

MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Safety Zone Statement



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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 Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Limited is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) and Flotation Energy Ltd.
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 Offshore Wind Project: Generation Assets	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited is a joint venture between bp Alternative Energy investments Ltd. and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning.

Acronyms

Acronym	Meaning
DCO	Development Consent Order
DESNZ	The Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
MLWS	Mean Low Water Springs
MLWS	Mean Low Water Springs
OREI	Offshore Renewable Energy Installations
OSP	Offshore Substation Platform

Units

Unit	Description
kV	Kilovolts
m	Metres

1 Safety Zone Statement

1.1 Executive summary

1.1.1.1 The relevant legislation and guidance, as set out fully in Section 1.3 of the Statement, does not provide a mechanism for safety zones to be put in place for cable installation. However, the Applicants have voluntarily prepared this safety zone statement to provide clarity as to the approach that will be taken. The approach taken, being the proposed use of advisory exclusion zones, which is described in detail below and in Table 1.1, will help ensure navigational safety and minimise risk to vessels during installation of the Transmission Assets.

Table 1.1: Proposed safety zone details for the Transmission Assets

Phase	Proposed safety zone details
Construction	Advisory exclusion zones of 500m
Operation and Maintenance	N/A
Decommissioning	N/A

1.2 Background

1.2.1 Introduction

1.2.1.1 This document forms the Safety Zone Statement prepared for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (referred to hereafter as ‘the Transmission Assets’).

1.2.2 Project overview

1.2.2.1 Morgan Offshore Wind Limited (Morgan OWL), a joint venture between bp Alternative Energy Investments Ltd (bp) 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.

1.2.2.2 Morecambe Offshore Windfarm Ltd (Morecambe OWL), a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd, is developing the Morecambe Offshore Windfarm, also located in the east Irish Sea.

1.2.2.3 The purpose of the Transmission Assets is to connect the Morgan Offshore Wind Project: Generation Assets and Morecambe Offshore Windfarm: Generation Assets (referred to collectively as the ‘Generation Assets’) to the National Grid.

1.2.2.4 Morgan OWL has also separately applied for a DCO for the Morgan Offshore Wind Project: Generation Assets and Morecambe OWL has separately applied for a DCO for the Morecambe Offshore Windfarm: Generation Assets.

1.2.2.5 Morgan OWL and Morecambe OWL (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 onward connection to the National Grid at Penwortham, Lancashire.

1.2.2.6 The key components of the Transmission Assets include offshore elements, landfall and onshore elements.

1.2.2.7 This Safety Zone Statement has been developed for the offshore and intertidal elements of the Transmission Assets, seawards of Mean High Water Springs (MHWS). The elements of the Transmission Assets relevant to this statement are:

- Offshore export cables.

1.2.2.8 Details of the activities and infrastructure associated with the Transmission Assets are set out in Volume 1, Chapter 3: Project Description of the Environmental Statement (ES) (document reference F1.3).

1.2.3 Purpose of the Safety Zone Statement

1.2.3.1 This Safety Zone Statement (the Statement) has been prepared on behalf of the Applicants and forms part of the application (the Application) for a Development Consent Order (DCO), submitted to the Secretary of State pursuant to the Planning Act 2008 (the 2008 Act).

1.2.3.2 Regulation 6(1)(b)(ii) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations) requires an applicant seeking consent for an offshore generating station to submit a statement accompanying its application for a DCO confirming whether applications will be made for safety zones. As is set out in section 1.2, the Applicants are not seeking consent for an offshore generating station and this Safety Zone Statement has been voluntarily prepared taking the APFP Regulations into account.

1.2.4 Structure of this document

1.2.4.1 This document is set out as follows.

- Section 1.1 provides an executive summary for the Safety Zone Statement.
- Section 1.2 introduces the document including background on its purpose and structure.
- Section 1.3 provides an overview of the Transmission Assets, covering scope of works relevant to this Safety Zone Statement.
- Section 1.4 gives information on the legislative relating to applications for safety.
- Section 1.5 covers the approach to Safety Zones taken by the Generation Assets.

- Section 1.6 describes the approach to Safety Zones to be taken by the Morgan OWL and Morecambe OWL for the Transmission Assets.

1.3 Scope of the Transmission Assets Offshore and Intertidal Works

- 1.3.1.1 The Transmission Assets draft DCO (document reference C1), to be submitted by the Applicants, seeks consent for the offshore and onshore transmission assets for both the Morgan Offshore Wind Project: Transmission Assets (Project A) and the Morecambe Offshore Windfarm: Transmission Assets (Project B). Both Morgan OWL and Morecambe OWL are therefore named undertakers in the draft DCO (document reference C1). Morgan OWL is the named undertaker in respect of the Project A works and Morecambe OWL is the named undertaker in respect of the Project B works.
- 1.3.1.2 The Transmission Assets draft DCO offshore and intertidal works, are set out in Schedule 1 Part 1 of the draft DCO (document reference C1) and the offshore and intertidal works relevant to this Safety Zone Statement are repeated below:

Project A offshore and intertidal works

- 1.3.1.3 Work No. 1A – Morgan offshore cable works including —
- up to four subsea cable circuits between the Morgan offshore substation platforms and Work No. 2A; and
 - cable crossings and cable protection.
- 1.3.1.4 Work No. 2A – Morgan offshore cable works including —
- up to four subsea cable circuits between Work No.1A and Work No. 4A; and
 - cable crossings and cable protection.
- 1.3.1.5 Work No. 4A – Morgan intertidal cable works including —
- up to four cable circuits and associated cable ducts laid underground by either open cut trenching, trenchless installation technique works or direct pipe works including associated pits;
 - erection of temporary cofferdams;
 - construction compounds; and
 - permanent access.

Project B offshore and intertidal works

- 1.3.1.6 Work No. 1B – Morecambe offshore cable works including—
- up to two subsea cable circuits between the Morecambe offshore substation platforms and Work No. 2B; and
 - cable crossings and cable protection.
- 1.3.1.7 Work No. 2B – Morecambe offshore cable works including—

- a. up to two subsea cable circuits between Work No.1B and Work No. 4B; and cable crossings and cable protection.

1.3.1.8 Work No. 4B – Morecambe intertidal cable works including—

- a. up to two underground cable circuits and associated cable ducts laid underground by either open cut trenching, trenchless installation technique works or direct pipe works including associated pits;
- b. erection of temporary cofferdams;
- c. construction compound; and
- d. permanent access.

1.3.1.9 The Transmission Assets Order Limits: Offshore (hereafter referred to as the Offshore Order Limits) are shown in the Offshore Order Limits and Grid Coordinates Plan (document reference B5).

1.3.1.10 Further details of the key components of the Transmission Assets can be found in Volume 1, Chapter 3: Project Description of the Environmental Statement (document reference F1.3) with further information as to the Transmission Assets contained within the draft DCO and Works Plans – Onshore and Offshore (document references C1 and B7, respectively).

1.4 Legislative context

1.4.1.1 Section 95 of the Energy Act 2004 provides for applications to be made to the Secretary of State for safety zones around Offshore Renewable Energy Installations (OREI). OREI are further defined in Section 104 of the Energy Act 2004 and summarised in the Department of Energy and Climate Change: Applying for safety zones around offshore renewable energy installations – Guidance Notes (November 2011 (Revised) (the Guidance Notes) as offshore installations which:

- a. are used (or will be used or, in the case of decommissioning, have been used) for purposes connected with the production of energy from water or winds;
- b. permanently rest on, or are permanently attached to, the bed of the waters; and
- c. are not connected with dry land by a permanent structure providing access at all times, for all purposes.

1.4.1.2 Paragraph 2.3 of the Guidance Notes confirms that the safety zone scheme does not cover export cables or inter-array cables, or parts thereof, located outside an approved safety zone.

1.4.1.3 Paragraph 3 of Schedule 16 to the Energy Act 2004 requires that the following information should be included within a written application for safety zones in respect of an offshore generating station:

- a. a map showing:
 - i. the place where the relevant renewable energy installation is to be, or is being, constructed, extended, operated or decommissioned; and
 - ii. the waters in relation to which any declaration applied for will establish a safety zone; and

- b. a description of the other provisions the application seeks and such information as may be prescribed by regulations.

1.4.1.4 In addition to the above information, Regulation 3 of the 2007 Regulations requires the following to be provided as part of the application:

(a) For any proposed or existing relevant renewable energy installation:

- i. a description of the installation and its proposed or existing location and dimensions (including an explanation of how much of it is (or is expected to be) visible above the water line and how much below it), supported by drawings;
- ii. a description of how the installation operates (or is to operate);
- iii. a description of the location (or proposed location) of—
- iv. (aa) any electric line used (or proposed to be used) for the conveyance of electricity to or from the installation; and (bb) any connection to such an electric line;
- v. a description of the location (or proposed location) of any offshore substation housing connection equipment;
- vi. where the zone is sought in respect of more than one relevant renewable energy installation, the proposed or existing distances between such installations; and
- vii. details of any navigational marking that has been specified for use with an installation of the description in question by a general lighthouse authority;

(c) in relation to the proposed safety zone —

- i. whether the zone relates to the construction, extension, operation or decommissioning of the relevant renewable energy installation;
- ii. whether the applicant seeks the declaration of a standard safety zone, or if not, what dimensions are sought for that zone;
- iii. a description of those works or operations in respect of which the zone is being applied for and their estimated date and duration;
- iv. whether the applicant proposes that the area of the zone will vary and any factors or determinations by reference to which the applicant proposes that such variation may take place;
- v. whether the zone relates to Major maintenance works in respect of a relevant renewable energy installation which has become operational;
- vi. a statement setting out what steps, if any, the applicant proposes to take to monitor vessels and activities within the zone; and
- vii. except where the Secretary of State has notified the applicant that it is not required, an up to date shipping traffic survey for the waters comprising the zone; and

(d) an assessment of the extent to which navigation might be possible or should be restricted, and whether restrictions would cause navigational problems, within or near waters where the relevant renewable energy

installation is to be, or is being, constructed, extended, operated or decommissioned, as the case may be.

- 1.4.1.5 Pursuant to Section 95(2) of the Energy Act 2004, the purposes for which the Secretary of State may consider it appropriate to issue such a notice (as set out at Section 1.2.1.3(c)(vii) above) are for the purposes of securing the safety of:
- the renewable energy installation or its construction, extension or decommissioning;
 - other installations in the vicinity of the installation or the place where it is to be constructed or extended;
 - individuals in or on the installation or other installations in that vicinity; or
 - vessels in that vicinity or individuals on such vessels.
- 1.4.1.6 Regulation 4 of the 2007 Regulations sets out publication requirements for any safety zone application(s), including the issue of copies of the notice to:
- the harbour masters of ports whose users are in the opinion of the applicant likely to be affected by the application;
 - the sector office of the Maritime and Coastguard Agency which is responsible for operations in the waters in which the safety zone is proposed or located; and
 - the local office of the Marine and Fisheries Agency which is responsible for operations in the waters in which the safety zone is proposed or located.

1.5 Generation Assets Approach to Safety Zone Applications

- 1.5.1.1 Morgan OWL has submitted a Safety Zone Statement with its DCO application for the Morgan Offshore Wind Project: Generation Assets which confirms that it will apply to the Secretary of State for DESNZ post DCO award for safety zones, as required, during construction of the offshore infrastructure (i.e., wind turbine generators, offshore substation platforms, and inter-connector/array cables) included within that application.
- 1.5.1.2 Similarly, Morecambe OWL has submitted a Safety Zone Statement with its DCO application for the Morecambe Offshore Windfarm: Generation Assets which confirms that it will apply to the Secretary of State for DESNZ post DCO for safety zones as required during the construction of the offshore infrastructure (wind turbines, foundation structures, inter-array/platform link cables and offshore substation platforms) included within that application.
- 1.5.1.3 In accordance with Section 95 of the Energy Act 2004 and as set out in paragraphs 1.4.1.1 and 1.4.1.2 above, safety zone applications will be made separately by Morgan OWL and Morecambe OWL for their Generation Assets following completion of their relevant detailed design work, but prior to commencing construction of their Generation Assets. These safety zone applications will contain the information required by Schedule 16 of the Energy Act 2004 and Regulation 3 of the 2007 Regulations.

1.6 Transmission Assets Approach to Safety Zone Applications

- 1.6.1.1 The Transmission Assets offshore and intertidal cable installation works which will be the subject to the Safety Zone Applications (the ‘Offshore and Intertidal Cable Works’) (as set out at Section 1.2 above) only include the offshore export cables for each offshore wind farm and do not include any surface-piercing infrastructure such as wind turbine generators or offshore substation platforms. These works do not, therefore, by themselves, fall within the scope of the Energy Act 2004 as confirmed by paragraph 2.3 of the Guidance Notes.
- 1.6.1.2 However, whilst there is no legal obligation for the Applicants to make safety zone applications in respect of the offshore export cables alone, the Applicants have considered the practical implications of this infrastructure and have concluded that there is a need for exclusion zones on an advisory basis to be applied during construction and installation. The assessed need for these exclusion zones is set out in ES Volume 2, Chapter 7: Shipping and Navigation, Annex 7.1: Navigation Risk Assessment (document references F2.7 and F2.7.1), and the ES Volume 2, Chapter 6: Commercial Fisheries (document reference F2.6). The applications for the necessary exclusion zone(s) will therefore be made to the Secretary of State following completion of detailed design work post-consent.
- 1.6.1.3 During the construction phase, the Applicants will use advisory exclusion zones of 500m around vessels installing subtidal export cables. This will remove the need to completely close off the Offshore Order Limits.
- 1.6.1.4 The Applicants’ commitment to the use of advisory exclusion zones is set out in the Fisheries Liaison and Co-existence Plan (the outline of this plan being document reference J13) as secured within the deemed marine licences at Schedules 14 and 15 of the draft DCO, Condition 18(1)(f)(v) (document reference C1).
- 1.6.1.5 Temporary restrictions to fishing activity and/or anchoring will also be required in areas where full cable burial to target depth has not yet been achieved and/or surface-laid cable exists.
- 1.6.1.6 The Applicants will not be applying for safety zones around offshore export cables during the operational phase of the Transmission Assets.
- 1.6.1.7 A process for managing and communicating the use of exclusion zones will be developed post-consent and when sufficient information around detailed design is available and prior to the commencement of the offshore construction works. This will be presented via the detailed Fisheries Liaison and Co-Existence Plan(s).