

# MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

## Statement of Common Ground between Morgan Offshore Wind Limited and Historic England

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Image of an offshore wind farm

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

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## MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

### Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets, and associated activities.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

### Acronyms

Acronym	Description
AEZ	Archaeological Exclusion Zone
AHEF	Archaeology and Heritage Engagement Forum
DCO	Development Consent Order
EIA	Environmental Impact Assessment
GBS	Gravity Based Structure
OSP	Offshore Substation Platform
PAD	Protocol for Archaeological Discoveries
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
TAEZ	Temporary Archaeological Exclusion Zone
WHS	World Heritage Site
WSI	Written Scheme of Investigation

# **1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND HISTORIC ENGLAND**

## **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 (hereafter referred to as ‘the Applicant’) and Historic England, hereafter referred to together as 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 Offshore Wind Project: Generation Assets (hereafter referred to as ‘Morgan Generation Assets’).

1.1.1.2 The need for a SoCG between the Applicant and Historic England is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 5 August 2024 (PD-001).

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will facilitate further discussion between the parties and will be updated during the Morgan Generation Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-001).

### **1.1.2 Morgan Generation Assets Elements under Historic England’s Remit**

1.1.2.1 Historic England is the Government’s statutory adviser on the historic environment. It is Historic England’s duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment. This extends to monuments in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Historic England’s objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of the DCO for the Morgan Generation Assets.

1.1.2.2 This SoCG covers the following topics of relevance to Historic England:

- Effects to marine archaeology
- Effects to setting of terrestrial designated heritage assets including World Heritage Sites
- Adequacy of Outline Offshore Written Scheme of Investigation for archaeology and Protocol for Archaeological Discoveries
- Proposed temporary and permanent Archaeological Exclusion Zones and their radius or extent
- Principles for cable laying and protection.

### **1.1.3 Overview of Morgan Generation Assets**

1.1.3.1 Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The Morgan Generation Assets will include offshore infrastructure and consists of:

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- Morgan Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables and interconnector cables will be located.

**1.1.4 Approach to SoCG**

1.1.4.1 This SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Morgan Generation Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by Historic England within its response to Scoping, Section 42 consultation and as raised through the Evidence Plan process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Historic England during the post-application phase (i.e. relevant representations and pre-examination meetings).

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 Morgan Generation Assets. The agreement logs present the position reached on 16 January 2025 (Deadline 5).

**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.

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**Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.**

Topic	Agreed	Ongoing points of discussion	Not Agreed
Archaeology and Heritage	<p>The following issues are agreed:</p> <ul style="list-style-type: none"> <li>• Key impacts addressed</li> <li>• The methods employed for desktop data analysis</li> <li>• The baseline characterisation formed from desktop data and site-specific survey</li> <li>• The scope, approach and methodologies employed for geophysical survey and assessment of those data</li> <li>• Mitigation measures.</li> <li>• Outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD).</li> </ul>	<p>The following issues are not agreed, and discussion is ongoing:</p> <ul style="list-style-type: none"> <li>• The methods for impact assessment(s) (World Heritage Sites)</li> </ul>	<p>There are no points not agreed.</p>

## 1.3 Summary of Consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with Historic England, relevant to seascape, landscape and visual resources during the pre-application phases of the Morgan Generation Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with Historic England, relevant to archaeology and heritage during the post-application phases of the Morgan Generation Assets.

**Table 1.2: Summary of pre-application consultation with Historic England.**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>The Archaeology and Heritage Engagement Forum (AHEF)</b>			
30-11-22	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Presentation of the AHEF remit, ways of working and Road Map</li> <li>• Discussion of baseline approach to assessments.</li> </ul>
16-03-23	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Presentation of conclusions of the marine archaeology technical report</li> <li>• Discussion on historic seascape and how this would be addressed.</li> </ul>
13-07-23	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Discussion of key issues raised by key stakeholders in the statutory consultation responses</li> <li>• Project update following PEIR</li> <li>• Discussion on historic seascape</li> <li>• Inclusion of Isle of Man dataset.</li> </ul>
13-10-23	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>• Presentation of updated assessment and technical reports to address statutory consultation responses</li> <li>• Acknowledgement of the Maximum Design Scenario in relation to sandwave clearance</li> <li>• Discussion on the progress with the outline Written Scheme of Investigation.</li> </ul>

**Table 1.3: Summary of post-application consultation with Historic England.**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
05-07-24	Relevant representations	Statutory	Historic England's Relevant representations
22-08-24	Meeting	Non-statutory	Meeting to discuss SoCG template.
10-10-24	Meeting	Non-statutory	Meeting to discuss draft SoCG and written representation
08-11-24	Meeting	Non-statutory	Meeting to discuss draft SoCG
19-11-2024	Via correspondence	Non-statutory	Historic England's comments on the draft SoCG



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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
20-12-24	Meeting	Non-statutory	Meeting to discuss draft SoCG

**1.4 Agreement log**

**1.4.1 Overview**

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	The matter is not considered to be agreed between the parties.

**1.4.2 Archaeology and Heritage**

1.4.2.1 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.3) in relation to archaeology and heritage.

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**Table 1.5: Agreement Log between the parties on marine archaeology and cultural heritage.**

Reference Number	Discussion point	Applicant's Position	Historic England's position	Status
<b>EIA</b>				
HE.TBC.01	Consultation	The Application documents have had regard to matters raised by Historic England via statutory and non-statutory consultation activities in relation to marine archaeology.	Historic England has provided substantive pre-application advice about the scope of environmental assessment and the PEIR. This has been taken account of within the Application assessment.	Agreed
HE.TBC.02	Surveys	The data from the site-specific surveys made available to aid in the characterisation of the marine archaeology baseline environment has been collected and has been used in the archaeological assessment exercise.	Historic England acknowledges that the site specific surveys were undertaken by the Applicant, as described within the Environmental Statement (Volume 4, Appendix 8.1: Marine archaeological technical report; PINs Reference: APP-061), which have been used in the assessment presented.	Agreed
HE.TBC.03	Baseline environment	Sufficient primary and secondary data have been collated to appropriately characterise the marine archaeology baseline environment for the purposes of EIA within Volume 4, Annex 8.1: Marine Archaeology Technical Report (APP-061).	Historic England acknowledges the baseline environment assessment and characterisation conducted by the Applicant and the precautionary approach adopted by the Applicant due to poor survey data quality in parts of the proposed array area.	Agreed
HE.TBC.04	Assessment methodology	The sensitivity and significance of the marine archaeology receptors has been appropriately and adequately described within Volume 2, Chapter 8: Marine Archaeology (APP-026).	Historic England in our Written Representation (REP1-046, section 4.7) acknowledges that action to record sites only offsets the harm done and cannot remove the magnitude of the impact on as yet unknown marine archaeology receptors, which will be permanent. There are appropriate measures in the updated outline WSI (REP4-033) to ensure that any impacts are avoided, reduced or offset, as acknowledged in REP4-045.	Agreed
HE.TBC.05	Assessment methodology	The methodologies used in within Volume 2, Chapter 8: Marine Archaeology (APP-026) are appropriate for assessing the potential impacts of Morgan Generation Assets.	Historic England in our Written Representation (REP1-046, section 4.11). states that the recording of archaeological materials before loss does not reduce harm or magnitude of impact (such sensitivity is accepted by the Applicant), but can only off-set the loss of information. There are appropriate measures in the updated outline WSI	Agreed

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Reference Number	Discussion point	Applicant's Position	Historic England's position	Status
			(REP4-033) to ensure that any impacts are avoided, reduced or offset, as acknowledged in REP4-045.	
HE.TBC.06	Project design envelope	The assessment has appropriately defined the Maximum Design Scenario (MDS) for the purposes of EIA.	Historic England acknowledges the information presented by the Applicant regarding three MDSs (as described within Volume 2, Chapter 8 – Marine archaeology and cultural heritage (PINs Reference: APP-026). It is our advice that post-consent evaluation will be essential (subject to securing authorisation) and that such survey acquisition and data analysis must occur in a timely way to inform any pre-construction design finalisation. The text of the deemed Marine Licences ensures that post-consent evaluation will occur, as acknowledged in REP4-045.	Agreed
HE.TBC.07	Assessment of the effects from the project alone	The potential impacts identified within Volume 2, Chapter 8: Marine Archaeology (APP-026) represent a comprehensive list of the potential impacts in relation to marine archaeology.	Historic England acknowledges the potential impacts in relation to known Marine Archaeology, as described in Chapter 8, section 8.6.1 (maximum design scenario) have been assessed as necessary to conduct an EIA.	Agreed
HE.TBC.08	Assessment of the effects from the project alone	No significant adverse residual effects (in EIA terms) on marine archaeology are predicted to arise from the development of Morgan Generation Assets alone or cumulatively with other plans or projects.	There are appropriate measures in the updated outline WSI (REP4-033) to ensure that any impacts are avoided, reduced or offset, as acknowledged in REP4-045.	Agreed
HE.TBC.09	Assessment of the effects on the setting of selected designated historic assets – World Heritage Sites (WHS)	No significant adverse residual effects (in EIA terms) on the setting of selected designated terrestrial historic assets are predicted to arise from the development of the Morgan Generation Assets.  Historic England were consulted early on with regards to the approach proposed with regard to the two World Heritage Sites (WHS), and the applicant incorporated their comments within the assessment.  Given that the wider seascape setting of the WHS does not contribute positively to its Attributes, Special Qualities or Outstanding Universal Value, that the particular views in question already incorporate	Historic England acknowledges the attention given by the Applicant to identified heritage assets in the coastal zone (as defined by the Applicant) as set out in Volume 4, Annex 8.2 Cultural heritage assessment (PINS Reference: APP-062).  With reference to the Frontiers of the Roman Empire (Hadrian's Wall) WHS, we consider that there is very low potential for adverse impacts to the Outstanding Universal Value of the WHS as a result of the development of the Morgan Generation Assets.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	Historic England's position	Status
		<p>modern infrastructure including both land based and marine wind turbine arrays, and that the turbines of the Morgan Generation Assets would only be intermittently visible and even then largely behind existing wind turbines, an initial assessment determined that there would be no change to the Outstanding Universal Value of the WHS, and it was therefore not considered further in the detailed assessment.</p> <p>Given that no impacts were assessed for the Morgan Generation Assets upon the Outstanding Universal Value of the Lake District WHS, no assessment of cumulative impact was undertaken.</p>	<p>Regarding the English Lake District WHS, the scale of the WHS and the emphasis on harmonious beauty within the Outstanding Universal Value of the WHS justifies the consideration of potential impacts that may arise as a result of the development of the Morgan Generation Assets. These potential impacts to the Outstanding Universal Value of the English Lake District WHS should be properly assessed. Furthermore, there are other offshore wind energy developments in the vicinity which should be included in an assessment of cumulative potential impacts.</p>	
HE.TBC.10	Assessment of the effects on the setting of selected designated historic assets	No significant adverse residual effects (in EIA terms) on the setting of selected designated terrestrial historic assets are predicted to arise from the development of the Morgan Generation Assets.	<p>Historic England acknowledges the attention given by the Applicant to identified heritage assets in the coastal zone (as defined by the Applicant) as set out in Volume 4, Annex 8.2 Cultural heritage assessment (PINS Reference: APP-062).</p> <p>With references to Other Designated Heritage Assets, whilst the Morgan Generation Assets would be visible from identified designated heritage assets along the coastline, their presence would not detract from their archaeological, historic, and architectural interest. Therefore, we do not consider that there is any potential for adverse impacts to the setting of the nationally designated heritage assets as a result of the development of the Morgan Generation Assets.</p>	Agreed
HE.TBC.11	Mitigation	The mitigation measures identified within Volume 2, Chapter 8: Marine Archaeology (APP-026) and the Commitments register (formerly the Mitigation and monitoring schedule) (S_D4_16) and secured through the draft DCO (e.g. Archaeological Exclusion Zones and Temporary Archaeological Exclusion Zones) are appropriate in their location	Historic England concur with the decision to place AEZs, either individually or in cluster configuration around the anomalies considered to be of either 'high' or 'medium' potential and for the use of a Temporary AEZ (TAEZ) for the charted aircraft crash location and two sites in the array buffer zone. Furthermore, it is our position that TAEZs will be	Agreed

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Reference Number	Discussion point	Applicant's Position	Historic England's position	Status
		and extent, and will ensure significant effects are avoided.	required for any 'low' potential anomalies that on subsequent investigation reveal archaeological interest	
HE.TBC.12	Mitigation	<p>The principles for cable laying and installation of cable protection are sufficient to ensure significant effects are avoided.</p> <p>Relevant analysis of pre-commencement surveys during construction, operation and maintenance can be agreed and secured through the post-consent offshore written scheme of investigation for archaeology, to be secured within relevant provisions of the deemed marine licences in the draft DCO (REP1-021).</p>	Historic England advise that archaeological analysis is conducted of all pre-commencement survey data to actively inform cable route selection in order to determine the proximity of cable installation to features of known or possible archaeological interest and where possible avoid impact, directly or indirectly.	Agreed
HE.TBC.12	Mitigation	<p>The Applicant would like to highlight to Historic England, that to address the concerns of the MCA there will be a reduction in micro-siting allowance from the original 100 m (plus up to 25 m for installation tolerance) to 55 m (50 m for micro-siting and 5 m for tolerance) and intends to reflect this adjustment in relevant documents at Deadline 3.</p> <p>The reduction in the micro-siting from 125m to 55m will not lead to a change to the significance of effect on the archaeological resource already assessed and the mitigation measures identified within Volume 2, Chapter 8: Marine Archaeology (APP-026) and the Commitments register (formerly the Mitigation and monitoring schedule) (S_D4_16) and secured through the draft DCO will ensure significant effects are avoided or offset. This is applicable to jacket and GBS foundations.</p> <p>Where avoidance is not possible (and depending on the significance of the archaeological resource) the disturbance of archaeological sites or material can be mitigated by preservation by record, agreed in consultation with Historic England.</p>	The identification anomalies of archaeological interest is likely to increase when higher-resolution survey data are acquired and therefore adequate micro-siting and spatial avoidance will require detailed assessment. It is our advice that should unavoidable ground works occur e.g. as envisaged for MDS1 that mechanisms are essential to off-set any loss through capturing knowledge and understanding; although such action cannot reduce the actual harm that may have occurred. There are appropriate measures in the updated outline WSI (REP4-033) to ensure that any impacts are avoided, reduced or offset, as acknowledged in REP4-045.	Agreed

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Reference Number	Discussion point	Applicant's Position	Historic England's position	Status
<b>Other Documents and Plans</b>				
HE.TBC.13	Outline WSI and PAD	<p>The Outline WSI and PAD (APP-069), secured as a condition in the deemed Marine Licences (Schedules 3 and 4 of the dDCO), is considered appropriate with regard to proposed monitoring and management principles.</p> <p>A post-consent offshore written scheme of investigation for archaeology will be secured within relevant provisions of the deemed marine licences in the draft DCO (REP1-021). The wording can be reviewed and the Applicant has provided a response to Historic England's written representations relating to this matter.</p>	<p>The draft DCO includes deemed Marine Licences which include conditions securing the written scheme of investigation. The wording of these draft conditions ensures implementation in the crucial post-consent and pre-construction phase to inform the planning and engineering design, and delivery of the proposed project, as acknowledged in REP4-045.</p>	Agreed

## 1.5 References

Wessex Archaeology for The Crown Estate (2021) Archaeological Written Schemes of Investigation for Offshore Wind Farm Projects, Available at:

[REDACTED]