

# Morecambe Offshore Windfarm: Generation Assets Examination Documents

#### Volume 9

Draft Statement of Common Ground with Isle of Man Territorial Seas Committee

Document Reference: 9.7





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#### **Glossary of Acronyms**

AFBI	Agri-Food and Biosciences Institute		
AfL	Agreement for Lease		
AIS	Automatic Identification System		
DCO	Development Consent Order		
DEFA	Department of Environment, Food and Agriculture		
EIA	Environmental Impact Assessment		
EPP	Evidence Plan Process		
ES	Environmental Statement		
ETG	Expert Topic Group		
FLCP	Fisheries Liaison and Co-existence Plan		
HAT	Highest Astronomical Tide		
IoM	Isle of Man		
IoMSPC	Isle of Man Steam Packet Company		
IPMP	In-Principle Monitoring Plan		
MCA	Maritime and Coastguard Agency		
MFPO	Manx Fish Producers Organisation		
MMMP	Marine Management Mitigation Protocol		
ММО	Marine Management Organisation		
MNEF	Marine Navigation Engagement Forum		
NRA	Navigation Risk Assessment		
OSP	Offshore Substation Platform		
PEIR	Preliminary Environmental Information Report		
PINS	Planning Inspectorate		
RIAA	Report to Inform Appropriate Assessment		
SoCG	Statement of Common Ground		
тн	Trinity House		
TSC	Territorial Sea Committee		
UK	United Kingdom		
WTG	Wind Turbine Generator		

#### **Glossary of Units**

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



### **Glossary of terms**

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 Windfarr This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cable offshore substation platform(s) (OSP(s)) and possible platform link cable to connect OSP(s).			
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.			
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.			



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# 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 Morecambe Offshore Windfarm was received in 2023.
- 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) with input from the Isle of Man (IoM) Territorial Sea Committee (TSC). 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'). This document is considered draft at this stage and the IoM TSC reserve the right to amend prior to the final submission deadline.
- 7. The need for a SoCG between the Applicant and the IoM TSC is set out in Section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23 September 2024. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 letter.
- 8. The IoM TSC is a cross-governmental committee which was set up to manage the IoM's interests following the purchase of the Territorial Sea (including

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hydrocarbon, coal and mineral rights) by the IoM Government from the UK Government in 1991. This draft SoCG has been structured to reflect topics of the DCO Application which are of interest to IoM TSC.

- 9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and IoM TSC 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 the IoM TSC. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and IoM TSC.
- 11. **Table 1.1** lists topics and documents of the Application which are of interest to the IoM TSC.

Topic/Chapter	Reference
Chapter 9 Benthic Ecology	APP-046
Chapter 10 Fish and Shellfish Ecology	APP-047
Chapter 11 Marine Mammals	APP-048
Chapter 12 Ornithology	APP-049
Chapter 13 Commercial Fisheries	APP-050
Chapter 14 Shipping and Navigation	APP-051
Chapter 16 Civil and Military Aviation and Radar	APP-053
Chapter 20 Socio Economics	APP-057
Report to Inform Appropriate Assessment (RIAA)	APP-027

Table 1.1	Topics	included	in	the	draft SoCG
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#### **1.3 Consultation**

#### **1.3.1 Pre-application**

- 12. The Applicant has engaged with the IoM TSC on the Project during the preapplication process, both in terms of informal non-statutory consultation and statutory consultation carried out, pursuant to Section 42 of the Planning Act 2008.
- 13. During the statutory consultation held between 19<sup>th</sup> April and 4<sup>th</sup> June 2023, pursuant to Section 42 of the Planning Act 2008, the IoM TSC provided comments on the PEIR by way of a letter dated 2<sup>nd</sup> June 2023. The Applicant



response to these comments is presented in the Consultation Report Appendices Part 4 (APP-019).

- 14. Consultation relevant to the IoM has included a number of stakeholders including the IoM Government, Department of Environment, Food and Agriculture (DEFA), Manx Fish Producers Organisation (MFPO), Ronaldsway Airport and the Isle of Man Steam Packet Company (IoMSPC). However, it should be noted that whilst there is overlap between the interest of the IoM TSC and external IoM stakeholders, this initial SoCG only represents the position of the IoM TSC and cannot represent the views of the IoMSPC or MFPO.
- 15. The IoM Government participated in the Evidence Plan Process (EPP) and targeted consultation was undertaken across technical topics as detailed in **Table 2.1**. These are detailed throughout the SoCG, and consultation including minutes of the Expert Topic Group (ETG) meetings are provided as Appendices to the Consultation Report (APP-016). Further information on the consultation process is provided in the Consultation Report (APP-015).

#### **1.3.2 Post-application**

- 16. Following the submission of the Application, meetings have been established with the IoM TSC and are detailed to date in **Table 2.1**.
- 17. The IoM TSC submitted a Relevant Representation (RR-031) in August 2024 that has been used to populate this draft SoCG.

# 1.3.3 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 2.3**.

Position status	Position colour coding
Agreed 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 IoM TSC 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

Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters



Position status	Position colour coding
<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 IoM TSC is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
In Discussion The matter is not agreed or agreed and is a matter where further discussion is required between parties.	In discussion

# 2 Statements of Common Ground

- 20. A summary of the consultation undertaken to date with the IoM TSC and the Applicant is set out below in **Table 2.1**.
- A summary of each of the topics and overall position is set out below in Table
   2.2, with details of the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and IoM TSC) in Table 2.3.

Date	Contact type	Owner	Торіс				
Pre-application							
Evidence Plan Proc	Evidence Plan Process						
23 November 2022	Online meeting	Applicant	Seabed ecology ETG 3				
15 June 2023	Online meeting	Applicant	Seabed ecology ETG 4				
9 November 2022	Online meeting	Applicant	Marine mammal ecology ETG 3				
8 June 2023	Online meeting	Applicant	Marine mammal ecology ETG 4				
11 October 2023	Online meeting	Applicant	Marine mammal ecology ETG 5				
7 June 2023	Online meeting	Applicant	Ornithology ETG 4				
12 October 2023	Online meeting	Applicant	Ornithology ETG 5				
Statutory consultat	ion on the PEIR						
2 June 2023	Letter	IoM TSC	Comments on the PEIR				
Shipping and navigation							
29 January 2021	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project and proposed future				

#### Table 2.1 Summary of consultation



Date	Contact type	Owner	Торіс
			engagement with the IoMSPC and IoM TSC.
7 February 2022	Online meeting	Applicant	Online meeting to provide an overview of the Scoping Report, key impacts to ferry operations and agree ways forward for Navigation Risk Assessment (NRA) methodology for the Project.
9 February 2022	Online meeting	Applicant	Online meeting to provide an overview of Scoping Report, key impacts and agree ways forward for NRA methodology for the Project.
6 May 2022	Marine Navigation Engagement Forum (MNEF) meeting	All Project Applicants	Online meeting to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
20 and 21 July 2022	Bridge simulations	Applicant	Bridge Simulation Preparations for the cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
9 August 2022	Online meeting	Applicant	Online meeting with ferry operators, Maritime and Coastguard Agency (MCA), Trinity House (TH) and Chamber of Shipping to provide an update on shipping and navigation project timeline and upcoming assessments. Also, to present ferry operator passage plans, alongside Automatic Identification System (AIS) data and refine understanding of passage planning and adverse weather routeing.
17 and 19 August 2022	Bridge simulations	Applicant	Bridge Simulations for the cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
10 October 2022	MNEF meeting	All Project Applicants	Online meetings to disseminate information regarding cumulative navigation



Date	Contact type	Owner	Торіс
			assessments and discuss any key navigation concerns.
12 October 2022	PEIR Hazard workshop	Applicant	Project site extent, squeezing of traffic, adverse weather routes, radar interference.
18 January 2023	MNEF meeting	All Project Applicants	Online meetings to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
2June 2023	PEIR response	Applicant	Concerns over cumulative safety issues.
13 to 15 September 2023	Bridge simulations	Applicant	Agreement of scope and scenarios for bridge simulations.
21 September 2023	MNEF meeting	All Project Applicants	Online meetings to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
29 September 2023	Hazard workshop	Applicant	Hazard workshop following Project site boundary change to inform NRA and Environmental Statement (ES).
11 December 2023	MNEF meeting	Applicant	Online meeting to provide project updates, including review of engagements and assessments, and cumulative impacts associated with the Mooir Vannin Offshore Wind Farm.
8 February 2024	MNEF meeting	All Project Applicants	Morgan, Mona and Morecambe Navigation Assessment updates – with focus on each ferry operator.
1 March 2024	Online meeting	Applicant	Online meeting with the IoMSPC to provide a Project update and to discuss any residual concerns.
Commercial fisher	ies		
25 October 2022	Meeting	Applicant	Meeting with the DEFA – Fisheries Division (IoM Government) and MFPO. Discussion around the Environmental Impact Assessment (EIA) and baseline data.



Date	Contact type	Owner	Торіс
23 November 2023	Meeting	Applicant	Meeting with the Fisheries Division (IoM Government). Discussion around data to be added to the ES in response to comments provided on the PEIR.
Post-application			
31 July 2024	Meeting	Applicant	Discussion on SoCG templates and process.
10 October 2024	Meeting	Applicant	Meeting following the submission of a draft SoCG.
7 November 2024	Meeting	Applicant	Meeting following the submission of a draft SoCG.



#### Table 2.2 Summary of agreements per topic

Торіс	Status
Chapter 9 Benthic Ecology	Agreed
Chapter 10 Fish and Shellfish Ecology	Agreed
Chapter 11 Marine Mammals	Agreed
Chapter 12 Offshore Ornithology	Agreed – noting residual concerns on GBBG
Chapter 13 Commercial Fisheries	Some points in discussion on cumulative effects
Chapter 14 Shipping and Navigation	Some points in discussion on cumulative effects
Chapter 16 Civil and Military Aviation and Radar	Some points in discussion on cumulative effects
Chapter 20 Socio-economics, Tourism and Recreation	Some points in discussion on cumulative effects
RIAA	Agreed



#### Table 2.3 Topics agreed, in discussion or not agreed with the IoM TSC

Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
EIA – Benthi	ic Ecology			
TSC 1	Assessment and conclusions regarding Manx interests	The Applicant has undertaken adequate consultation with the IoM TSC and assessments made in respect of benthic ecology in the ES are appropriate. No significant effects are identified relevant to the IoM waters in relation to be benthic ecology.	Agreed, the IoM TSC note the amendments made in the ES which have adequately covered the issues raised previously subject to no further concerns being raised by Marine Management Organisation (MMO) or Agri-Food and Biosciences Institute (AFBI).	Agreed
EIA – Fish a	nd Shellfish Ecology			
TSC 2	Assessment and conclusions regarding Manx interests	The Applicant has undertaken adequate consultation with the IoM TSC and assessments made in respect of fish and shellfish ecology in the ES are appropriate. No significant effects are identified relevant to the IoM waters in relation to fish and shellfish ecology.	Agreed, the IoM TSC note the amendments made in the ES which have adequately covered the issues raised previously subject to no further concerns being raised by MMO or AFBI.	Agreed
EIA – Marine	Mammals			
TSC 3	Assessment and conclusions regarding Manx interests	The Applicant has undertaken adequate consultation with the IoM TSC and assessments made in respect to marine mammal ecology in the ES are appropriate. No significant effects are identified relevant to the IoM waters in relation to marine mammal ecology.	Agreed, the IoM TSC note the additions regarding specific Manx issues and various amendments which have adequately covered the issues raised previously subject to no further concerns being raised by MMO or AFBI.	Agreed



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
TSC 4	Mitigations	The Applicant will develop the Marine Management Mitigation protocol (MMMP) and marine mammal mitigation, including an Underwater Noise Management Strategy, post- consent in consultation with nature conservation bodies.	The IoM TSC requests engagement by the Applicant during the development of the MMMP and marine mammal mitigation post-consent.	Agreed
EIA – Offsho	ore Ornithology			
TSC 5	Assessment and conclusions regarding Manx interests	The Applicant has undertaken adequate consultation and assessments made relevant to the IoM waters in the ES in respect of ornithology are appropriate.	Agreed.	Agreed
TSC 6	Mitigations	Appropriate mitigation has been identified relevant to the IoM in relation to ornithology.	The IoM TSC acknowledges that within the embedded mitigation, the air gap has been increased to 25m above Highest Astronomical Tide (HAT), which should have the effect of reducing the operational strike risk to many seabirds.	Agreed
TSC 7	Cumulative effects	Significant cumulative effects are identified for great black-backed gull, however the Project-alone contribution is low. Future projects would undertake a cumulative assessment in line with any upcoming applications.	The IoM TSC agree the contribution from the Project is low and there is limited scope for further mitigation. The IoM TSC note continued concern regarding the impact on great black-backed gull.	No Material Impact



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
RIAA				
TSC 8	Conclusions on designated sites relevant to the IoM	Ramsar sites relevant to the IoM are appropriately assessed within the RIAA with no Adverse Effects on Integrity identified.	Agreed.	Agreed
EIA – Comn	nercial Fisheries			
TSC 9	Consultation	The Applicant has undertaken adequate consultation with the IoM TSC on potential impacts on commercial fisheries.	Agreed, the developer has made good efforts to consult with the IoM Government on this receptor.	Agreed
TSC 10	EIA baseline	<ul> <li>Baseline information to support the EIA is adequate, noting landings statistics across a period of seven years (2016 to 2022) for all species have been considered, and a longerterm timeseries of 12 years (2011 to 2022) for queen scallop, which is identified as having cyclical landings on a seven to nine year period. Vessel monitoring system data has been analysed across a five-year period (2016 to 2020), with 2020 being the latest available period.</li> <li>The Applicant intends to update Chapter 13 Commercial Fisheries and the baseline technical report (Appendix 13.1) to provide for Deadline 2 further information as requested.</li> </ul>	There remains some lack of consistency between Chapter 13 Commercial Fisheries and the baseline technical report (Appendix 13.1) that will be discussed with the Applicant to ensure accuracy of the record, and also to ensure that the conclusions of the EIA are accurate. IoM Government retains some concerns about the scope (number of years and period) and type of fishing activity data used to characterise the baseline of regional fisheries. Factors such as Covid, Brexit and cyclical patterns of particular species are acknowledged, but apparently not consistently or fully considered. The IoM TSC have provided the Applicant with further information and will review updates that will be provided at Deadline 2.	In discussion



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
TSC 11	EIA conclusions Project- alone	With mitigation in place, no significant effects in relation to commercial fisheries and IoM fisheries have been identified, with the Project outside of key scallop grounds.	Agreed, the IoM TSC note residual concerns are in relation to cumulative effects.	Agreed
TSC 12	EIA conclusions cumulative	In relation to cumulative impacts moderate significant cumulative effects during the construction and decommissioning phases for the UK and IoM dredge and demersal otter trawl (scallop) fishery, and the UK and IoM potting fleets related to reduction in access and/or displacement impacts are identified when considering all potential plans and projects.	Agreed, the IoM TSC note the significant cumulative effects identified.	Agreed
TSC 13	Mitigation and monitoring	Acknowledging the low contribution to cumulative effects from the Project in the wider Irish Sea mitigation in the form of the Fisheries Liaison and Co- existence Plan (FLCP) is appropriate, alongside commitments to monitoring as outlined in the IPMP (APP-148).	The IoM TSC acknowledge the low contribution made by the Project and the mitigation and monitoring offered. Further discussion on cumulative effects are being undertaken with the Applicant. The IoM TSC is further considering the information provided in the DCO Application.	In discussion
EIA – Landso	cape and Visual			
TSC 14	Assessment and conclusions regarding Manx interests	The Applicant has adequately considered potential visual effects from the IoM with no significant effects identified.	Agreed.	Agreed



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
EIA – Shipp	ing and Navigation			
TSC 15	Consultation	The Applicant has undertaken adequate consultation in regard to shipping and navigation.	Agreed.	Agreed
TSC 16	Project-alone EIA impacts	The Project-alone does not impact the Douglas to Heysham ferry route and has minimal impacts on the Liverpool to Douglas ferry route with no increase to transit times.	Agreed	Agreed
TSC 17	Project-alone EIA impacts	The Project-alone would not have significant effects on lifeline ferry services and all Project-alone effects on ferry services are not considered to have significant operational impacts.	Agreed	Agreed
TSC 18	Cumulative EIA impacts	The Project has minimal contribution to any significant cumulative impacts on ferry services, with impacts being driven by other cumulative projects.	It is acknowledged that the Project has minimal contribution to cumulative effects. The IoM TSC is further considering the information provided in the DCO Application.	In discussion
TSC 19	Mitigation	The mitigation measures described within Chapter 14 Shipping and Navigation (APP-051) and NRA (APP-073) are appropriate.	It is acknowledged that the Project has a minimal contribution to cumulative effects. The IoM TSC is further considering the information provided in the DCO Application.	In discussion



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
EIA – Socio-	economics			
TSC 20	EIA conclusions Project- alone	No significant additional IoM ferry routeing would result from the Project-alone and there are no identified significant effects in relation to associated socio economics and human health. Due consideration is given within the DCO Application.	The IoM TSC note the minimal impacts the Project-alone would have on ferry routes and associated socio-economic effects.	Agreed
TSC 21	EIA conclusions cumulative	The Project does not derive any significant effects on IoM ferry routeing and no associated socio economics and human health effects have been identified. Due consideration is given within the DCO application.	The IoM TSC note the IoM is entirely reliant on 'just in time' deliveries, which are likely to be re-directed elsewhere, potentially leading to supply issues. However, it is acknowledged that the Project has minimal contribution to cumulative effects. The IoM TSC is further considering the information provided in the DCO Application.	In discussion
EIA - Civil ar	d Military Aviation and Rac	lar		•
TSC 22	EIA conclusions cumulative	The Applicant acknowledges continued engagement with the Isle of Man Airport in relation to potential cumulative effects on radar processing capacity, as appropriate.	Ronaldsway Airport are undertaking a surveillance strategy to manage air traffic safeguarding which includes consideration of the Morecambe Offshore Wind Project and any potential mitigation requirements. The results of this strategy are anticipated to be shared with the Applicant shortly. Following this, the applicant will engage with Ronaldsway Airport on any next steps	In discussion



Topic/ref.	Discussion point	Applicants position	IoM TSC's position	Position summary
			and will update the Examining Authority at the next available opportunity.	



# 3 Signatures

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

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the lo	oM TSC
Signed:	
Signed: Print Name:	
Print Name:	



## 4 References

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

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

MCA (2021). MGN 654 Annex 1: Methodology for Assessing the Marine Navigational Safety and Emergency Response Risks of Offshore Renewable Energy Installations (OREI).

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

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

Morecambe Offshore Windfarm Ltd (2024) Chapter 9 Benthic Ecology (APP-046)

Morecambe Offshore Windfarm Ltd (2024) Chapter 10 Fish and Shellfish Ecology (APP-047)

Morecambe Offshore Windfarm Ltd (2024) Chapter 11 Marine Mammals (APP-048)

Morecambe Offshore Windfarm Ltd (2024) Chapter 12 Ornithology (APP-049)

Morecambe Offshore Windfarm Ltd (2024) Chapter 13 Commercial Fisheries (APP-049)

Morecambe Offshore Windfarm Ltd (2024) Chapter 14 Shipping and Navigation (APP-050)

Morecambe Offshore Windfarm Ltd (2024) Chapter 16 Civil and Military Aviation and Radar (APP-051)

Morecambe Offshore Windfarm Ltd (2024) Chapter 16 Civil and Military Aviation and Radar (APP-053)

Morecambe Offshore Windfarm Ltd (2024) Chapter 20 Socio Economics (APP-057)

Morecambe Offshore Windfarm Ltd (2024) Report to Inform Appropriate Assessment (APP-027)