

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and Isle of Man Airport (Ronaldsway)

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Deemed Marine Licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process.
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
ATC	Air Traffic Control
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IFP	Instrument Flight Procedure
LoS	Line of Sight
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

Units

Unit	Description
m	Metres
nm	Nautical mile

1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND IOM AIRPORT (RONALDSWAY)

1.1 Introduction

1.1.1 Overview

1.1.1.1 This initial Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and Isle of Man (IoM) Airport (Ronaldsway), hereafter referred together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the Development Consent Order (DCO) application for the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the ‘Morgan Generation Assets’).

1.1.1.2 The need for a SoCG between the Applicant and IoM Airport (Ronaldsway) is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 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 IoM Airport (Ronaldsway)’s Remit

1.1.2.1 The remit of the Isle of Man Airport (Ronaldsway) includes ensuring the safe, secure, and efficient operation of air traffic to and from the Isle of Man. This involves managing airspace, coordinating with air traffic control (ATC) services, and adhering to international aviation standards and regulations. The airport is also responsible for assessing and mitigating any potential impacts on radar systems, communication networks, and overall flight safety that may arise from developments or activities within its operational area.

1.1.2.2 The elements of the Morgan Generation Assets which may affect the interests of IoM Airport (Ronaldsway) are detailed in Schedule 1 (Authorised Development), Part 1 (Authorised Development) of the Draft DCO (AS-003).

1.1.2.3 This SoCG covers the following topics of relevance to IoM Airport (Ronaldsway):

- Assessment of effects to civil aviation and proposed mitigation.
- VHF communications and navigation aids.

1.1.3 Overview of Morgan Generation Assets

1.1.3.1 The 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:

- 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.

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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 IoM Airport (Ronaldsway) within its response to Scoping, Section 42 consultation and as raised through the pre-application consultation process. This SoCG also includes those issues raised by IoM Airport (Ronaldsway) 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 phases of the Morgan Generation Assets. The agreement logs present the position reached on 03 October 2024 (Deadline 1).

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.

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

Topic	Agreement status
Assessment of effects to civil aviation and proposed mitigation	Ongoing point of discussion
VHF communications and navigation aids	Ongoing point of discussion

1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with IoM Airport (Ronaldsway) during the pre-application phase of the Morgan Generation Assets.

1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicant with IoM Airport (Ronaldsway) during the post-application phase of the Morgan Generation Assets.

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Table 1.2: Summary of pre-application consultation with IoM Airport (Ronaldsway).

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Statutory (Section 42) consultation			
02/06/2023	Section 42 consultation	Statutory	IoM Airport registered an interest in the Morgan Generation Assets on the grounds of flight safety. IoM Airport requested to be included on the consultation list for the Morgan Generation Assets.
Aviation and radar consultation			
20/01/2023	Meeting	Non-statutory	The Applicant presented the approach to assessing effects and preliminary impact assessment results highlighting the need to engage further on potential mitigation options once the airport has reviewed the PEIR. It was noted that the airport is finalising a five year Instrument Flight Procedures (IFP) update, review of procedures and Instrument Landing System (ILS) is also approaching completion, and Distance Measuring Equipment (DME) infrastructure will be changing.
01/08/2023	Meeting	Non-statutory	Discussion of potential impact to stakeholder.
05/09/2023	Meeting	Non-statutory	Discussion of potential impact to stakeholder and appropriate mitigation for the Primary Surveillance Radar (PSR) at IoM Airport (Ronaldsway).
17/04/2024	Meeting	Non-statutory	Project update meeting and confirmation of IoM Airport (Ronaldsway) third party aviation surveillance strategy study.

Table 1.3: Summary of post-application consultation with IoM Airport (Ronaldsway).

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
03/09/2024	Meeting	Non-statutory	Initial discussion on SoCG content and positions.

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, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

1.4.1.2 Table 1.5 and Table 1.6 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.2.2) in relation to aviation and radar.

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1.4.2 Aviation and radar

Table 1.5: Agreement Log between the parties on assessment of effects to civil aviation and proposed mitigation.

Reference Number	Discussion point	Applicant's Position	IoM Airport (Ronaldsway) Position	Status
Assessment of effects to civil aviation and proposed mitigation				
IoMA.AR.1	Consultation	The Applicant has undertaken adequate consultation with IoM Airport (Ronaldsway) on potential impacts on aviation and radar.	Agreed in meeting 03/09/24.	Agreed
IoMA.AR.2	Consultation	Volume 2, Chapter 11: Aviation and radar (APP-015) has had due regard to matters raised by IoM Airport (Ronaldsway) through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed in meeting 03/09/24.	Agreed
IoMA.AR.3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within IoM Airport (Ronaldsway)'s remit.	Agreed in meeting 03/09/24 subject to review of IoM plans and policy context by IoM Airport (Ronaldsway).	Agreed (in principle)
IoMA.AR.4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar in Volume 2, Chapter 11: Aviation and radar (APP-015).	Agreed in meeting 03/09/24.	Agreed
IoMA.AR.5	Scoping	The scoping of impacts for the EIA for aviation and radar in Volume 2, Chapter 11: Aviation and radar (APP-015) is appropriate.	Ongoing point of discussion subject to IoM Airport (Ronaldsway) further review in relation to potential impact on radar during the construction phase.	Ongoing point of discussion
IoMA.AR.6	Study area	The aviation and radar study area (Figure 11.1 in Volume 2, Chapter 11: Aviation and radar (APP-015)) is appropriate for the receptors, sites and impacts assessed.	Agreed in meeting 03/09/24.	Agreed

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Reference Number	Discussion point	Applicant's Position	IoM Airport (Ronaldsway) Position	Status
IoMA.AR.7	Project design envelope	Volume 2, Chapter 11: Aviation and radar (APP-015) has identified, described and assessed the maximum design scenario for the EIA. The maximum design scenario is for the operation of 68 wind turbines with a maximum blade tip height of 364 m above LAT, as supported by the radar line of sight (LoS) methodology presented in paragraph 1.3.8.2 of Volume 4, Annex 11.1: Aviation and radar technical report (APP-045). The Applicant notes that the layout of wind turbines does not have a material effect on establishing theoretical radar line of sight so representative locations for 27 wind turbine locations on an even grid distribution were used for the analysis, as shown in Figure 1.6 of APP-045 for IoM Airport (Ronaldsway). The Applicant notes that this methodology is typical for offshore wind farm radar LoS analysis.	Ongoing point of discussion.	Ongoing point of discussion
IoMA.AR.8	Assessment methodology	The sensitivity criteria for aviation and radar receptors has been appropriately identified and sufficiently described within Volume 2, Chapter 11: Aviation and radar (APP-015).	Ongoing point of discussion.	Ongoing point of discussion.
IoMA.AR.9	Assessment methodology	<p>The list of projects screened into the Cumulative Effects Assessment (CEA) in Volume 2, Chapter 11: Aviation and radar (APP-015) are appropriate.</p> <p>In accordance with the Planning Inspectorate advice, the CEA long list of projects and plans was finalised three months before submission of the Morgan Generation Assets application (Volume 3, Annex 5.1: Cumulative effects screening matrix (APP-031)). The Cair Vie onshore wind farm project scoping report was published on 15 February 2024, after the finalisation of the CEA long list.</p> <p>The Applicant is aware that IoM Airport (Ronaldsway) are undertaking a surveillance strategy to manage air traffic safeguarding, which includes consideration of the Morgan Generation Assets and other relevant projects, and any potential mitigation requirements (see IoMA.AR.13).</p>	Agreed in meeting 03/09/24, subject to review of how the Cair Vie onshore wind farm on the IoM has been addressed.	Agreed (in principle)

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Reference Number	Discussion point	Applicant's Position	IoM Airport (Ronaldsway) Position	Status
IoMA.AR.10	Assessment of the effects from the Morgan Generation Assets alone	<p>The Morgan Generation Assets could have potential significant effects on the Primary Surveillance Radar (PSR) system at IoM Airport (Ronaldsway).</p> <p>With the implementation of further mitigation in the form of radar blanking and airspace change application for a Transponder Mandatory Zone (TMZ) and/or improvement of the airport MultiLATERation (MLAT) system (to be confirmed following the IoM Airport (Ronaldsway) surveillance strategy review as noted in IoMA.AR.13), the potential impact is assessed as minor adverse significance.</p>	Position to be provided at a future deadline.	Position to be provided at a future deadline.
IoMA.AR.11		<p>The Morgan Generation Assets could have potential significant effects on flight procedures at IoM Airport (Ronaldsway). The IFP assessment concluded that the Morgan Array Area will breach the Surveillance Minimum Altitude Area (SMAA) at Ronaldsway (IoM) Airport. With the implementation of further mitigation to raise the impacted altitudes, the potential impact is assessed as minor adverse significance.</p>	Agreed in meeting 03/09/24.	Agreed
IoMA.AR.12	Assessment of the effects from the Morgan Generation Assets cumulatively with other projects	<p>Once proposed mitigation measures are implemented, there will be no significant cumulative effects on aviation and radar in EIA terms for the Morgan Generation Assets cumulatively with other plans and projects.</p>	Ongoing point of discussion.	Ongoing point of discussion.

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Reference Number	Discussion point	Applicant's Position	IoM Airport (Ronaldsway) Position	Status
IoMA.AR.13	Mitigation	<p>The mitigation measures and conditions outlined in Volume 2, Chapter 11: Aviation and radar (APP-015) and the Mitigation and Monitoring schedule (APP-076) are appropriate and will result in minor adverse residual impacts, which are not significant in EIA terms.</p> <p>The Applicant is aware that IoM Airport (Ronaldsway) are undertaking a surveillance strategy to manage air traffic safeguarding which includes consideration of the Morgan Generation Assets and any potential mitigation requirements.</p> <p>The Applicant understands that the executive summary of this strategy is anticipated to be shared with the Applicant at the earliest opportunity.</p> <p>Following this, the Applicant will engage with IoM Airport (Ronaldsway) on the next steps and will update the Examining Authority at the next opportunity.</p>	<p>Ongoing point of discussion subject to IoM Airport (Ronaldsway) providing executive summary of their surveillance strategy review in relation to potential impact on radar. The Applicant and IoM Airport (Ronaldsway) will provide an update into the Examination when available.</p>	Ongoing point of discussion.

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Table 1.6: Agreement Log between the parties on VHF communications and navigation aids.

Reference Number	Discussion point	Applicant's Position	IoM Airport (Ronaldsway) Position	Status
VHF communications				
IoMA.VHF.1	VHF communications	<p>Potential impacts on VHF communications were not scoped into the assessment on the basis of distance from Isle of Man Airport (Ronaldsway) (15.4 nm) and pre-application stakeholder consultation.</p> <p>The Applicant notes that no representations were made by any party during the Scoping phase or Section 42 consultation on this matter.</p> <p>IoM policy and guidance for the developers and operators of renewable energy installations in the Isle of Man and its territorial airspace (https://www.gov.im/media/1381049/cp1-renewable-energy.pdf) does not mention consideration of VHF interference from wind energy developments.</p> <p>Following discussion with IoM Airport (Ronaldsway), the Applicant is looking into this matter further and the parties will update the ExA at a future deadline. The Applicant would welcome further information from Isle of Man Airport (Ronaldsway) to evidence their concerns.</p>	Isle of Man Airport (Ronaldsway) raised that the EIA did not consider VHF communications.	Ongoing point of discussion
Navigation aids				
IoMA.NAV.1	Navigation aids	<p>Following discussion with IoM Airport (Ronaldsway), the Applicant is looking into this matter further and the parties will update the ExA at a future deadline. The Applicant would welcome further information from Isle of Man Airport (Ronaldsway) to evidence their concerns.</p>	Isle of Man Airport (Ronaldsway) raised that the EIA did not consider navigation aids (MLAT).	Ongoing point of discussion