



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Outline Communications Plan



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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.
Baseline	The status of the environment without the Transmission Assets in place.
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).
Mean High Water Springs	The height of mean high water during spring tides in a year.
Morecambe OWL	Morecambe Offshore Windfarm Ltd (Morecambe OWL), owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V), is developing the Morecambe Offshore Windfarm located in the east Irish Sea.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore and onshore infrastructure connecting the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the national grid. 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 (Morgan OWL), a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW), is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project is a proposed wind farm in the east Irish Sea.
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.

Term	Meaning
Onshore substations	The area within the Transmission Assets Order Limits landward of Mean High Water Springs. Comprising the offshore export cables from Mean High Water Springs to the transition joint bays, onshore export cables, onshore substations and 400 kV grid connection cables, 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/biodiversity benefit are excluded from this area.
Order limits	The limits within which the Transmission Assets may be carried out.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits: Onshore	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). Also referred to in this report as the Onshore Order Limits, for ease of reading.

Acronyms

Acronym	Meaning
BAOL	Blackpool Airport Operations Limited
CCWG	Construction Coordination Working Group
CoCP	Code of Construction Practice
CTMPCos	Construction Traffic Management Plan Coordinators
CLO	Community Liaison Officer
DCO	Development Consent Order
Defra	Department for Environment & Rural Affairs
EnBW	Energie Baden-Württemberg AG
MMO	Marine Management Organisation
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
Morecambe OWL	Morecambe Offshore Windfarm Ltd
Morgan OWL	Morgan Offshore Wind Limited
JNbp	JERA Nex bp
oCTMP	Outline Construction Traffic Management Plan
PRoW	Public Rights of Way

Acronym	Meaning
RNLI	Royal National Lifeboat Institution

Units

Unit	Description
ha	Hectares
kV	Kilovolts
m	Metres
mm	Millimetres

1 Outline Communications Plan

1.1 Introduction

1.1.1.1 This document forms the Outline Communications Plan prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as ‘the Transmission Assets’).

1.1.1.2 This Outline Communications Plan was updated for Deadline 3 to include the reference to the communications plan that will be prepared with the Royal National Lifeboat Institution (RNLI) (see paragraph 1.4.1.3)

1.1.1.3 The Outline Communications Plan was updated at Deadline 4 in response to the following:

- Update to Requirement 8 wording in line with the draft Development Consent Order (REP3-009) to include Blackpool Airport Operations Limited (BAOL) as a consultee along with the relevant management plans upon which BAOL will be consulted by the relevant planning authority;
- Clarification of the roles and responsibilities for implementing this outline management plan; and
- Clarification that the measures within this outline management plan will be implemented during the onshore site preparation works.

1.1.1.4 The Outline Communications Plan updates for Deadline 5 include details of:

- consultation with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities (see paragraph 1.4.1.3);
- the role of the Construction Traffic Management Plan Co-ordinator;
- the local liaison committee; and
- communication of potentially noisy construction works in proximity to Public Rights of Way.

1.1.1.5 The Outline Communications Plan was also updated at Deadline 6 to include the following:

- Measures (commitments) adopted as part of Transmission Assets relating to the Outline Communications Plan
- Reference to the Agricultural Liaison Officers as defined in the Outline Code of Construction Practice (CoCP) (document reference J1)
- Clarification that local residents will be kept informed of nearby construction works taking place (see bullet 2 paragraph 1.5.1.3)
- Clarification that the frequency of the community-based events will be kept under review (see bullet 6 paragraph 1.5.1.3)

- Reference to the Construction Coordination Working Group (as defined in the Outline CoCP (document reference J1))
- Clarification that a Project(s) email address will be provided (in addition to a telephone hotline) for public enquiries during the construction process
- A commitment to prepare a bespoke Communications Plan for Wrea Green Equitation Centre.
- A commitment to prepare a bespoke Communications Protocol with Blackpool Airport and Warton Aerodrome.
- A commitment for local tourism-related businesses to be members of the local liaison committee(s).

1.1.1.6 The Outline Communications Plan updates for Deadline 7 include:

- A commitment to support Local Planning Authorities (LPAs) on the promotion of tourist destinations (within the immediate vicinity of the Transmission Assets) that may be affected by the construction activities associated with the Transmission Assets where this is a clear and proportionate need.

1.1.2 Overview

1.1.2.1 This Outline Communications Plan forms an appendix to the Outline Code of Construction Practice (CoCP) (document reference J1) which is a requirement of the draft Development Consent Order (DCO) (document reference C1). Following the granting of consent for the Transmission Assets, detailed Communications Plan(s) will be prepared as part of the detailed Code of Construction Practice(s) on behalf of Morgan OWL and or Morecambe OWL, prior to commencement of the relevant stage of works and will follow the principles established in this Outline Communications Plan. The detailed Communications Plan(s) will require approval by the relevant planning authority following consultation with relevant stakeholders. The Applicants and all appointed contractors will be responsible for the implementation of the detailed Communications Plan(s).

1.1.2.2 The Applicants have committed to implementation of detailed Communications Plan(s) via the following commitment, CoT35 (see Volume 1, Annex 5.3: Commitments Register, document reference F1.5.3), and is secured by inclusion of Requirement 8 of the draft Development Consent Order (DCO) (document reference C1) Schedules 2A & 2B. Below sets out the requirement wording for Project A (Project B's requirement mirror those of Project A for this requirement and are, therefore, not repeated):

8.—(1) No stage of the Project A onshore works or Project A intertidal works may commence until for that stage a code of construction practice has been submitted to and approved by the relevant planning authority following consultation as appropriate with

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- (a) Lancashire County Council;
- (b) Natural England;
- (c) the Environment Agency;
- (d) in relation to the Project A intertidal works or, if applicable to the Project A offshore works, the MMO; and
- (e) in relation to the Project A Blackpool Airport works, BAOL to the extent specified in the outline code of construction practice.
- (2) Each code of construction practice must accord with the outline code of construction practice and include, as appropriate to the relevant stage...

(a) communications plan (in accordance with the outline communications plan);...

(3) The code of construction practice approved in relation to the relevant stage of the Project A onshore works and Project A intertidal works must be followed in relation to that stage of the Project A onshore works and Project A intertidal works.

- 1.1.2.3 Requirement 8(1)(e) identifies BAOL as a named consultee prior to the approval by the relevant planning authority of detailed codes of construction practice. BOAL will be consulted in relation to a stage of construction that includes either the Project A Blackpool Airport Works or the Project B Blackpool Airport Works. With regards to the management plans to be appended (as appropriate to the relevant stage) to the detailed codes of construction practice, BAOL will be consulted on the Communications Plan(s) (in accordance with the Outline Communications Plan) by the relevant planning authority.
- 1.1.2.4 The Transmission Assets may adopt a staged approach to the approval of DCO requirements. This will enable requirements to be approved in part or in whole, prior to the commencement of the relevant stage of works in accordance with whether staged approach is to be taken to the delivery of the each of the offshore wind farms.
- 1.1.2.5 For onshore and intertidal works (landward of Mean Low Water Springs (MLWS)), this approach will be governed by the inclusion of Requirement 3 within the draft DCO, which requires notification to be submitted to the relevant planning authority/authorities detailing whether Project A and Project B relevant works will be constructed in a single stage; or in two or more stages to be approved prior to the commencement of the authorised development.

1.1.3 Purpose and scope of this Outline Communications Plan

- 1.1.3.1 The purpose of this Outline Communications Plan is to describe the framework for delivering communications during the onshore site preparation works and construction process.
- 1.1.3.2 Onshore site preparation works are defined in article 2 of the draft DCO (document reference C1). This Outline Communications Plan applies to

onshore site preparation works and construction activities located landward of MLWS.

1.1.3.3 Onshore site preparation works will be undertaken prior to the commencement of construction. These works will be undertaken in accordance with the measures set out within this Outline Communications Plan as certified through the DCO. The Community Liaison Officers and Agricultural Liaison Officers will be appointed for the onshore site preparation works. Contact details, including an email address and a telephone hotline, will be in place to record/address complaints and enquiries.

1.1.3.4 The measures within this Outline Communications Plan are in accordance with best practice and are appropriate to manage the impacts associated with onshore site preparation works and construction activities.

1.2 Roles and responsibilities

1.2.1 Overview

1.2.1.1 Although the construction team has not been appointed at the time of writing this plan, the key roles and associated responsibilities relating to this Outline Communications Plan are set out below. The Construction (Design and Management) Regulations 2015 also identify the legal duties, responsibilities and obligations of all the major roles within the construction team.

1.2.1.2 The detailed responsibilities of each role will be refined in the detailed Communications Plan(s).

1.2.2 Applicants

1.2.2.1 The Applicants will be responsible for the following:

- Ensuring that the Outline Communications Plan is implemented effectively,
- Giving necessary direction to contractors (for example, setting contractual obligations),
- Preparing the detailed Communications Plan(s) and undertaking reviews and refining the Communications Plan(s) (where necessary) in conjunction with the Community Liaison Officer.

1.2.3 Community Liaison Officers

1.2.3.1 Community Liaison Officers (CLOs) will be appointed by Morgan OWL and Morecambe OWL. The CLOs will be the dedicated contact for liaising with residents, local businesses and stakeholders) and will be responsible for:

- Implementing the outline and detailed Communications Plan(s)

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- Liaising with relevant stakeholders and relevant parties (including residents and local businesses)
 - Responding to enquiries from relevant stakeholders and parties
 - Organising and leading meetings with other construction projects in the vicinity of the Transmission Assets
 - Maintaining records relevant to the detailed Communications Plan(s)
 - Working with the Principal Contractors to ensure the construction team is aware of the Communications Plan(s) and the complaints procedure.

1.2.4 Agricultural Liaison Officers

1.2.4.1 Agricultural Liaison Officers (ALOs) will be appointed by Morgan OWL and Morecambe OWL. The ALOs will be the dedicated point of contact for notifications and ongoing engagement about practical matters with landowners, occupiers and their agents during the onshore site preparation and construction phases. The responsibilities of the ALOs are set out in the Outline CoCP (document reference J1).

1.2.5 Construction Traffic Management Plan Co-ordinators

1.2.5.1 Construction Traffic Management Plan Co-ordinators (CTMPCOs) will be appointed by Morgan OWL and Morecambe OWL. The CTMPCo(s) key responsibilities will include:

- Managing the implementation of the detailed CTMP(s)
- Collating monitoring data and preparing monitoring reports (as outlined in Section 1.15.1 of the Outline Construction Traffic Management Plan (oCTMP))
- Assisting the Community Liaison Officer in responding to comments from the local community
- Regular liaison and reporting to the Applicants
- Sharing information with emergency services e.g. dates of any road works, abnormal load movements, etc
- Monitoring and enforcing non-compliance
- Establishing and administering the Transport Working Group (see Section 1.14 of the oCTMP (document reference: J5) for details)
- Supporting with highway stakeholder engagement
- Acting as a point of contact for construction workers and sub-contractors.

1.2.6 Contractors/sub contractors

- 1.2.6.1 Contractors and sub-contractors will be required to understand their responsibilities and implement the measures within the Communications Plan(s).

1.3 Commitments

- 1.3.1.1 Through the EIA process, the Applicants have identified commitments which seek to eliminate or reduce impacts or adopt best practice guidance as part of the Transmission Assets and are recorded within Volume 1, Annex 5.3: Commitments Register of the ES (document reference F1.5.3). Where relevant, commitments have been detailed within subsequent sections of this Outline Communications Plan. All commitments associated with onshore and intertidal construction are provided in full within Table 1-1. These will be included within and developed further as part of the detailed Communications Plan(s).

Table 1-1: Measures (commitments) adopted as part of the Transmission Assets relevant to the Outline Communications Plan

Commitment (CoT) number	Measure adopted	How the measure will be secured (article references may be subject to change during DCO Examination)	Where is the commitment reference within the document?
CoT38	An Outline Construction Traffic Management Plan (CTMP) has been prepared and submitted with the application for development consent. CTMP(s) will be developed in accordance with the outline CTMP prior to construction. The detailed CTMP(s) will set out measures to include: ... 5. appointment of a Construction Traffic Management Plan Co-ordinator and Transport Working Group.	DCO Schedules 2A & 2B, Requirement 9 (Traffic and Transport)	Section 1.3.4
CoT137	The Applicants will consult, during all phases, with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between potentially conflicting activities	DCO Schedules 2A & 2B, Requirement 8 (Code of Construction Practice)	Section 1.5

1.4 Outline Communications Plan Framework

1.4.1.1 A detailed communications plan(s) will be developed as part of the CoCP.

1.4.1.2 The Applicants will ensure the detailed communications plan(s) will provide effective and transparent methods of communication and engagement with residents, businesses, the local community and any other relevant stakeholders who may be impacted by site preparation and construction works.

1.4.1.3 The Communications Plan Framework will be based broadly on the following principles:

- Provide communications in a clear and understandable way in which people can enquire about the construction of the Transmission Assets including in alternative formats (for example Braille, large print or easy read), upon request.
- Implementation and management of a telephone hotline and email address
- Occupiers of nearby properties will be informed in advance of the works taking place and will be kept regularly updated throughout the duration of any nearby works. Notification will be a minimum of 48 hours in advance (with the exception of emergency works).
- Regular meetings with a local liaison committee(s), comprising relevant local representatives. This will include, but not be limited to, Parish and Town Councils, nearby schools, businesses and tourism-related businesses, to effectively communicate upcoming construction activities and to establish the most appropriate timescale and the best way to disseminate this information to the community. The frequency and location of the local liaison committee meeting(s) will be determined in consultation with the relevant planning authority, taking account of feedback received from the local liaison committee.
- Hiring of Community Liaison Officers/Agricultural Liaison Officers (CLO/ALO)
- Development of a complaints management process and handling of complaints and enquiries (see paragraph 1.4.1.8).
- Delivery of community-based events, such as drop-in sessions and local meetings, as required, to provide opportunities for two-way engagement and discussion. The CLOs will provide themed feedback after events for dissemination to the local liaison committee(s).
- Development of project communication materials in alignment with key project milestones and project driven activities.
 - Development of a communications plan with the Royal National Lifeboat Institution (RNLI) in relation to the onshore and intertidal works at Landfall, including proactive coordination

regarding access to the Starr Gate Slipway and lifeboat operations.

- Consultation with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities
- In the event that the LPA demonstrates a clear and proportionate need, the Applicants shall give due consideration to the provision of support for the promotion of tourist destinations (situated within the immediate vicinity of the Transmission Assets) that may be directly affected by the associated construction activities. Such support may include, but not limited to, contributions towards the preparation and distribution of promotional materials or sponsorship of local events, provided that any such support is consistent with, and does not conflict with, the Applicants' overarching principles, policies, and statutory obligations.

- 1.4.1.4 At key project milestones and activities, information will be shared via various methods but not limited to letters, newsletters, local information events, website updates and email notifications and community events. Communications may include information about Public Rights of Way (PRoW) diversions, local traffic changes, project events, construction activity and confirmation of the construction scenario (concurrent, sequential or in-isolation). Information will also be shared about when potentially noisy construction activities will take place in proximity to nearby properties and PRoWs.
- 1.4.1.5 Where temporary diversions to any PRoW are required, the relevant local authority will be informed of the duration and the diversions proposed. Measures for managing PRoWs are set out in the Outline Public Rights of Way Management (document reference J1.5).
- 1.4.1.6 The above is a minimum expectation, and the projects will draw upon best practice and engagement with relevant stakeholders to provide a robust detailed communications plan, that satisfies local community and business needs in addition to wider relevant stakeholder requirements.
- 1.4.1.7 In addition to the detailed Communications Plan(s), the Applicants will also establish a Construction Coordination Working Group (CCWG). The CCWG will provide a forum for post-consent engagement between the Applicants and the local planning authorities, to ensure consideration is given to the potential for coordination (where appropriate) between the projects. The topics for discussion by the CCWG and indicative frequency of meetings are set out in section 1.2.2 of the Outline CoCP (document reference J1).
- 1.4.1.8 The detailed Communications Plan(s) will include a Complaints and Enquiries Management Procedure. The Complaints and Enquiries Management Process will provide formal lines of communication for external stakeholders, to communicate concerns and complaints to the Project(s). The Complaints and Enquiries Management Process will include the following principles:

- Formal or informal complaints will be reported to the project CLO
- Responses to complaints or enquires will be provided within 10 working days
- Investigation or resolution of complaints will be conducted in a timely manner
- The number and type of complaints and enquires received will be documented in a monthly report together with the actions taken to close complaints/enquiries and the dates the actions were taken. The monthly report will be shared via the CCWG.
- The monthly complaints and enquiries report will be used to support future engagement strategies with the local liaison committee(s) as appropriate.

1.4.1.9 The Applicants will prepare bespoke Communications Protocols for Blackpool Airport and Warton Aerodromes. The protocols will form part of the detailed Wildlife Hazard Management Plans.

1.4.1.10 The Applicants will prepare a bespoke Communications Plan for Wrea Green Equitation Centre due to the protected characteristics of some users of its facilities. The plan will be prepared in consultation with Wrea Green Equitation Centre and will be approved by the relevant planning authority. The Wrea Green Communications Plan (together with the detailed Construction Noise and Vibration Management Plan, Construction Traffic Management Plan and Construction Method Statement) will include measures to minimise potential impacts on the Wrea Green Equitation Centre and its users. These measures will include, but are not limited to:

Information provision / gathering

- Provision by the Applicants of a list of potential activities, including schedules of deliveries and activities (via the detailed Construction Traffic Management Plan) to discuss the context of Wrea Green Equitation Centre's current operation and mitigations that can be applied (i.e. timing and location of classes and works).

Engagement.

- Regular check-in calls prior to and during any works in the vicinity (in addition to any general project updates);
- Prior information and details about the works taking place in the vicinity of Wrea Green Equitation Centre (including agreement on what constitutes in the vicinity);
- Proposed start dates and durations of works;
- The ALO contact details; and
- The contractor's details.

Mitigations

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- Confirming any bespoke mitigations to be employed, relating to the key areas of concern for Wrea Green Equitation Centre including, but not limited to:
 - Layout of the temporary construction compound to minimise potential odour and visual impacts
 - Type of fencing and screening
 - Measures to minimise noise and vibration impacts associated with the setup, use and decommissioning of the temporary construction compound
 - Regular review (during check-in calls) of the efficacy of mitigation measures, including the protocols contained within the Wrea Green Communications Plan, to ensure measures can be amended as appropriate.
 - In addition, the Project has committed to providing an equine veterinarian or specialist to support and advise on potential additional mitigation measures during the construction phase. This will take into account the activities carried out during the pre-construction period and ensure expert input is available to understand the horses' behaviour and advice on measures that, alongside the Applicants' mitigation can be taken to acclimatise them to any changes in their environment.