



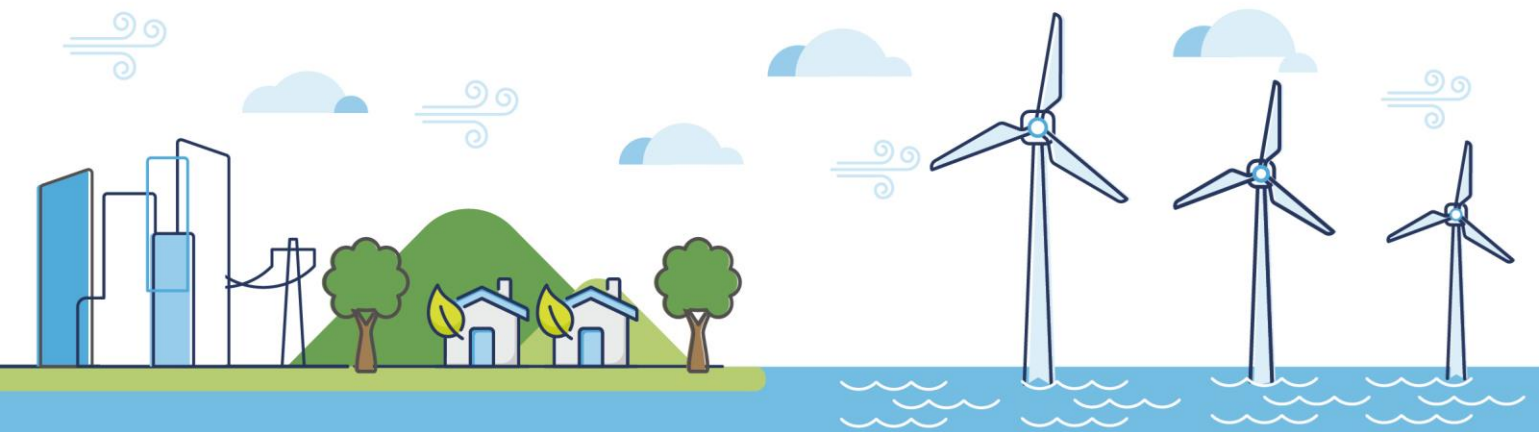
Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with BAE Systems Marine Limited

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Contents

1	Introduction	8
1.1	Overview of the Project	8
1.2	Purpose of this document.....	8
1.3	Consultation	10
1.3.1	Pre-application	10
1.3.2	Post-application.....	10
1.3.3	Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters.....	10
2	Statements of Common Ground.....	11
3	Signatures	19
4	References.....	20

Tables

Table 1.1 Topics included in the draft SoCG	9
Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters.....	10
Table 2.1 Summary of consultation	11
Table 2.2 Topics agreed, in discussion or not agreed with BAE Systems Marine Limited.....	14

Glossary of Acronyms

AfL	Agreement for Lease
APDO	Approved Procedure Design Organisation
ATS	Air Traffic Services
CAA	Civil Aviation Authority
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
IFP	Instrument Flight Procedure
MATS	Manager Air Traffic Services
MGN	Marine Guidance Note
MNEF	Marine Navigation Engagement Forum
MOD	Ministry of Defence
NATS	National Air Traffic Services
OSP	Offshore Substation Platform
PINS	Planning Inspectorate
PEIR	Preliminary Environmental Information Report
SATCO	Senior Air Traffic Control Officer
SoCG	Statement of Common Ground
UK	United Kingdom
VHF	Very High Frequency
WTG	Wind Turbine Generator

Glossary of Units

MW	Megawatt
km ²	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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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 125km² 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 87km².
4. The 'Project' relates 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 BAE Systems Marine Limited in relation to Walney Aerodrome. 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 and BAE Systems Marine Limited is set out in section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23rd September. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 letter.
8. The remit of BAE Systems Marine Limited includes ensuring the safe, secure, and efficient operation of air traffic to and from the aerodrome. This involves managing airspace, coordinating with Air Traffic Services (ATS), and adhering

to aviation standards and regulations. BAE Systems Marine Limited is also responsible for assessing any potential impacts on navigation aids, communication networks, and overall flight safety that may arise from developments or activities within its operational area. BAE Systems Marine Limited's main base is in Barrow-in-Furness. BAE Systems Marine Limited designs, builds, tests, and commissions the most advanced submarines ever operated by the Royal Navy as well as their state-of-the-art combat systems and equipment.

9. This draft SoCG has been structured to reflect topics of the Application which are of interest to BAE Systems Marine Limited in relation to Walney Aerodrome and which fall under the statutory remit of BAE Systems Marine Limited.
10. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and BAE Systems Marine Limited to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
11. Throughout the draft SoCG the phrase 'Agreed' identifies any point of agreement between the Applicant and BAE Systems Marine Limited. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and BAE Systems Marine Limited.
12. **Table 1.1** lists topics and documents of the Application which are of key interest to BAE Systems Marine Limited.

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 16.2 Other Instrument Flight Procedure Assessments	APP-080
Chapter 14 Shipping and Navigation	APP-051
Appendix 14.1 Navigation Risk Assessment	APP-073

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

1.3 Consultation

1.3.1 Pre-application

14. Following the publication of the Preliminary Environmental Information Report (PEIR), the Applicant engaged directly with BAE Systems Marine Limited, through the Manager Air Traffic Services (MATS) Walney Aerodrome, on the Project's initial assessments. Following a request from the BAE Systems Marine Limited, the Applicant has also commissioned National Air Traffic Services (NATS) to carry out an IFP assessment on behalf of BAE Systems Marine Limited and Walney Aerodrome.
15. Further detail on engagement undertaken with BAE Systems Marine Limited is presented in **Table 2.1**.

1.3.2 Post-application

16. The Applicant is committed to ongoing post-application engagement with BAE Systems Marine Limited as described to date in **Table 2.1**

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
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or BAE Systems Marine Limited 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
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the BAE Systems Marine Limited is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact

Position status	Position colour coding
In Discussion The matter is neither 'agreed' or 'not agreed' and is a matter where further discussion is required between parties, for example, final wording of DCO conditions or where further information sharing/clarification is required.	In Discussion

2 Statements of Common Ground

19. A summary of the consultation undertaken to date with BAE Systems Marine Limited 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 BAE Systems Marine Limited during the pre-application phase) are set out in **Table 2.2**.

Table 2.1 Summary of consultation

Date	Contact type	Owner	Topic
Pre-application			
19 April 2023	Email	Applicant	Notification sent to BAE Systems Marine Limited to participate in the statutory consultation and provide comment on the Preliminary Environmental Information Report (PEIR).
2 August 2023	Email	Applicant	Introductory email to the Project (sent to MATS Walney Aerodrome) and request for initial phone call to discuss potential impact on Barrow/Walney Airport operations.
2 August 2023	Email	Applicant	Follow-up phone call (with MATS Walney Aerodrome) to discuss Instrument Flight Procedure (IFP) assessment process for Walney Aerodrome. National Air Traffic Services (NATS) are the airport's Approved Procedure Design Organisation (APDO). At the time, the Applicant understood could potentially appoint another APDO, if required. Noted that NATS (through the airport) would be

Date	Contact type	Owner	Topic
			required to assess the validity of other APDO's assessment.
9 February 2024	Email	Applicant	Email providing Walney Aerodrome with finalised Osprey IFP assessment for review and consideration. Response requested by 22 February 2024.
20 February 2024.	Email	Applicant	Email response to Walney Aerodrome following questions on Osprey IFP assessment.
7 March to 2 May 2024	Email	Applicant	Emails and phone messages to Walney Aerodrome requesting timeline for response on Osprey IFP assessment. No responses received.
16 May 2024	Phone/Email	Applicant	Phone call with Walney Aerodrome. Discussed awaited response on Osprey IFP assessment.
23 May 2024	Phone/Email	Applicant	Follow-up email regarding awaited response on Osprey IFP assessment.
30 May 2024	Email	Applicant	Response from Walney Aerodrome regarding Osprey IFP assessment. Advised that further assessment required by NATS Procedure Design team.
Post-application			
29 July 2024	Email	Applicant	Correspondence with NATS Procedure Design team regarding IFP assessment for Walney Aerodrome Advised that IFP assessment will be completed by end November 2024.
17 September 2024	Email	Applicant	Email to request meeting to discuss the issues raised within their Relevant Representation.
10 October 2024	Online meeting	Applicant	Meeting to discuss concerns raised within their Relevant Representation and progress SoCG.
21 November 2024	Blended meeting	Applicant	Meeting to discuss concerns raised within their Relevant Representation and progress SoCG.

Date	Contact type	Owner	Topic
12 December 2024	Blended meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
9 January 2025	Blended meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
31 January 2025	Blended meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
14 February 2025	Blended meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.

Table 2.2 Topics agreed, in discussion or not agreed with BAE Systems Marine Limited

Topic/ref.	Discussion Point	Applicants position	BAE Systems Marine Limited position	Position summary
Environmental Impact Assessment (EIA)				
BAE 1	Consultation	The Applicant has undertaken adequate consultation on potential impacts in relation to Barrow/Walney Island Aerodrome to date.	It is noted that pre application engagement was carried out in relation to the IFP assessment undertaken by the Applicant and this identified that NATS would also need to undertake the IFP assessment on behalf of BAE Systems Marine Limited and Walney Aerodrome which is underway.	Agreed
BAE 2		The Applicant has engaged in appropriate consultation with BAE Systems Marine Limited following receipt of Relevant Representations.	It is understood that the Applicant engaged with the MOD and AB Ports (operator of Port of Barrow in Furness) pre-application and that post application engagement has been made directly with BAE Systems Marine Limited to discuss the potential for effects at Walney Aerodrome.	Agreed
BAE 3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within BAE Systems Marine Limited's remit.	Agreed	Agreed
BAE 4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar.	Agreed	Agreed
BAE 5	Scoping	Agreement to the scoping of impacts for the EIA for aviation and radar.	Agreed	Agreed
BAE 6	Study area	The aviation and radar study area is appropriate for the receptors, sites and impacts assessed.	Agreed	Agreed

Topic/ref.	Discussion Point	Applicants position	BAE Systems Marine Limited position	Position summary
BAE 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
BAE 8	Assessment methodology	The sensitivity of aviation and radar receptors has been correctly identified and sufficiently described within Volume 5, Chapter 16: Aviation and radar (APP-053).	Agreed	Agreed
BAE 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
BAE 10	Assessment of the effects from the project alone regarding aviation and radar	Predicted impacts from the Project alone on Walney Aerodrome Instrument Flight Procedures (IFPs) have been correctly identified and assessed within Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053).	The impact is identified and assessed, however BAE Systems Marine Limited also require an IFP assessment to be carried out by NATS as the relevant APDO on behalf of BAE Systems Marine Limited and Walney Aerodrome	Agreed
BAE 11	Assessment of the effects from the project cumulatively with other projects	Predicted impacts from the Project alongside other plans and projects on aviation and radar have been correctly identified and assessed within Volume 5, Chapter 16 Civil and Military Aviation and Radar (APP-053).	The impact is identified and assessed; however BAE Systems Marine Limited require an assessment to also be carried out by NATS as the relevant APDO on behalf of BAE Systems Marine Limited and Walney Aerodrome.	Agreed
BAE 12	Very High Frequency (VHF) radio communications	Following the submission of the Application, BAE Systems Marine Limited have identified potential effects to VHF radio communications between low flying aircraft and Walney Aerodrome.	It has been identified to BAE Systems Marine Limited by the Civil Aviation Authority (CAA) of potential effects to VHF radio communications. The CAA have requested an assessment must be undertaken to understand potential effects.	In discussion

Topic/ref.	Discussion Point	Applicants position	BAE Systems Marine Limited position	Position summary
		<p>The Applicant has commissioned from qualified aviation consultancies to conduct the required VHF and DF communications assessments for Walney Aerodrome.</p> <p>The Applicant notes BAE Systems Marine Limited have since requested for a cumulative assessment to also be undertaken.</p> <p>Subject to the outcome of the project-alone assessment, the Applicant may look to commission a cumulative impact assessment on VHF communications.</p> <p>In the event that mitigation for VHF communication is required, this is secured within a draft DCO requirement.</p>	<p>BAE System Marine Limited are awaiting on the project-alone VHF communications assessment, which will then be reviewed. Subject to the outcome of the project-alone assessment, BAE Systems Marine Limited may require a cumulative assessment would be undertaken to include the existing Orsted windfarm projects and Round 4 developments.</p> <p>In the event that mitigation for VHF communication is required, this is secured within a draft DCO requirement.</p>	
BAE 13	Assessment of the effects from the Project	The Applicant has made necessary arrangements for NATS to carry out an IFP assessment for Walney Aerodrome	Agreed	Agreed
BAE 14	Mitigation - programme	The Applicant is discussing mitigation solutions with BAE Systems Marine Limited and requirement for inclusion in the draft DCO to secure the mitigation.	The NATS IFP assessment undertaken on behalf of BAE Systems Marine Limited and Walney Aerodrome has now been received and the mitigation solutions proposed in the report are accepted for implementation prior to construction of any above sea level infrastructure.	Agreed

Topic/ref.	Discussion Point	Applicants position	BAE Systems Marine Limited position	Position summary
BAE 15	Mitigation – process	<p>Pending delivery of the NATS IFP assessment, the Applicant has engaged with BAE Systems Marine Limited to understand the process for amending IFP procedures and gaining approval from the CAA for implemented revised procedures.</p> <p>Discussion of process for amending the IFP and approval from the CAA will continue with BAE Systems Marine Limited post-consent.</p>	The NATS IFP assessment undertaken on behalf of BAE Systems Marine Limited and Walney Aerodrome has now been received and the mitigation solutions proposed in the report are accepted for implementation prior to construction of any above sea level infrastructure. This will include discussion of process for amending the IFP and approval from the CAA, which will continue post-consent.	Agreed
BAE 16	Mitigation	The technical mitigation solutions proposed by the Applicant in respect of IFP for Walney Aerodrome have been developed and proven suitable at other aerodromes.	Agreed. BAE Systems Marine Limited notes that a requirement for the technical mitigation solutions will be secured within a draft DCO requirement.	Agreed
BAE 17	Mitigation	The required mitigation for IFP at Walney Aerodrome is realistically achievable within the time limit for implementation of the DCO (anticipated to be a minimum of 5.5 years from conclusion of the examination) and therefore accords with paras. 5.5.50 and 5.5.57 of NPS EN-1.	Agreed. BAE Systems Marine Limited notes that a requirement for the technical mitigation solutions will be secured within a draft DCO requirement.	Agreed
BAE 18	Assessment of the effects from the Project regarding nautical impacts	The Applicant has engaged with the MOD who provided feedback on the potential effects on its operations. As set out in APP-05, the correspondence with the MOD stated that the Project does not intersect any highly surveyed routes.	BAE Systems Marine Limited have held internal discussions and can confirm no impact to boat exit through the Walney Channel.	Agreed

Topic/ref.	Discussion Point	Applicants position	BAE Systems Marine Limited position	Position summary
		<p>Additionally, the MOD attended subsequent Marine Navigation Engagement Forum (MNEF), to discuss potential risk to vessels and no further concerns have been raised by the MOD.</p> <p>ABP (operator of Port of Barrow in Furness) were consulted during a Project Update Meeting with Ports on 10th March 2022 and during the MNEF meeting held in May 2022. They were additionally invited to subsequent MNEF meetings. Comments were made on the potential impacts to radar, freight, cargo and passenger services but no reference was made to nautical paths.</p> <p>This is outlined in Chapter 14 - Shipping and Navigation (APP-051) and Appendix 14.1 - Navigation Risk Assessment (APP-073).</p> <p>The Applicant understands BAE Systems Marine Limited have held internal discussions and can confirm no impact to boat exit through the Walney Channel.</p>		
BAE 19	DCO wording	Appropriate wording is provided in the draft DCO, to be submitted at Deadline 4.	BAE Systems Marine Ltd will provide feedback to the wording within the draft DCO once shared by the Applicant	In discussion

3 Signatures

20. The above draft SoCG is agreed between BAE Systems Marine Limited and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of BAE Systems Marine Limited	
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) Chapter 14 Shipping and Navigation (APP-051)

Morecambe Offshore Windfarm Ltd (2024) Appendix 14.1 Navigation Risk Assessment (APP-073)

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

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

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