

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Spirit Energy SoCG F02



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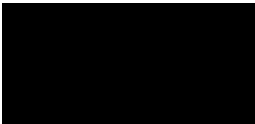

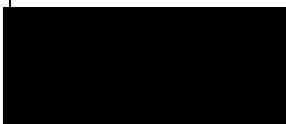
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Glossary

Term	Meaning
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
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	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 JERA Nex bp (JNbp) 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
ALARP	As Low As Reasonably Practicable
CIP	Copenhagen Infrastructure Partners
DCO	Development Consent Order
EnBW	Energie Baden-Württemberg AG
ExA	Examining Authority
JNbp	JERA Nex bp
MDS	Maximum Design Scenario
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
OWL	Offshore Wind Limited
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
VTMP	Vessel Traffic Management Plan

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

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 Spirit Energy Production UK Limited, (a Spirit Energy Limited group company) (hereafter referred to as Spirit Energy), 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 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.

1.1.2 Transmission Assets elements under Spirit Energy's remit

1.1.2.1 Spirit Energy is the operator of the Morecambe Hub which comprises three gas fields in the East Irish Sea: North Morecambe, South Morecambe and Rhyl. Spirit Energy is also designated duty holder, and therefore operator, of the East Irish Sea fields including Calder. The South Morecambe and Calder fields are located in close proximity to the Transmission Assets. Spirit Energy is also the holder of a Carbon Dioxide Appraisal and Storage Licence granted on 7 September 2023 (reference CS010) which licences the exploration of geological features for the storage of carbon dioxide, in support of the proposed Morecambe Net Zero Cluster carbon capture and storage (CCS) project. The elements of the Transmission Assets which may affect the interests of Spirit Energy are within Work Numbers 1A, 1B, 2A, 2B, 3A and 3B covering the offshore works of the Transmission Assets. These are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (document reference: C1).

1.1.2.2 This SoCG covers the following topics of relevance to Spirit Energy:

- Other Sea Users including shipping and navigation.

1.1.3 Morgan Generation Assets and Morecambe Generation Assets

- 1.1.3.1 The Morgan Generation Assets and Morecambe Generation Assets (the Generation Assets) are separate applications for the offshore generating elements of each respective windfarm and are subject to their own DCO applications and examination processes. Any impacts to Spirit Energy's assets or operations from the Generation Assets are being assessed, examined and considered as part of their respective separation applications.
- 1.1.3.2 The consent for Morgan Generation Assets was granted by the Secretary of State on 29 August 2025. The Morecambe Generation Assets is currently in the decision stage, with a decision required from the Secretary of State by 18 December 2025.

1.1.4 Overview of Transmission Assets

- 1.1.4.1 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. offshore export cables, onshore export cables and onshore 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.
- 1.1.4.2 Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (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.
- 1.1.4.3 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.

1.1.5 Approach to SoCG

1.1.5.1 In accordance with discussions between the parties, the SoCG is focused on those issues raised by Spirit Energy within its relevant representation (RR-0684) / response to Rule 6 letter and summary of relevant representation (PDA-045).

1.1.5.2 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 22 October 2025 (Deadline 6).

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
Other Sea Users including shipping and navigation	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 Spirit Energy during the pre-application phases of the Transmission Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicants with Spirit Energy during the post-application phases of the Transmission Assets.

Table 1.2: Summary of pre-application consultation with Spirit Energy

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
20 April 2022	Letter	Non-statutory	Anticipation of pipeline, cable crossing and/or proximity agreements to be established.
29 November 2022	Other Sea User questionnaire response	Non-statutory	Summary of present and future activity, including the decommissioning of the South Morecambe cluster and North Morecambe DPPA platform.
18 January 2023	Meeting	Non-statutory	Marine Navigation Engagement Forum (MNEF) meeting.
31 May 2023	Response to statutory consultation on the preliminary environmental information report (PEIR) for the Generation Assets	Non-statutory (with respect to the Transmission Assets)	Increased vessel activity requiring a navigation risk assessment (NRA) and identification of mitigation including simultaneous operation (SimOps) planning.
5 June 2023	Meeting	Non-statutory	The need for liaison over oil and gas assets that are planned to be repurposed / decommissioned in coming years. The need for the impact assessment to consider oil and gas assets in the context of any requirements for ferry route deviations and consideration of oil and gas assets within the vessel traffic management plan (VTMP) both project alone and cumulatively.
21 September 2023	Meeting	Non-statutory	MNEF meeting
8 November 2023	Meeting	Non-statutory	Overview of the Transmission Assets project and design. Discussed the Morgan route options under consideration that route through and over some of Spirit Energy's oil and gas

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<p>infrastructure (avoids platforms but will need to cross pipelines regardless of which final route is selected). Siting of booster station relevant to platforms and access</p> <ul style="list-style-type: none"> • Design work is ongoing, and another meeting will be held in the new year to discuss any further design considerations • Discussed resolution letter / letter of no objection for DCO application with draft Crossing and Proximity Agreements finalised pre-construction
11 November 2023	Meeting	Non-statutory	Presented overview of the Transmission Assets project and design and potential interaction with Spirit Energy assets.
23 November 2023	Response to statutory consultation on the PEIR	Statutory	Avoidance of decommissioned wells, cable installation methodologies, maintaining integrity of gas reservoirs, ensuring Spirit Energy can maintain monitoring and remediation license requirements. Additionally, co-existence related to continued petroleum operations, decommissioning activities, Carbon Capture and Storage (CCS) activities and potential wind farm development.
23 November 2023	Meeting	Non-statutory	The extent of routes and the volume of project vessels during the construction and operation and maintenance phase and the associated potential impacts on Spirit Energy's activities.
8 February 2024	Meeting	Non-statutory	MNEF meeting
28 February 2024	Meeting	Non-statutory	Post-PEIR design changes; removal of Offshore Substation Platforms (OSPs), interconnector cables and Morgan Offshore Booster Station from the maximum design scenario (MDS). Export cable crossings/proximity agreements.
6 March 2024	Meeting	Non-statutory	Update on design changes and requirements for proximity and / or crossing agreements.

Table 1.3: Summary of post-application consultation with Spirit Energy

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
24 January 2025	Relevant Representations	Statutory	<p>Spirit Energy raised concerns in relation to:</p> <p>Increased marine traffic in proximity to their assets.</p> <p>Cable routes to take due regards to their infrastructure.</p> <p>Vessels operating in proximity to their helicopter take off and approach at their assets.</p> <p>Impacts on the decommissioning of their assets and their ambitions of Morecambe Net Zero.</p> <p>Impacts of the Transmission Assets on Blackpool Airport and consequences to their safe and economic use of the facilities.</p> <p>Protective Provisions do not safeguard their interests.</p>
11 April 2025	Response to Rule 6	Statutory	As per response to Relevant Representations
04 July 2025	Response to Examiners Written Questions	Statutory	Spirit Energy noted that they had no contact with the Applicants in relation to the Examiners questions.
24 July 2025	Meeting (Teams)	Non-statutory	Agreement to produce a SoCG to track the points raised in their Relevant Representations.
17 September 2025	Meeting (Teams)	Non-statutory	Engagement of the draft SoCG for submission at Deadline 5.

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 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2) in relation to other sea users and shipping and navigation; although as there is overlap between these issues they are considered jointly within a single table.

1.4.2 Other sea users including shipping and navigation

Table 1.5: Agreement log between the parties on other sea users, including shipping and navigation

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
SE.OSU.1	Consultation	The Applicants have undertaken adequate consultation with Spirit Energy on matters with regards to the Transmission Assets as set out in Table 1.2 and has commitment to continued engagement with Spirit Energy post consent as set out in the agreement statements below and SE.OSU.10 in particular.	Spirit agrees that adequate consultation has taken place to date for the stage in the engineering design phase that the project is in. The Applicant commits to continued engagement and acknowledges that further extensive engagement will be required once the route has been selected.	Agreed
SE.OSU.2	Shipping and navigation	<p>During the construction of the Project a maximum of 30 vessels will be onsite at any one time, in the scenario where both Projects are undertaking concurrent offshore construction. For the one Project alone scenario the maximum is 19 vessels on site at any one time.</p> <p>The largest of these being cable lay vessels, a temporary rolling safety zone will be in-place around these vessels installing the offshore export cables, this will be managed and enforced by guard vessels and other safety vessels employed by the Applicants. Therefore, the actual area of impact to shipping and navigation during the construction of the Project will be very limited, to an area of approximately 500m around the cable lay vessel.</p> <p>Prior to the commencement of works advance warning will be provided via Notice to Mariners to ensure that the appropriate authorities are informed of offshore construction, operation and maintenance, and decommissioning activities.</p> <p>Noting the embedded and adopted mitigation measures (see SE.10 below), hazards have been</p>	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
		assessed as either Broadly Acceptable or Tolerable (if As Low As Reasonably Practicable (ALARP)) and there are no unacceptable hazards.		
SE.OSU.3	Siting of cables	<p>The Applicants are aware of Spirit Energy's infrastructure within the Transmission Assets Order Limits as shown within the Offshore Crossing Schedule (APP-025) and detailed in Volume 2, Chapter 9: Other Sea Users (APP-061) and in Volume 2: Figures 9.5, 9.6 and 9.7 (AS-039). As detailed throughout Volume 1, Annex 4.2: Selection and refinement of offshore infrastructure (APP-032), the Applicants considered existing oil and gas infrastructure within the routing of the offshore export cable corridors, avoiding oil and gas platforms and seeking to minimise crossings of infrastructure, where possible.</p> <p>The Applicants have also committed to entering into crossing and proximity agreements (as set out under SE.OSU.4 below), and therefore, will engage with Spirit Energy on the requirements for crossing and proximity to Spirit Energy's existing infrastructure post-consent once final project details are known, as is standard industry practice.</p> <p>The Applicants have and will continue to engage with Spirit Energy to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between the Transmission Assets and Spirit Energy's infrastructure and wells.</p>	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	Agreed
SE.OSU.4	Cable crossing and proximity	The Applicants have committed to entering into crossing and proximity agreements (as set out under SE.OSU.10 below), and therefore, will engage with Spirit Energy on the requirements for crossings and proximity to Spirit Energy's existing infrastructure post-consent once final project details are known, as is standard industry practice.	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
			concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	
SE.OSU.5	Helicopter operations	<p>The Applicants highlight that the Transmission Assets will have no permanent infrastructure above the sea surface following removal of the option for an Offshore Booster Station in response to statutory consultation on the Preliminary Environmental Information Report (PEIR) (section 4.5.2 of Volume 1, Annex 4.2: Selection and refinement of offshore infrastructure (APP-032)), and any potential offshore impacts associated with the laying of sub-sea cable infrastructure will be temporary and localised in discrete areas. As set out above in response to SE.OSU.2 there will be limited numbers of vessels on site at any one time, with the majority of these being smaller vessels such as crew transfer vessels, guard vessels, tugs/anchor handlers and support vessels.</p> <p>The Applicants have made a commitment to provide Notice to Mariners (CoT112) which will include information such as the number and types of vessels, locations, routes, duration, etc. This is secured by Condition 14 within Schedules 14 & 15 of the draft Development Consent Order (document reference: C1).</p> <p>As such, potential impacts on offshore aviation, including Spirit Energy helicopter operations, were scoped out of consideration (section 11.7 of Volume 3, Chapter 11: Aviation and radar (APP-130).</p>	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
		As set out under as set out under SE.OSU.10, the Applicants have included a new commitment in the Commitments Register submitted at Deadline 5 submitted at Deadline 5 (document reference F1.5.3/F06) (and secured in the Outline Communications Plan submitted at Deadline 5, document reference J1.1/F04) to " <i>Consultation with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities</i> ". The Applicants propose that the parties agree to meet on a regular basis to discuss their respective activity programmes in order to minimise disruption to either party's operations and to maximise coexistence.		
SE.OSU.6	Decommissioning	<p>The Applicants maintain that all of the relevant potential impact pathways on other sea users, including reduction/restriction of other offshore energy activities (section 9.11.5) have been identified and assessed in Volume 2, Chapter 9: Other Sea Users (APP-061). This includes consideration of oil and gas decommissioning that could occur during construction, operation, or decommissioning of the Transmission Assets, including the decommissioning of Spirit Energy's South Morecambe cluster and development of the Morecambe Net Zero cluster, with no significant effects identified.</p> <p>Additionally, the Applicants have made a new commitment to engaging with Spirit Energy to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities, as set out under SE.OSU.10.</p>	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
SE.OSU.7	Morecambe Net Zero cluster safeguarding	The Applicants position against SE.OSU.10 above would equally apply here.	Based on the technical information shared to date regarding the transmission route options Spirit agree that once the cable route is finalised, the parties will enter into the relevant crossing and/or proximity agreements in industry standard terms to cover the concerns noted in Spirit's Relevant Representation and any other arising concerns and or mitigation measures required to ensure adequate notice of plans and simultaneous operations are shared and managed to ensure the safe continuation of all Spirit East Irish Sea operations.	Agreed
SE.OSU.8	Blackpool Airport	The Applicants are working with Blackpool Airport Operations Limited (BAOL) and Blackpool Airport Properties Limited (BAPL) regarding the concerns raised by the airport and is actively consulting with BAOL and BAPL regarding the suitability of proposed mitigation measures. The Applicants and BAOL have been negotiating the terms of a Cooperation Agreement to facilitate construction and operation of the Transmission Assets through Blackpool Airport whilst ensuring the continued safe, efficient and uninterrupted operation of the Airport. The Applicants expect the Cooperation Agreement will be signed imminently and will provide an update to the Examination once signatures are confirmed. The Applicants understand that Blackpool Airport is representing the overall aviation interests of all the Airport's users, including Spirit Energy, in relation to the Transmission Assets application.	Spirit's understanding is in line with the Applicant's in that Blackpool Airport is engaged with the Applicant and representing the overall aviation interests of all users which includes to ensure that there is no interruption to Spirit aviation operations.	Agreed
SE.OSU.9	Protective provisions	The Applicants note that the draft Development Consent Order (AS-004) does not include protective	Spirit has agreed with the applicant that rather than focus efforts on Protective	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
		provisions in respect of Spirit Energy's infrastructure. As per the responses in RR-0684.2 to RR-0684.8, no significant effects will arise from the Transmission Assets on other sea users, including in relation to Spirit Energy's assets. The interfaces between the Applicants and Spirit Energy will be managed via an industry standard crossing / proximity agreements (see SE.OSU.4), engagement via the MNEF (SE.OSU.10) and a new commitment to engaging with Spirit Energy to promote and maximise cooperation between parties (see SE.10). Further protection is not considered necessary.	Provisions, once the final cable route has been decided, parties will engage to put in place the required crossing and/or proximity agreements in industry standard terms.	
SE.OSU.10	Mitigation	<p>The embedded mitigation measures described within Table 1.10 and potential additional risk control option (adopted by the Applicants) in Table 1.37 of Volume 2, Annex 7.1: Navigational Risk Assessment (APP-057) are appropriate. These mitigations include, but are not limited to the following:</p> <ul style="list-style-type: none"> • Notice to Mariners (CoT112 in the Commitments Register (document reference: F.1.5.3) and secured under condition 14(8) – (9) of schedule 14 and 15 of the draft DCO (document reference C1). • Vessel traffic management plan(s) (VTMP) including project vessel routing, vessel standards and codes of conduct (CoT69) in accordance with the outline VTMP (document reference: J21)) and secured under condition 18(1)(h) of schedule 14 and 15 of the draft DCO (document reference C1). • Offshore Emergency Response and safety plan(s) (CoT70) secured under condition 22 of schedule 14 and 15 of the draft DCO (document reference C1). 	Spirit agrees with the Applicants proposal that parties will meet regularly to establish respective activity programmes in order to minimise disruption to either party's operations and to maximise coexistence and to establish simultaneous operations procedures required. These will be in line with recognised industry good practice but not limited to those practices noted by the Applicant within this section.	Agreed

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
		<ul style="list-style-type: none"> Offshore environmental management plans (EMPs) including, amongst others, marine pollution contingency plan (CoT65) secured under condition 18(1)(f) of schedule 14 and 15 of the draft DCO (document reference C1). <p>These plans, amongst others, will define the construction and operation and maintenance activities, vessels, navigational practices (e.g. collision regulations, COLREGS), routing, operations and associated management thereof. With regard to Spirit Energy specifically, they include adherence to oil and gas safety zones for ongoing operations and decommissioning / repurposing activities.</p> <p>Ongoing engagement with Spirit Energy and other shipping and navigation stakeholders</p> <p>Additionally, the Applicants updated the Outline VTMP at Deadline 3 (REP3-035) to secure continued engagement with shipping and navigation stakeholders, including Spirit Energy, through the MNEF during the pre-construction and construction periods and for a minimum of 5 years into the operations and maintenance phase. This update was made to align with similar commitments made in the project-specific outline VTMP by both Morgan Generation Assets and Morecambe Generation Assets. The purpose of the post-consent MNEF will be to ensure that the appropriate authorities and stakeholders are informed of works being carried out in waters adjacent to the Transmission Assets. The Applicants anticipate that the frequency of MNEF meetings will be agreed with the group at the first meeting post-consent when the Applicants have a better understanding of the pre-construction programme and programme for preparation of key pre-commencement documents including the final</p>		

Reference Number	Discussion point	Applicants' position	Spirit Energy's position	status
		<p>VTMP. The MNEF has been and will be an open forum and will be inclusive for any additional stakeholders who may wish to attend it at any point in the future.</p> <p>Additionally, the Applicants have included a new commitment in the Commitments Register (document reference F1.5.3) to "<i>Consultation with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities</i>". The Applicants propose that the parties agree to meet on a regular basis to discuss their respective activity programmes in order to minimise disruption to either party's operations and to maximise coexistence. Where necessary, this will include establishing simultaneous operations procedures in accordance with recognised industry good practice such as the International Marine Contractors Association Guidance on Simultaneous Operations (IMCA 2023).</p>		

1.5 References

IMCA (2023). International Marine Contractors Association, Guidance on simultaneous operations (SIMOPS), Rev. 0.3, December 2023.