



Historic England

██████████
Lead Member of the Panel of Examining Inspectors –
Morgan Offshore Wind Farm Generation Assets
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol BS1 6PN

10th December 2024

Dear ██████████,

**Application by Morgan Offshore Wind Limited for an Order Granting
Development Consent for the Morgan Offshore Wind Farm Generation Assets
PINs Ref: EN010136**

The Examination Authority – Deadline 4

Historic England registration identification number: 20049461

We offer this response regarding the following document that has been supplied to us by the Applicant (received by us on 4th December 2024) as referenced:

Morgan Offshore Wind Farm Project: Generation Assets. Outline offshore written scheme of investigation for archaeology. Document Number: MRCNS-J3303-RPS-10114, Document Reference: J14. Dated December 2024

In our response to First Questions (Your ref: REP3-032), we acknowledge that the Applicant would submit a revised Outline Archaeological Written Scheme of Investigation (WSI) at Deadline 4. We therefore hope that by providing our comments now will help facilitate the examination process by providing our advice at this deadline.

In regard to the above referenced WSI, we note the edits made in Section 1.4.6 (Research Frameworks) and we are pleased to see the attention now directed at questions specified within the North West Regional Research Framework (NWRRF). Furthermore, regarding the edits made in Section 1.7.5 (Geotechnical survey) we appreciate the attention given to production of a Morgan Generation Assets ground model. However, it is our advice that to optimise the time and effort committed to completing this task that this document is cross-referenced with any Outline



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archaeological Written Scheme of Investigation produced for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO application (PINs Ref: EN020028), which we understand has recently been accepted for examination (Planning Inspectorate letter to the Applicant, dated 18th November 2024).

We are also aware that the Morecambe Offshore Windfarm Generation Assets Project (PINs Ref: EN010121) is also presently going through examination and it is our advice that the best outcome is for coordinated action to be taken to optimise geoarchaeological analysis that spatially connects these three projects with a shared approach to addressing research questions, such as published through NWRRF.

In particular, it is apparent from the geoarchaeological analysis completed so far, as presented in *Morgan Offshore Wind Farm Project Marine Archaeological Technical Report*; Document Reference: F4.8.1; Examination Reference: APP-061 (Environmental Statement Volume 4, Appendix 8.1), and given the attention now directed at NWRRF, that there appears to be relevant connectivity with the proposed Morgan and Morecambe Transmission Assets project and possibility of encountering prehistoric sedimentary sequences of archaeological interest closer to the English coastline.

In National Policy Statement EN-3 (published November 2023), we are aware of the attention given to Applicants producing an “outline WSI”, as mitigation, such as described in paragraph 2.8.247 and the convention for programmes of archaeological works to be completed per DCO project. However, we take this opportunity to request that consideration should be given to realising benefits of coordination between these projects, such as alluded to in EN-3 in paragraph 2.8.162.

Although we appreciate that these are separate DCO applications, it would be sensible to make any accompanying geo-archaeological analysis programme as efficient as possible through contributing to a shared outcome that supports production of a unifying palaeo-environmental ground model. We therefore suggest that consideration is given to how such a matter could be captured within the Morgan Generation Assets Mitigation and Monitoring Schedule (Examination Ref: REP2-016), which for one matter (Section 1.3 Socio-economics) does mention the existence of one plan for both Morgan Generation and Morgan and Morecambe Transmission Assets projects. Perhaps it is possible to also reference a plan that would coordinate action to deliver the WSIs for each separate project?

We also concur with the edits made to Section 1.6.3 (Monitoring and Watching Briefs). We also acknowledge that the Applicant in document *Schedule of Change to the draft Development Consent Order (S_D2_8)*, Examination Ref: REP2-012, has amended the draft deemed Marine Licence Schedule 4, paragraph 20(2).

Yours sincerely,



Head of Marine Planning



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