



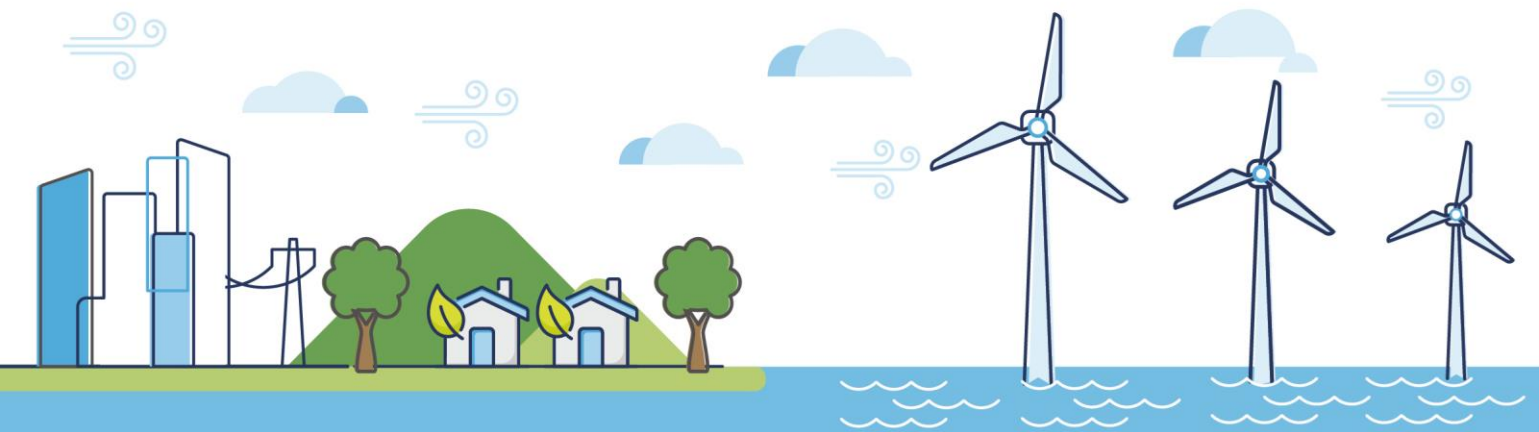
# Morecambe Offshore Windfarm: Generation Assets Examination Documents

## Volume 9

### Draft Statement of Common Ground with Historic England

Document Reference: 9.34

Rev 01



## Document History

<b>Doc No</b>	MOR001-FLO-CON-ENV-SCG-0019	<b>Rev</b>	01
<b>Alt Doc No</b>	PC1165-RHD-SG-XX-CO-Z-0025		
<b>Document Status</b>	Approved for Use	<b>Doc Date</b>	12 December 2024
<b>PINS Doc Ref</b>	9.34	<b>APFP Ref</b>	n/a

Rev	Date	Doc Status	Originator	Reviewer	Approver	Modifications
01	12 December 2024	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	n/a

## Contents

1	Introduction .....	9
1.1	Overview of the Project .....	9
1.2	Purpose of this document.....	9
1.2.1	Consultation with HE .....	10
1.2.2	Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters.....	11
2	Statement of Common Ground .....	12
2.1	Marine Archaeology and Cultural Heritage.....	12
3	Signatures .....	21
4	References.....	22

## Tables

Table 1.1 Topics included in the draft SoCG .....	10
Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters.....	11
Table 2.1 Summary of consultation with the HE.....	12
Table 2.2 Topics agreed, in discussion or not agreed with HE in relation to marine archaeology and cultural heritage .....	15

## Glossary of Acronyms

DCO	Development Consent Order
DML	Deemed Marine Licence
ES	Environmental Statement
FLO	Fisheries Liaison Officer
HE	Historic England
NFFO	National Federation of Fishermen's Organisations
NRW	Natural Resource Wales
OSP	Offshore substation platform
RIAA	Report to Inform Appropriate Assessment
SoCG	Statement of Common Ground
UK	United Kingdom
WTG	Wind turbine generator

## Glossary of Unit Terms

km <sup>2</sup>	square kilometre
MW	Megawatt

## Glossary of Terminology

Agreement for Lease (AfL)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.



# The future of renewable energy

A leading developer in Offshore Wind Projects



# 1 Introduction

## 1.1 Overview of the Project

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The windfarm was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the windfarm was received in 2023.
3. The AfL comprises an area of up to 125km<sup>2</sup> and reflects the windfarm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km<sup>2</sup>.
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSP(s)), and possible platform link cables to connect OSP(s)).
5. A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

## 1.2 Purpose of this document

6. This draft Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant). This identifies topic areas where there is agreement, areas of disagreement, and areas which remain under discussion in relation to the Development Consent Order (DCO) application for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project'). It is noted that this draft SoCG has been developed for Deadline 2, to reflect points raised and discussions between the parties on the Written Representation submitted by Historic England (HE) at Deadline 1, but is currently being reviewed by HE.
7. The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this draft SoCG.
8. This draft SoCG has been structured to reflect topics of the Application which are of interest to HE. HE (retaining the formal title of the Historic Buildings and

Monuments Commission for England) is the government service championing England’s heritage and giving expert, constructive advice.

9. Matters that are not yet agreed will be the subject of ongoing discussion (‘In Discussion’) between the Applicant and HE to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
10. Throughout the draft SoCG the phrase ‘Agreed’ identifies any point of agreement between the Applicant and HE. The phrase ‘Not Agreed’ identifies any points not agreed between the Applicant and HE.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to HE.

*Table 1.1 Topics included in the draft SoCG*

Topic/chapter	PINS reference
Draft Development Consent Order	APP-012
Chapter 15 Marine Archaeology and Cultural Heritage	APP-052
Outline Offshore Written Scheme of Investigation	APP-154
In Principle Monitoring Plan	APP-148

## 1.2.1 Consultation with HE

### 1.2.1.1 Pre-Application

12. The Applicant has engaged with HE on the Project during the pre-Application process, both in terms of informal non-statutory engagement and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
13. HE provided comments on the PEIR on 2<sup>nd</sup> June 2022 as part of the statutory consultation process.
14. Further to this, numerous meetings were held with HE through the EPP and also through regular update meetings. HE were only involved in the Historic Environment ETGs. These are detailed throughout the SoCG, and minutes of the ETG meetings are provided as Appendices to the Consultation Report (APP-016).
15. For further information on the consultation process please see the Consultation Report (APP-015).

### 1.2.1.2 Post-Application

16. The Applicant is committed to further engagement with HE as described in **Table 2.1**.
17. HE have provided a Relevant Representation (RR) in August 2024 and a Written Representation at Deadline 1 (REP1-095) that has been used to populate this draft SoCG.

### 1.2.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

18. In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or ‘in discussion’, the colour coding system set out in **Table 1.2** has been used.
19. Details on specific matters that are ‘Agreed’, ‘Not Agreed’ or ‘In Discussion’ are presented in **Table 2.2**.

*Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters*

Position status	Position colour coding
<b>Agreed</b> The matter is considered to be agreed between the parties.	Agreed
<b>Not Agreed – no material impact</b> The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the HE is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG.	Not Agreed – no material impact
<b>Not Agreed – material impact</b> The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the HE is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
<b>In Discussion</b> The matter is neither ‘agreed’ nor ‘not agreed’ and is a matter where further discussion is required between the parties	In Discussion

## 2 Statement of Common Ground

20. A summary of the consultation undertaken to date with HE and the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and HE during the pre-application phase) are set out below for each of the draft SoCG topic areas.

### 2.1 Marine Archaeology and Cultural Heritage

21. **Table 2.1** provides a summary of the consultation undertaken to date in relation to with HE regarding Marine Archaeology and Cultural Heritage. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with HE, as informed by the consultation and information exchanged between the Applicant and HE during the pre-application and examination phases of the Application.

*Table 2.1 Summary of consultation with the HE*

Date	Contact type	Owner	Topic
<b>Pre-application</b>			
October 2021 – June 2022	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project, indicative timelines and upcoming survey plan and methodology.
20 May 2022	Online meeting ETG1	Applicant	To discuss the EPP for the Project and share the Methodology and ToR. The Project was introduced to stakeholders, the likely timeline and the approach to EIA for Historic Environment was shared. The understanding of the baseline environment was shared for comment, as were potential impacts that were likely to be considered in the Scoping Report and the data sources used for the assessment
31 August 2022	Online meeting ETG 2	Applicant	Key comments on the Scoping Opinion were presented for discussion. Initial findings presented from initial geophysical analysis on magnetic anomalies and the seabed pre-history investigation approach, following collection of geotechnical cores. The initial coastal heritage setting assessment, study area and the approach to cumulative assessment were presented.
5 August 2022	Written submission	Applicant	Provision of Offshore Historic Environment ETG 1 Method Statement

Date	Contact type	Owner	Topic
			(FLO- MOR-MS-0004) to Historic England
2nd September 2022	Written submission	Historic England	Provision of a response on Offshore Historic Environment ETG 1 Method Statement (FLO-MOR-MS-0004) to Historic England
28 September 2022	Online Meeting ETG 2	Applicant	Feedback from completed ETG meetings / scoping RHDHV. Morgan OWF Leads joined for the second part of the meeting. Grid connection and consenting structure EPP Methodology and Terms of Reference discussed, approach to ETG and Transmission Steering Group and Cumulative impact approach.
14 November 2022	Online Meeting ETG 3	Applicant	Presented a summary of initial findings of the PEIR assessment. The mitigation strategies were presented including the use of Archaeological Exclusion Zones (AEZ) to avoid impacts to known assets, and micro-siting to avoid potential heritage assets. Presented an update on geophysical analysis including Sub-Bottom Profiler (SBP) data analysis being undertaken by MSDS Marine. Initial Findings of the Coastal Heritage Setting Assessment were shared with a summary of the heritage assets within the 50km study area. Projects and the study area of the cumulative assessment was shared. The approach and the initial findings of the historic seascape character were presented.
14 June 2023	Online Meeting ETG 4	Applicant	Project update shared with works completed since ETG 3 (PEIR published, statutory consultation closed, two years of ornithology and marine mammal digital aerial surveys completed, UXO identification and geotechnical surveys ongoing). The refinement of the windfarm site was shared with the altered western boundary of the site. Key comments from PEIR review by Historic England were shared. An update to the setting assessment was shared with assets identified for further assessment.

Date	Contact type	Owner	Topic
18 January 2024	Online Meeting ETG 5	Applicant	Project update shared. Details of the archaeological mitigation measures were provided and a summary of the Phase 2 Geotechnical survey campaign results from 2023 surveys provided. ES key findings were shared and discussions around the Outline Written Scheme of Investigation (WSI).
16 April 2024	Written submission	Historic England	Provision of a Stage 1 Geoarchaeological Assessment (MOR001-FLO-CON-ENV-TEC-0006) to Historic England
<b>Post-Application</b>			
29 August 2024	Online Meeting	Applicant	Project update shared. Details of Stage 3 geotechnical surveys completed. Discussions on development of SoCG.
2 December 2024	Online Meeting	Applicant	Project update shared. Discussions on Written Representation and development of SoCG.

Table 2.2 Topics agreed, in discussion or not agreed with HE in relation to marine archaeology and cultural heritage

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
<b>Environmental Impact Assessment (EIA)</b>				
HE 1	Consultation	<p>Historic England has been adequately consulted on marine archaeology and cultural heritage matters to date.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 2	Baseline environment	<p>The ES adequately characterises the baseline environment in terms of offshore archaeology and cultural heritage as detailed in Section 15.5 of ES Chapter 15 Marine Archaeology and Cultural Heritage (APP-052).</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 3	Survey data	<p>Survey data has been collected to inform the assessment as presented within ES Chapter 15 Marine Archaeology and Cultural Heritage. The data acquired, and the analysis of this data, is suitable to characterise the baseline environment for the purposes of the impact assessment.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
HE 4	Risk of encountering presently unknown elements of the historic environment	The Applicant acknowledges the risk of encountering 'potential heritage assets' and has made appropriate provision for survey campaigns which will be designed and planned in reference to an agreed archaeological WSI, This will be agreed post-consent (in line with the Outline Offshore WSI (APP-154)) to specify the methodological approaches to be followed to further qualify the nature of potential heritage assets with respect to the final design of the Project. The management of the risk has been specifically discussed in meetings between the Applicant and Historic England on 29 <sup>th</sup> August and 2 <sup>nd</sup> December in relation to Historic England's Relevant and Written Representations.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 5	Designated heritage assets	As set out in Section 15.6.2.5 of ES Chapter 15 Offshore Marine Archaeology and Cultural Heritage (APP-052) sufficient information has been provided to demonstrate that, although the Project would be visible from the designated heritage assets along the coastline, its presence would not detract from their archaeological, historic, and architectural interest and there would be no change to the significance of these designated heritage assets due to changes in their setting.  This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion



Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
<b>Assessment of effects</b>				
HE 6	Policy and legislation	The assessment is compliant with planning policy and legislation and the legislation, policy and guidance detailed in Section 15.4.1 of ES Chapter 15 Marine Archaeology and Cultural Heritage is relevant and in line with overarching National Policy Statement for Energy (EN-1) and National Policy Statement: Renewable Energy Infrastructure (EN-3). This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 7	Heritage asset categories	The list of categories of key known and potential heritage assets for consideration with regard to Marine Archaeology and Cultural Heritage is suitable to characterise the baseline environment for the purposes of the impact assessment. This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 8	Desk-based assessment sources	The list of sources for desk-based assessment for consideration with regard to Marine Archaeology and Cultural Heritage are suitable to characterise the baseline environment for the purposes of the impact assessment. This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
		Historic England's Relevant or Written Representations.		
HE 9	Study areas and assessment methodology	<p>The study area identified in Section 15.3.1 of ES Chapter 15 Marine Archaeology and Cultural Heritage is adequate for the assessment. The impact assessment methodology as presented in 15.4.3 of ES Chapter 15 Marine Archaeology and Cultural Heritage is adequate to assess the potential impacts of the project.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 10	Worst-case scenarios	<p>The worst-case scenarios presented in the assessment for the development scenarios, as outlined in Table 15.2 are adequate.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 11	Effects on marine archaeology and cultural heritage	<p>The Applicant considers the effects assessed for marine archaeology and cultural heritage are appropriate. The assessment of potential impacts for construction, operation and decommissioning are presented in Section 15.6 of ES Chapter 15 Marine Archaeology and Cultural Heritage.</p> <p>This has not been identified as an area of disagreement between the Applicant and</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
		Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.		
HE 12	Assessment methodology	<p>The impact assessment methodology as presented in 15.4.3 of ES Chapter 15 Marine Archaeology and Cultural Heritage is adequate to assess the potential impacts of the project.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 13	Cumulative effects assessment (CEA) methodology	<p>The assessment of cumulative effects, as detailed in Section 15.7 of ES Chapter 15 Offshore Archaeology and Cultural Heritage includes sufficient information on other developments in the area, including archaeological information from other projects in the region.</p> <p>This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.</p>	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
<b>Draft DCO - Outline Management Plans/ Mitigation and Monitoring</b>				
HE 14	Approach to defining Archaeological Exclusion Zones (AEZs)	The nature and extent of AEZs will be finalised and agreed in consultation with Historic England prior to construction based upon the archaeological assessment of preconstruction data with regard to a refined design footprint and to any other information which may come to light.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion

Topic/ref.	Discussion Point	Applicants position	HE position	Position summary
		This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.		
HE 15	Approach to further investigation	The Outline Offshore WSI (APP-154) sets out an approach to further investigation, post-consent, which will inform the appropriate application of mitigation measures inclusive of in-situ avoidance. This has not been identified as an area of disagreement between the Applicant and Historic England through ongoing consultation, nor through Historic England's Relevant or Written Representations.	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion
HE 15	In Principle Monitoring Plan (IPMP)	The IPMP effectively captures the relationship between the further development of the Project design and the delivery of further investigation and the application of mitigation measures, as detailed in the Outline Offshore WSI (APP-154).	Historic England have provided a Written Representation and their SoCG position response to be populated here is under legal review.	In Discussion

### 3 Signatures

22. The above draft SoCG is agreed between the Historic England and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of Historic England	
Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for an on behalf of the Applicant	

## 4 References

DESNZ (2024) Overarching National Policy Statement for Energy (EN-1)

DESNZ (2024) Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3)

IMO (2018). Revised Guidelines for Formal Safety Assessment (FSA) for use in the Rule Masking Process MSC-MEPC.2/Circ.12/Rev.2.

Morecambe Offshore Windfarm Ltd (2024) Consultation Report (APP-015)

Morecambe Offshore Windfarm Ltd (2024) Draft DCO (APP-012)

Morecambe Offshore Windfarm Ltd (2024) Chapter 15 Marine Archaeology and Cultural Heritage (APP-052)

Morecambe Offshore Windfarm Ltd (2024) Outline Offshore Written Scheme of Investigation( APP-154)

Morecambe Offshore Windfarm Ltd (2024) In Principle Monitoring Plan (IPMP) (APP-148)