



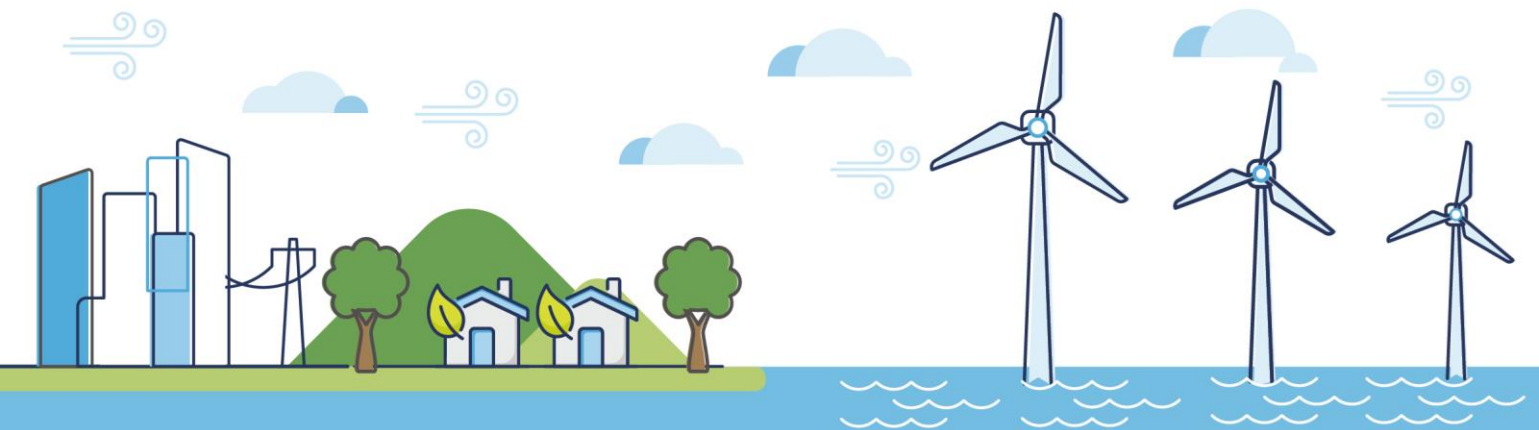
# Morecambe Offshore Windfarm: Generation Assets Examination Documents

## Volume 9

### Draft Statement of Common Ground with BAE Systems (Operations) Ltd and Defence Infrastructure Organisation

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## Document History

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## Glossary of Acronyms

AfL	Agreement for Lease
DCO	Development Consent Order
DIO	Defence Infrastructure Organisation
EIA	Environmental Impact Assessment
ES	Environmental Statement
IFP	Instrument Flight Procedure
MNEF	Marine Navigation Engagement Forum
MOD	Ministry of Defence
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PSR	Primary Surveillance Radar
RLoS	Radar Line of Sight
SMEs	Subject Matter Experts
SoCG	Statement of Common Ground
WTG	Wind Turbine Generator

## Glossary of Units

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

## 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.
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# The future of renewable energy

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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 Project 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') with input from Defence Infrastructure Organisation (DIO) and BAE Systems (Operations) Ltd. 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 ('the Application') for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. The need for a SoCG between the Applicant, BAE Systems (Operations) Ltd and the DIO is set out in section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23<sup>rd</sup> September and in section 3 of Annex B of the Rule 8 letter issued on the 30<sup>th</sup> October. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 and Rule 8 letters.



8. This draft SoCG has been structured to reflect topics of the Application which are of interest to DIO and BAE Systems (Operations) Ltd, which fall under their statutory remit. The DIO represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. The elements of the Project which may affect the interests of DIO and BAE Systems (Operations) Ltd relate to offshore works. These are detailed in the Draft DCO (APP-012).
9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and DIO/ BAE Systems (Operations) Ltd 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 DIO/ BAE Systems (Operations) Ltd. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and DIO/ BAE Systems (Operations) Ltd.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to DIO and BAE Systems (Operations) Ltd.

*Table 1.1 Topics included in the draft SoCG*

Topic/Chapter	PINS Reference
Draft DCO	APP-012
Chapter 16 Civil and Military Aviation and Radar	APP-053
Appendix 16.1 Airspace Analysis and Radar Modelling	APP-078
Appendix 16.2 Other Instrument Flight Procedure Assessments	APP-080

12. Further details of this topic and relevant consultation held pre-application can be found in the Consultation Report (APP-015) and summarised below.

## 1.3 Consultation

### 1.3.1 Pre-application

13. The Applicant had engaged with the MOD through the DIO safeguarding team 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. As part of our extensive regional shipping and navigation engagement, the MOD were also invited to attend the Marine

Navigation Engagement Forum (MNEF) as described in **Table 2.1**, in coordination with the Mona Offshore Wind Project and Morgan Offshore Wind Project.

14. The MOD provided comments on the PEIR on 21<sup>st</sup> June 2023 as part of the statutory consultation process. The Applicant had regard to the comments and is presented in Volume 4 - Consultation Report Appendices Part 4 (I) (APP-019). Further detail on engagement undertaken with the DIO and MOD is presented in **Table 2.1**.

### 1.3.2 Post-application

15. DIO and BAE Systems (Operations) Ltd submitted separate Relevant Representations (RR-021 and RR-006) in August 2024.
16. The Applicant is committed to ongoing post-application engagement with DIO as described to date in **Table 2.1**. The DIO has subsequently liaised with BAE Systems (Operations) Ltd to ensure positions are aligned within this SoCG.

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

17. 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.
18. 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 DIO/ BAE Systems (Operations) Ltd 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 DIO/ BAE Systems (Operations) Ltd is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
<b>In Discussion</b> The matter is neither ‘agreed’ or ‘not agreed’ and is a matter where further discussion is required between parties, for	In Discussion

Position status	Position colour coding
example, final wording of DCO conditions or where further information sharing/clarification is required.	

## 2 Statements of Common Ground

19. A summary of the consultation undertaken to date with the DIO is set out in **Table 2.1**. The matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and the DIO during the pre-application phase) are set out in **Table 2.2**.

*Table 2.1 Summary of consultation*

Date	Contact type	Owner	Topic
<b>Pre-application</b>			
9 March 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.
31 March 2022	Email	MOD	Pre-application advice provided from MOD.
6 May 2022	MNEF	Applicant	Online meeting to discuss navigation safety, cumulative assessments with the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets and development of the CRNRA.
10 October 2022	MNEF	Applicant	Online meeting to discuss navigation safety and cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
29 November 2022	Email	Applicant	Email to seek clarification on highly surveyed routes identified in the MOD pre-application advice.
23 December 2022	Email	MOD	Email with clarification that there are no highly surveyed routes identified in the windfarm site.
18 January 2023	MNEF	Applicant	Online meeting to discuss navigation safety and cumulative assessments with the Project, Mona Offshore Wind Project and

Date	Contact type	Owner	Topic
			Morgan Offshore Wind Project Generation Assets pre- PEIR.
27 July 2023	Phone Call	Applicant	Initial phone call to discuss MOD assessment of potential impacts including Warton and Woodvale IFPs.
10 August 2023	Email	MOD	Email to MOD to request clarification of MOD position regarding Warton and Woodvale IFPs and to confirm no impact on Warton Air Traffic Control (ATC) radar.
11 August 2023	Email	MOD	Email response from MOD confirming no operational impact on Warton ATC radar. Return email sent to MOD requesting clarification on IFP assessments.
24 August 2023	Email	Applicant	MOD response to email dated 11 August 2023 saying that this query is still ongoing and will respond in due course. No response received.
21 September 2023	MNEF	Applicant	Online meeting to provide project updates and review of site boundary changes made since PEIR by the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
8 February 2024	MNEF	Applicant	Online meeting to provide Project updates.
9 February 2024	Email	Applicant	Email consultation providing MOD with finalised Osprey IFP assessment for review and consideration.
8 April 2024	Email	Applicant	Email requesting response to consultation email sent on 9 February 2024.
18 April 2024	Phone Call	Applicant	Phone call with MOD to discuss potential impact on Warton and RAF Valley IFPs.
<b>Post-application</b>			
17 and 23 September 2024	Email	Applicant	Email to request meeting to discuss the issues raised within their Relevant Representation.

Date	Contact type	Owner	Topic
8 October 2024	Online meeting	Applicant	Meeting to discuss relevant Representation and SoCG.
28 October 2024	Online meeting	Applicant	Online meeting to discuss and progress SoCG.
18 November 2024	Online meeting	Applicant	Online meeting to discuss and progress SoCG.

Table 2.2 Topics agreed, in discussion or not agreed with BAE Systems (Operations) Ltd and DIO in relation to civil and military aviation and radar

Topic/ref.	Discussion Point	Applicants position	BAE System (Operations) Ltd and DIO position summary	DIO's position
<b>Environmental Impact Assessment (EIA) Aviation and Radar</b>				
DIO 1	Consultation	The Applicant has undertaken adequate consultation with the DIO on potential impacts on aviation and radar.	Agreed	Agreed
DIO 2		The EIA has had due regard to matters raised by the DIO through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed	Agreed
DIO 3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within DIO's remit.	Agreed	Agreed
DIO 4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar.	Agreed	Agreed
DIO 5	Scoping	Agreement to the scoping of impacts for the EIA for aviation and radar.	Agreed	Agreed
DIO 6	Study area	The aviation and radar study area is appropriate for the receptors, sites and impacts assessed.	Agreed	Agreed
DIO 7	Project design envelope	Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053) has identified, described and assessed the maximum design scenario for the EIA.	Agreed	Agreed
DIO 8		The aviation and radar receptors identified have been correctly assessed and sufficiently	Agreed	Agreed

Topic/ref.	Discussion Point	Applicants position	BAE System (Operations) Ltd and DIO position summary	DIO's position
	Assessment methodology	described within Volume 5, Chapter 16 Aviation and Radar (APP-053).		
DIO 9		The list of projects screened into the Cumulative Effects Assessment (CEA) in Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053).	Agreed	Agreed
DIO 10	Assessment of the effects from the Project alone - physical obstruction	The development proposed has the potential to impact on aviation safety by introducing a physical obstruction to aircraft during the construction, operation and maintenance, and decommissioning phases. This impact is acknowledged in Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053).	Agreed. The applicant has acknowledged that the development has the potential to impact military aviation safety due to the heights of the WTG's causing a physical obstruction. Requirements (3 & 7) to address this harm has been included at Schedule 2 within the draft DCO.	Agreed
DIO 11	Instrument Flight Procedure (IFP) Mitigation	Effects to Warton IFP are addressed (if required) by Requirement 7 within Schedule 2 of the draft Development Consent Order.	Agreed. BAE have confirmed Warton's IFP's will be affected by this development and a Requirement for the submission of an IFP scheme to address this impact will be necessary. The wording of the Requirement is acceptable, no changes are required apart from the reference to RAF Valley. An IFP scheme is only required to be submitted for BAE	Agreed

Topic/ref.	Discussion Point	Applicants position	BAE System (Operations) Ltd and DIO position summary	DIO's position
			Warton, reference to RAF Valley can be removed from the Requirement wording.	
DIO 12	Assessment of the effects from the Project alone - radar	The impact assessment initially predicted a potential effect on the Primary Surveillance Radar (PSR) at Warton Aerodrome, as set out in Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053). However, due to DIO not raising a concern against effects on Warton Aerodrome in response to the statutory consultation on the PEIR, the Applicant did not include mitigation for radar impacts for Warton Aerodrome in APP-053. The Applicant continued to engage with the DIO seeking confirmation of no potential effects to the PSR. Confirmation was received on 11 <sup>th</sup> August 2023 that an operational assessment had been completed and although the development would be in Radar Line of Sight (RLoS), MOD Subject Matter Experts (SMEs) had concluded no operational impact. However, based on the latest position of DIO set out in their Relevant Representation, the Applicant understands there may potentially be significant effects on the PSR at Warton Aerodrome.	Agreed. Changes to the MOD position throughout the applicant's engagement with DIO acknowledged. I can confirm that the MOD's latest position to PINS, dated 19/08/24 is correct, that the WTG's will be RLoS to the Warton Aerodrome PSR. Once operational, the development as proposed, would cause unacceptable and unmanageable interference to the effective operation of the PSR deployed at Warton Aerodrome. This impact will need to be mitigated. It is the Applicant's responsibility to provide a suitable technical mitigation solution to address this harm to DIO.	Agreed
DIO 13	Radar Mitigation	The parties are engaging on the nature of the mitigation potentially required. Warton Aerodrome are in the process of implementing a new PSR at Warton Aerodrome which is	In discussion. Confirm that the Applicants position aligns with that of the MOD. Discussion of mitigation is	In discussion



Topic/ref.	Discussion Point	Applicants position	BAE System (Operations) Ltd and DIO position summary	DIO's position
		<p>expected to be online by the end of 2024 subject to site acceptance and flight trials.</p> <p>The parties will provide updates through subsequent SoCG through examination.</p> <p>Discussions around proposed radar mitigation are to be progressed with the DIO and BAE Systems (Operations) Ltd after Deadline 1.</p>	<p>ongoing as set out in the Applicant's position.</p> <p>The current MOD objection must remain in place until a technical mitigation proposal is submitted to the MOD (through the DIO Safeguarding team), and technical and operational assessments have been completed and the proposal accepted by the MOD. It is at this stage, that the MOD can look to agree the wording relating to a Requirement for Warton aerodrome PSR mitigation.</p>	
DIO 14	Assessment of the effects from the Project cumulatively with other projects	<p>Predicted impacts from the Project alongside other plans and projects on aviation and radar have been identified with mitigation discussed above suitable to mitigate effects from the Project.</p> <p>Discussions around proposed mitigation are to be progressed with the DIO and BAE Systems (Operations) Ltd after Deadline 1.</p>	<p>In discussion. Applicant has identified cumulative effects within Chapter 16 of the Environment Statement - Civil and Military Aviation Radar, at section 16.7.</p> <p>As above, mitigation is unknown at this stage, with engagement ongoing between parties on what mitigation will be required.</p>	In discussion

### 3 Signatures

20. The above draft SoCG is agreed between DIO/ BAE Systems (Operations) Ltd and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of DIO/ BAE Systems (Operations) Ltd	
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)

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

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

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

Morecambe Offshore Windfarm Ltd (2024) - Appendix 16.1 Airspace Analysis and Radar Modelling (APP-078)