



Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with Defence Infrastructure Organisation

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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	9
1.3.1	Pre-application	9
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	17
4	References.....	18

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 DIO in relation to civil and military aviation and radar	14

Glossary of Acronyms

AfL	Agreement for Lease
ATC	Air Traffic Control
CEA	Cumulative Effects Assessment
CRNRA	Cumulative Regional Navigation Risk Assessment
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
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PSR	Primary Surveillance Radar
RAF	Royal Air Force
RLoS	Radar Line of Sight
SMEs	Subject Matter Experts
SoCG	Statement of Common Ground
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 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). 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 DIO is set out in section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23rd September and in section 3 of Annex B of the Rule 8 letter issued on the 30th 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 which fall under the statutory remit of DIO. 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 relate to offshore works. These are detailed in the Draft DCO (APP-012). A separate SoCG is being developed with the DIO and BAE Systems (Operations) Ltd in regard to Warton Aerodrome and thus not included in this SoCG.

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

Table 1.1 Topics included in the draft SoCG

Topic/Chapter	PINS Reference
Draft DCO	APP-012
Chapter 14 Shipping and Navigation	APP-051
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 co-ordination with the Mona Offshore Wind Project and Morgan Offshore Wind Project.

14. The MOD provided comments on the PEIR on 21st 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 submitted a Relevant Representation (RR-021) in August 2024.
16. The Applicant is committed to ongoing post-application engagement with DIO 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 DIO 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 DIO is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
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 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
Pre-application			
9 March 2022	Online meeting	Applicant	Online meeting to provide an overview of Scoping Report, key impacts and agree ways forward for Navigation Risk Assessment (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 Cumulative Regional Navigation Risk Assessment (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 Morgan Offshore Wind Project Generation Assets pre- PEIR.

Date	Contact type	Owner	Topic
27 July 2023	Phone Call	Applicant	Initial phone call to discuss MOD assessment of potential impacts including Warton and Woodvale Instrument Flight Procedures (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 Royal Air Force (RAF) Valley IFPs.
Post-application			
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 DIO in relation to civil and military aviation and radar

Topic/ref.	Discussion Point	Applicants position	DIO position summary	DIO's position
Environmental Impact Assessment (EIA) Aviation and Radar				
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	Assessment methodology	The aviation and radar receptors identified have been correctly assessed and sufficiently described within Volume 5, Chapter 16 Aviation and Radar (APP-053).	Agreed. Volume 5, Chapter 16 of the Environmental Statement has correctly identified the	Agreed

Topic/ref.	Discussion Point	Applicants position	DIO position summary	DIO's position
			relevant military radars and aerodromes that could be affected by this proposed development. Whilst we agree with this position, for the applicants awareness, section 16.167 states that RAF Valley's IFP's will be affected and require revision. The RAF have confirmed this is not the case, and no revision to RAF Valley's IFP's will be necessary.	
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. To address this harm, Requirement 3 to has been included at Schedule 2 within the draft DCO.	Agreed
DIO 11	Instrument Flight Procedure (IFP) Mitigation	As the proposed development does not affect the IFP's to RAF Woodvale and RAF Valley, reference to these have now been removed from the DCO requirement	The MOD notes the RAF Valley's inclusion in Requirement 7 is unnecessary.	Agreed

Topic/ref.	Discussion Point	Applicants position	DIO position summary	DIO's position
			RAF Valley's and RAF Woodvale's IFP's will not be affected by the proposed development and has not raised any concerns in relation to these military aerodromes. The MOD does not require the submission of an IFP Scheme, therefore, the reference to RAF Valley in Requirement 7 within Schedule 2 of the Draft DCO can be removed.	
DIO 12	Assessment of the effects from the Project alone and cumulative - radar	Potential effect on the Primary Surveillance Radar (PSR) at Warton Aerodrome are covered in a separate SoCG combined with the DIO and BAE Systems (Operations) Ltd. There are no other effects on radar identified relevant to the DIO.	Agreed.	Agreed
Environmental Impact Assessment (EIA) Shipping and Navigation				
DIO 13	Effects on shipping and navigation	There are no identified impacts to military maritime activities, it was confirmed by the DIO that there are no highly surveyed routes impacted by the Project.	Agreed. The MOD confirmed this in an email to the Applicant dated 23/12/22. The MOD also confirmed in their response dated 27 th January 2025 to ExA question ISN12, that the proposed development will not affect submarine nautical paths.	Agreed

3 Signatures

20. The above draft SoCG is agreed between DIO and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of DIO	
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 16 – Civil and Military Aviation and Radar (APP-053)

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

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

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