects</li> <li>• Driver Delay (Capacity)</li> <li>• Road Safety</li> <li>• Abnormal loads</li> <li>• Construction Traffic Management Plan</li> <li>• Decommissioning</li> </ul> <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>
23 June 2025	EWG06	Non-statutory engagement	During the meeting the following matters were discussed:

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>The content of the Statement of Common Ground with National Highways;</li> <li>The updates to the outline Construction Traffic Management Plan (oCTMP) (REP2-106);</li> <li>The Abnormal load studies (REP2-049 and REP2-050); and</li> <li>Road safety clarification note submitted direct to National Highways on the 17 June 2025.</li> </ul>
22 July 2025	EWG07	Non-statutory engagement	<p>During the meeting the following key matters were discussed:</p> <ul style="list-style-type: none"> <li>The cumulative assessment clarification note submitted direct to National Highways on the 1 July 2025;</li> <li>Details of peak hour and shoulder peak hour turning count information submitted to National Highways on the 7 July 2025; and</li> <li>The content of the Statement of Common Ground with National Highways.</li> </ul>

## 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.

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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
<b>Environmental Impact Assessment (EIA)</b>				
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.</p>	<p>National Highways agree that consultation to date has been proactive and effective, and anticipate that a satisfactory resolution to all matters raised relating to traffic and transport impacts on the SRN is likely to be achieved during the Examination.</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 do not have any concerns relating to the identification and consideration of relevant plans and policies.</p> <p>The matter is considered to be agreed between the parties.</p>	Agreed
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 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</p>	<p>TEMPro data in Volume 3, Annex 7.4, Appendix B [APP -114] has been reviewed and is accepted.</p> <p>Further information relating to TRIS data was received by email on 17/06/25 and is accepted.</p> <p>Further information relating to network peak and shoulder peak hours has been received by email on 09/07/25 and discussed on a call on 22/07/25.</p>	Agreed

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		data collection presented in the ES. National Highways have requested copies of construction traffic turning counts for the network peak and shoulder peak hours and these have been provided 7 July 2025 and discussed on the 22 July 2025.	This matter is now considered to be agreed between the parties.	
NH.TT.4	Scoping	Agreement to the scoping of impacts (including the approach to scoping out operational impacts) for the EIA for traffic and transport.  National Highways have confirmed during post-application engagement on the 16 May 2025 that this matter is agreed.	The matter is considered to be agreed between the parties.	Agreed
NH.TT.5	Study Area	The traffic and transport study area is appropriate for the receptors, sites and impacts assessed.  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.	The matter is considered to be agreed between the parties.	Agreed
NH.TT.6	Project design envelope	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: Construction Vehicle Trip Assumptions (APP-115).  National Highways have requested copies of turning counts for the network peak and shoulder peak hours and these have been provided 7 July 2025 and discussed on the 22 July 2025.	Further clarification was provided on the call on 22/07/25. This matter is now considered to be agreed between the parties.	Agreed
NH.TT.7	Assessment Methodology	The sensitivity and significance of the traffic and transport receptors have been appropriately and	The matter is considered to be agreed between the parties.	Agreed

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
		adequately described within Volume 3, Chapter 7: Traffic and Transport (APP-108).		
NH.TT.8	Assessment methodology	<p>The methodologies used 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 requested copies of turning counts for the network peak and shoulder peak hours and these have been provided 7 July 2025 and discussed on the 22 July 2025.</p>	<p>National Highways are in agreement with the overarching principals of the methodologies applied.</p> <p>Further clarification was provided by email on 09/07/25 and discussed on 22/07/25. This matter is now considered to be agreed between the parties.</p>	Agreed
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 discussed the high-level findings with National Highways on the 23 June 2025 and the suggested mechanisms to manage cumulative effects through a Transport Working Group (detailed in the outline Construction Traffic Management Plan (REP2-016)). Following this meeting, the Applicants have provided a note with the requested information to National Highways on the 1 July 2025.</p>	<p>It is noted that the OCTMP includes a commitment to establish a Transport Working Group in order to manage and coordinate construction traffic, and this is welcomed.</p> <p>Further information was received on 1 July 2025 and is being reviewed.</p> <p>The matter is now considered to be agreed between the parties.</p>	Agreed
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 copies of turning counts for the network peak and shoulder peak hours and these have been provided 7 July 2025 and discussed on the 22 July 2025.</p>	<p>Further information has been provided on abnormal loads and road safety which is accepted.</p> <p>It is noted that the OCTMP includes a commitment to establish a Transport Working Group in order to manage and coordinate construction traffic. On this basis, the matter</p>	Agreed

Reference Number	Discussion point	Applicants' position	National Highways' position	Status
			is now considered to be agreed between the parties.	
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 discussed the high-level findings with National Highways on the 23 June 2025 and the suggested mechanisms to manage cumulative effects through a Transport Working Group (detailed in the outline Construction Traffic Management Plan (REP2-016)). Following this meeting, the Applicants have provided a note with the requested information to National Highways on the 1 July 2025. The Applicants are confident of reaching an agreement on this matter during the examination.</p>	<p>Further information on cumulative assessment was received on 1 July 2025</p> <p>It is noted that the OCTMP includes a commitment to establish a Transport Working Group in order to manage and coordinate construction traffic. On this basis, the matter is now considered to be agreed between the parties.</p> <p>..</p>	Agreed
<b>Other Documents and Plans</b>				
NH.TT.12	Outline management plans	<p>The Outline Construction Traffic Management Plan (OCTMP) (REP2-106) is secured as a requirement in the draft DCO (REP2-004) and is appropriate with regards to proposed mitigation and monitoring.</p> <p>The Applicants are confident of reaching an agreement on the content of the OCTMP during the examination.</p>	<p>It is noted that the updated OCTMP submitted at Deadline 2 includes further detail on a number of aspects discussed with National Highways, which is welcomed.</p> <p>It is agreed that it is likely that the content of the OCTMP can be fully agreed during the Examination.</p>	Ongoing point of discussion

### 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 (document reference C1) Article 17 has been amended in agreement with National Highways Legal team. The Article 15 wording has not been amended as it is considered appropriate.</p> <p>The remainder of the draft DCO is appropriate as it relates to National Highways' remit.</p>	<p>National Highways accepts the points made in respect of Article 15 and Article 17, primarily on the basis that works to be carried out as part of the scheme will be on the local highways network rather than or near the SRN.</p> <p>On this basis, the matter is now considered to be agreed between the parties.</p>	Agreed