

Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with Blackpool Airport Ltd

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Glossary of Acronyms

AfL	Agreement for Lease
APDO	Approved Procedure Design Organisation
BA	Blackpool Airport Ltd
CAA	Civil Aviation Authority
CAP	Civil Aviation Publications
DCO	Development Consent Order
DOC	Designated Operational Coverage
DF	Direction Finding
DOC	Designated Operational Coverage
EIA	Environmental Impact Assessment
ES	Environmental Statement
IFP	Instrument Flight Procedure
IFR	Instrument Flight Rules
NDB	Non-Directional Beacon
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
UK	United Kingdom
VFR	Visual Flight Rules
VHF	Very High Frequency
WTG	Wind Turbine Generator

Glossary of Units

km ²	square kilometre
MW	Megawatt

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 Blackpool Airport 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 and Blackpool Airport Ltd 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. Situated on the Fylde Coast, Blackpool Airport Ltd offers aircraft handling, parking, engineering and refuelling services, flight and instrument training. This draft SoCG has been structured to reflect topics of the Application which are of interest to Blackpool Airport Ltd.

9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and Blackpool Airport 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 Blackpool Airport Ltd. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and Blackpool Airport Ltd.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to Blackpool Airport 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 Blackpool Instrument Flight Procedure Safeguarding Report	APP-079

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 Blackpool Airport Ltd 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.
14. Blackpool Airport Ltd provided comments on the PEIR on 2nd 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 Blackpool Airport Ltd is presented in **Table 2.1**.

1.3.2 Post-application

15. Blackpool Airport Ltd submitted a Relevant Representation (RR-013) in August 2024.

16. The Applicant is committed to ongoing post-application engagement with Blackpool Airport Ltd 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 Blackpool Airport 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
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 Blackpool Airport Ltd 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 Blackpool Airport Ltd 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 Blackpool Airport Ltd 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			
11 April 2022	Online meeting	Applicant	Online introductory meeting to the Project.
18 August 2022	Online meeting	Applicant	Online meeting to discuss project timeline, design, outline of assessment for PEIR and potential impacts of the WTGs on the airport.
20 July 2023	Online meeting	Applicant	Online meeting to introduce Blackpool Airport Ltd to our Aviation specialist for the Project, to discuss the airport's statutory consultation feedback and next steps for undertaking an Instrument Flight Procedure (IFP) assessment.
27 July 2023	Online meeting	Applicant	Follow-up online meeting to discuss potential impact to Blackpool Airport Ltd IFP procedures and how to move this forward.
9 November 2023	Online meeting	Applicant	Correspondence (phone call) with Blackpool Airport Ltd to discuss outcome of Cyrrus IFP assessment, identified mitigation measures for the Project and next steps.
24 November 2023	Online meeting	Applicant	Online meeting to discuss the outputs of the IFP assessment and potential mitigation measures.
5 December 2023	Online meeting	Applicant	Follow-up online meeting to discuss the outputs of the IFP assessment and potential mitigation measures.
19 December 2023	Online meeting	Applicant	Online meeting with Blackpool Airport Ltd, Morgan and Mona projects to discuss proposals to undertake a joint IFP assessment across all three projects collectively.
11 January 2024	Online meeting	Applicant	Online update meeting with Blackpool Airport Ltd to discuss timelines for progression of IFP assessments and IFP mitigation design process.

Date	Contact type	Owner	Topic
12 February 2024	Online meeting	Applicant	Follow-up online meeting to discuss timelines for progression of IFP assessments and IFP mitigation design process.
13 February 2024	Email	Applicant	Email meeting notes to Blackpool Airport Ltd following online meeting on 12th February 2024.
28 February 2024	Online meeting	Applicant	Online meeting with Blackpool Airport Ltd to discuss IFP mitigation process.
16 April 2024	Online meeting	Applicant	Online meeting to discuss Statement of Intent regarding mitigation of impact on airport IFPs.
19 April 2024	Email	Applicant	Draft Statement of Intent regarding mitigation of impact on airport IFPs forwarded by Blackpool Airport Ltd received by the Applicant.
1 May 2024	Email	Applicant	Comments on draft Statement of Intent forwarded to Blackpool Airport Ltd.
9 May 2024	Email	Applicant	Comments between the Applicant and Blackpool Airport Ltd on changes to draft Statement of Intent and process for amendment of affected IFPs.
21 May 2024	Email	Applicant	Comments on draft Statement of Intent forwarded to Blackpool Airport Ltd.
22 May 2024	Email	Applicant	Comments between the Applicant and Blackpool Airport Ltd on process for amendment of affected IFPs.
24 May 2024	Email	Applicant	Comments between the Applicant and Blackpool Airport Ltd on process for amendment of affected IFPs.
Post-application			
19 June 2024	Email	Applicant	Comments on draft Statement of Intent forwarded to Blackpool Airport Ltd.
11 July 2024	Email	Applicant	Comments on draft Statement of Intent forwarded to Blackpool Airport Ltd.
1 August 2024	Email	Applicant	Request update on signing off and finalisation of Statement of Intent

Date	Contact type	Owner	Topic
			from Blackpool Airport Ltd – no response received.
17 September 2024	Email	Applicant	Email to request meeting to discuss issues raised within Blackpool Airport Ltd Relevant Representation.
18 September 2024	Email	Applicant	Further representation made by Blackpool Airport regarding potential of offshore wind farms creating interference on Very High Frequency (VHF) and Direction Finding (DF) radio communications.
4 October 2024	Online meeting Applicant	Applicant	Online meeting to discuss issues raised within Blackpool Airport Ltd Relevant Representation and to progress a SoCG.
25 October 2024	Online meeting	Applicant	Online meeting to discuss and progress SoCG.
16 December 2024	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
13 January 2025	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
27 February 2025	Online 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 Blackpool Airport Ltd in relation to civil and military aviation and radar

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
Environmental Impact Assessment (EIA) Aviation and Radar				
BA 1	Consultation	The Applicant has undertaken adequate consultation with Blackpool Airport Ltd to date on potential impacts on aviation and radar. Further consultation is ongoing.	Consultation to date has been adequate. Further consultation is ongoing, pending the Civil Aviation Authority (CAA) 5-year review and updates to IFPs and Statement of Intent.	Agreed
BA 2		The EIA has had due regard to matters raised by Blackpool Airport Ltd through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed.	Agreed
BA 3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within Blackpool Airport Ltd's remit.	Agreed.	Agreed
BA 4	Baseline environment	<p>The Applicant has adequately characterised the baseline environment for aviation and radar with respect to Blackpool Airport Ltd.</p> <p>The description of uncontrolled airspace provided in the Airspace Analysis section of Appendix 16.1 was intended to give a general overview of the types of flying that takes place within it and was not meant as a detailed description of the airspace operations pertaining to Blackpool Airport. It is accepted that the services provided by Blackpool Airport in Class G airspace apply to both Visual Flight Rules (VFR) and</p>	<p>The Airspace Analysis is not accurate for Blackpool.</p> <p>2.3.1 states: <i>Aircraft in uncontrolled airspace are operating within a framework of rules but are not being controlled by ATC, although many pilots flying in this environment may choose to report their position, altitude, and intentions to ATC to benefit from the enhanced situational awareness that</i></p>	Not Agreed – no material impact

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
		Instrument Flight Rule (IFR) traffic and that this traffic includes corporate aviation and offshore helicopters. These details do not materially change the assessments of potential impacts on civil and military aviation or the significance of effects.	<p><i>brings. Users of this airspace tend to be small aircraft engaged in training or private (social) flying.</i></p> <p>This is a general description of Class G. However, Blackpool Approach provide an Air Traffic Control service and a Procedural Service to aircraft flying IFR in class G airspace – A Procedural Service is an ATS where, in addition to the provisions of a Basic Service, the controller provides restrictions, instructions, and approach clearances, which if complied with, shall achieve deconfliction minima against other aircraft participating in the Procedural Service – the aircraft is positively controlled, this service can only be provided by an air traffic controller.</p> <p>Whilst this does include aircraft engaged in training or private (social) flying, BA also have corporate aviation flying in and out of Blackpool, including large jets. BA also</p>	

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
			<p>have the offshore helicopters, who require a Procedural Service in order to retain the capability to operate IFR to ensure clearance from terrain, obstacles and other aircraft – without this service they could not operate from Blackpool. Please refer to Procedural Service (See CAP 774 – UK FIS).</p> <p>2.3.3 states: <i>‘Flight in class G airspace is generally visual, meaning pilots fly and navigate with reference to the natural horizon and terrain features they see outside. Pilots are required to maintain minimum distances from notified obstacles, including WTGs, and may only fly within the minimum weather and visibility criteria.’</i></p> <p>Aircraft in class G operate both VFR and IFR, Blackpool Approach routinely work IFR and VFR traffic, the ability to operate IFR means traffic can operate in very low visibility.</p>	

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
BA 5	Scoping	<p>Agreement to the scoping of impacts for the EIA for aviation and radar.</p> <p>It is noted that since the submission of the Application Blackpool Airport have identified potential impacts to VHF radio and Direction Finding (DF) (see BA-14).</p>	<p>Discussion noted in BA-14. Impacts on VHF radios and DF not captured. Blackpool whilst being a non-surveillance unit, is still an approach unit operating out to a Designated Operational Coverage (DOC) of 40 miles, regularly works traffic low level out to DOC, including offshore air traffic and coastguard.</p>	Agreed
BA 6	Study area	<p>The aviation and radar study area is appropriate for the receptors, sites and impacts assessed.</p> <p>It is noted that since the submission of the Application Blackpool Airport have identified potential impacts to VHF radio and DF (see BA-14).</p>	<p>Discussion noted in BA-14. Impacts on VHF radios and DF not captured. Blackpool whilst being a non-surveillance unit, is still an approach unit operating out to a DOC of 40 miles, regularly works traffic low level out to DOC, including offshore traffic and coastguard.</p>	Agreed
BA 7	Project design envelope	<p>Volume 5 Chapter 16 Civil and Military Aviation and Radar (APP-053) has identified, described and assessed the maximum design scenario for the EIA.</p>	Agreed.	Agreed
BA 8	Assessment methodology	<p>The aviation and radar receptors identified have been correctly assessed and sufficiently described within Volume 5, Chapter 16 Aviation and Radar (APP-053).</p> <p>It is noted that since the submission of the Application Blackpool Airport have identified</p>	<p>Discussion noted in BA-14. Impacts on VHF radios and DF not captured. Blackpool whilst being a non-surveillance unit, is still an approach unit operating out to a DOC of 40</p>	Agreed

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
		potential impacts to VHF radio and DF (see BA-14).	miles, regularly works traffic low level out to DOC, including offshore traffic and coastguard.	
BA 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
BA 10	Assessment of the effects from the Project alone	Predicted impacts from the Project alone on Blackpool Airport Ltd Instrument Flight Procedures (IFPs) have been correctly identified and assessed within Chapter 16 Civil and Military Aviation and Radar (APP-053).	Subject to second safeguarding assessment by Blackpool Airport's Approved Procedure Design Organisation (APDO) post completion of the CAA 5-year review as noted in BA-12.	Agreed
BA 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 Chapter 16 Civil and Military Aviation and Radar (APP-053). It is noted that since the submission of the Application Blackpool Airport have identified potential cumulative impacts to VHF radio and DF (see BA-14).	Discussion noted in BA-14. Impacts on VHF radios and DF not captured. Blackpool whilst being a non-surveillance unit, is still an approach unit operating out to a DOC of 40 miles, regularly works traffic low level out to DOC, including offshore traffic and coastguard.	Agreed
BA 12	Mitigation	The Applicant will work with Blackpool Airport Ltd to ensure that appropriate mitigation is in place prior to any wind turbine generator or offshore substation platform (excluding foundations) being erected as part of the authorised development. This will ensure	Further discussions are needed with the Applicant following completion of the CAA 5-year audit review.	Agreed

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
		<p>that the Project will not have a significant effect on Blackpool Airport Ltd.</p> <p>The Applicant has received details of agreed impacts and preferred mitigation solutions from Blackpool Airport Ltd and mitigation is now secured within the draft DCO.</p> <p>Once the examination has finished, the Applicant commits to ongoing discussions with Blackpool Airport on timelines for implementing the required mitigation.</p>	<p>Cyrrus plans to submit an updated IFP package to CAA in due course. However, the details and timelines of the validation process at the CAA are currently unknown and may surpass the examination process, therefore discussions between both parties would need to continue after the examination has concluded.</p> <p>The agreed requirement wording in the dDCO will also capture the need for a Required Navigation Performance (RNP) approach to runway 10 to mitigate impact on the existing Non-Directional Beacon (NDB) approach). As a result it has been agreed with the Applicant that the Statement of Intent previously discussed is no longer required.</p>	
BA 13	Mitigation	<p>IFP mitigation is predicated on revision of Blackpool Airport Ltd's IFPs following the CAA five-year audit review. The five-year review remains ongoing but is expected to conclude soon. Thereafter, the IFP assessment carried out to support the DCO Application may need to be reassessed.</p>	<p>Further discussions are needed with the Applicant following the completion of the CAA 5-year audit review.</p> <p>The Morecambe windfarm is currently being assessed as</p>	Agreed

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
		<p>If required, the Applicant has committed to commissioning a further safeguarding assessment on behalf of Blackpool Airport to confirm no additional impacts on the revised IFPs.</p> <p>Nonetheless, appropriate mitigation has already been identified and is now secured within the draft DCO.</p> <p>Once the examination has finished, the Applicant commits to ongoing discussions with Blackpool Airport on timelines for implementing the required mitigation.</p>	<p>part of the ongoing 5-year review. Cyrrus plans to submit an updated IFP package to CAA in due course. However, the details and timelines of the validation process at the CAA are currently unknown.</p> <p>Blackpool Airport welcomes the Applicant's agreement to conduct a further safeguarding assessment following publication of the CAA 5-year review, to confirm there are no additional impacts on the revised IFPs, should this be required.</p> <p>Blackpool Airport accepts discussions will remain ongoing post-examination on proposed timelines and implementation of the appropriate mitigation.</p>	
BA 14	Mitigation	The technical mitigation solutions proposed by the Applicant in respect of Blackpool Airport's IFPs have been developed and proven suitable at other aerodromes.	Agreed.	Agreed
BA 15	Mitigation	The required mitigation at Blackpool Airport (including IFP mitigation, VHF and DF mitigation, if required) is realistically	Agreed.	Agreed.

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
		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.		
BA 16	Very High Frequency (VHF) communications	<p>Effects on VHF communications are not addressed in the DCO Application documents, as it was considered that there would be nil / negligible detrimental effect to Blackpool Airport's operations.</p> <p>The Applicant has commissioned from qualified aviation consultancies to conduct the required VHF and DF communications assessments for Blackpool Airport. The report will be shared with Blackpool Airport once available.</p> <p>The Applicant has also agreed to contribute to the costs of the Airport undertaking its own assessment of the cumulative impacts of the Morecambe, Morgan and Mona offshore windfarm projects on the Airport's VHF / DF equipment.</p>	<p>Blackpool Airport welcomes the Applicant's decision to commission a VHF and DF impacts assessment, and its agreement to cover the costs of the Airport's own cumulative assessment to take into account other adjacent offshore wind farm projects. However discussions are ongoing regarding the funding coverage to be offered by the Applicant in respect of any mitigation determined necessary by the assessment.</p> <p>The Airport notes that it is unlikely that the findings of these assessments will be known prior to the close of examination. However, the broad requirement wording in the dDCO which has been agreed with the Applicant is intended to secure any</p>	In discussion

Topic/ref.	Discussion Point	Applicants position	Position summary	Blackpool Airport Ltd position
			necessary mitigation identified by ongoing assessment work.	
BA 17	Draft DCO	Wording in the draft DCO for Blackpool Airport Ltd is appropriate.	Wording of the requirement in the draft DCO has now been accepted	Agreed

3 Signatures

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

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of Blackpool Airport 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)

Morecambe Offshore Windfarm Ltd (2024) Appendix 16.2 Blackpool Instrument Flight Procedure Safeguarding Report (APP-079)