



Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Statement of Common Ground with NATS (En Route) plc

Document Reference: 9.5

Rev 05



Document History

Doc No	MOR001-FLO-CON-ENV-SCG-0005	Rev	05
Alt Doc No	PC1165-RHD-SG-XX-CO-Z-0006		
Document Status	Approved for Use	Doc Date	15 April 2025
PINS Doc Ref	9.5	APFP Ref	n/a

Rev	Date	Doc Status	Originator	Reviewer	Approver	Modifications
01	26 November 2024	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	n/a
02	22 January 2025	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated at Deadline 3
03	18 February 2025	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated at Deadline 4
04	11 March 2025	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated at Deadline 5
05	08 April 2025	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Final version with signatures

Contents

1	Introduction	7
1.1	Overview of the Project.....	7
1.2	Purpose of this document	7
1.3	Consultation.....	8
1.3.1	Pre-application	8
1.3.2	Post-application	8
1.3.3	Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters.....	9
2	Statements of Common Ground	9
3	Signatures	14
4	References	15

Tables

Table 1.1 Topics included in the SoCG	8
Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters	9
Table 2.1 Summary of consultation	9
Table 2.2 Topics agreed, in discussion, or not agreed with NATS in relation to civil and military aviation and radar.....	11

Glossary of Acronyms

AfL	Agreement for Lease
ATC	Air Traffic Control
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
UK	United Kingdom
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.



The future of renewable energy

A leading developer in Offshore Wind Projects

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 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 Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from NATS (En-Route) plc (referred to as NATS). 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 NATS is set out in section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23rd September 2024 and in section 3 of Annex B of the Rule 8 letter issued on the 30th October 2024. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 and Rule 8 letters.
8. This SoCG has been structured to reflect topics of the Application which are of interest to NATS, and which fall under the statutory remit of NATS. NATS

provide Air Traffic Control (ATC) services to aircraft flying in airspace over the UK and the eastern part of the North Atlantic.

9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and NATS to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
10. Throughout the SoCG the phrase 'Agreed' identifies any point of agreement between the Applicant and NATS. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and NATS.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to NATS.

Table 1.1 Topics included in the SoCG

Topic/Chapter	Applicant's Reference
Draft DCO	3.1
Chapter 16 Civil and Military Aviation and Radar	5.1.16
Appendix 16.1 Airspace Analysis and Radar Modelling	5.2.16.1

12. Further details of this topic and relevant consultation held to date can be found in the Consultation Report (REP1-002) and summarised below.

1.3 Consultation

1.3.1 Pre-application

13. The Applicant has engaged with NATS 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. NATS provided comments on the PEIR on 2nd May 2023 as part of the statutory consultation process. The Applicants response to these comments is presented in Volume 4 - Consultation Report Appendices Part 4 (I) (APP-019). Further detail on engagement undertaken with NATS is presented in **Table 2.1**.

1.3.2 Post-application

15. NATS provided a Relevant Representation (RR-060) in August 2024.
16. The Applicant is committed to ongoing post-application engagement with NATS 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 NATS 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 NATS 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 NATS 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 NATS 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			
2022	Letter	Applicant	Introductory letter to the Project sent to stakeholders.
10 th March 2023	Email	NATS	Technical and operational assessment undertaken by NATS.

Date	Contact type	Owner	Topic
31 st August 2023	Email	Applicant	Email to NATS requesting mitigation options for impact on Great Dun Fell, Lowther Hill and St Annes ATC radars be investigated.
25 th January 2024	Online meeting	Applicant	Confirmation from NATS that mitigation for the Project is available in the form of Multi-Radar Tracker blanking. Commencement of agreement negotiations between NATS and the Project.
From January 2024 and ongoing	Email	Applicant and NATS	Mitigation services contract coordination between both parties. Process remains ongoing
Post-application			
17 th and 23 rd September 2024	Email	Applicant	Email to request meeting to discuss the issues raised within their Relevant Representation.
10 th October 2024	Online meeting	Applicant	Online meeting to discuss issues raised within NATS's Relevant Representation and to progress a SoCG.
25 th October 2024	Online meeting	Applicant	Online meeting to discuss and progress SoCG.
9 th December 2024	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
7 th January 2025	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
12 th February 2025	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG.
3 rd March 2025	Online meeting	Applicant	Meeting to provide project update and discuss areas that remain 'In discussion' within the SoCG. All positions now agreed.

Table 2.2 Topics agreed, in discussion, or not agreed with NATS in relation to civil and military aviation and radar

Topic/ref.	Discussion Point	Applicants position	Position summary	NATS's position
Environmental Impact Assessment (EIA) Aviation and Radar				
NATS 1	Consultation	The Applicant has undertaken adequate consultation with NATS on potential impacts on aviation and radar.	Agreed.	Agreed
NATS 2		The EIA has had due regard to matters raised by NATS through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed.	Agreed
NATS 3	Policy	The Applicant has identified and considered the plans and policies relevant to aviation and radar, within NATS' remit.	Agreed.	Agreed
NATS 4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar.	Agreed.	Agreed
NATS 5	Scoping	Agreement to the scoping of impacts for the EIA for aviation and radar.	Agreed.	Agreed
NATS 6	Study area	The aviation and radar study area is appropriate for the receptors, sites and impacts assessed.	Agreed.	Agreed
NATS 7	Project design envelope	Volume 5, Chapter 16 Civil and Military Aviation and Radar (REP3-024) has identified, described and assessed the maximum design scenario for the EIA.	Agreed.	Agreed
NATS 8	Assessment methodology	The aviation and radar receptors identified have been correctly assessed and sufficiently described within Volume 5,	Agreed.	Agreed

Topic/ref.	Discussion Point	Applicants position	Position summary	NATS's position
		Chapter 16 Aviation and Radar (REP3-024).		
NATS 9		The list of projects screened into the Cumulative Effects Assessment (CEA) in Volume 5, Chapter 16 Civil and Military Aviation and Radar (REP3-024).	Agreed.	Agreed
NATS 10	Assessment of the effects from the Project alone	Predicted impacts from the Project alone on aviation and radar have been correctly identified and assessed within Volume 5, Chapter 16 Civil and Military Aviation and Radar (REP3-024).	Agreed.	Agreed
NATS 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 (REP3-024).	Agreed.	Agreed
NATS 12	Mitigation	Mitigation is required for ATC radars at Lowther Hill, St Anne's and Great Dun Fell. The Applicant has received details of preferred radar mitigation solutions from NATS.	Radar mitigation solution has been identified and NATS are in agreement with the solution. Both parties are engaging and progressing with the mitigation services contract to facilitate delivery.	Agreed
NATS 13	Mitigation	Both parties have identified appropriate mitigation and are progressing with the mitigation services contract to facilitate delivery.	Both parties have identified appropriate mitigation and are progressing with the mitigation services contract to facilitate delivery.	Agreed

Topic/ref.	Discussion Point	Applicants position	Position summary	NATS's position
NATS 14	Mitigation	The required mitigation 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.	Agreed
NATS 15	DCO wording	Appropriate wording is provided in the draft DCO.	NATS have reviewed the requirements within the draft DCO. NATS have agreed with the wording which will be reflected within the contract.	Agreed

3 Signatures

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

Signed:	[Redacted]
Print Name:	[Redacted]
Job Title:	Team Leader – NATS Safeguarding
Date:	01/04/2025
Duly authorised for and on behalf of NATS	
Signed:	[Redacted]
Print Name:	[Redacted]
Job Title:	Consent Manager (Morecambe Generation)
Date:	01/04/2025
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)