

## **Morecambe Offshore Windfarm: Generation Assets Examination Documents**

### **Volume 9**

### **Statement of Common Ground with Ørsted's Interested Parties**

Document Reference: 9.14

Rev 02



## Document History

<b>Doc No</b>	MOR001-FLO-CON-ENV-SCG-0014	<b>Rev</b>	02
<b>Alt Doc No</b>	N/A		
<b>Document Status</b>	Approved for Use	<b>Doc Date</b>	15 April 2025
<b>PINS Doc Ref</b>	9.14	<b>APFP Ref</b>	N/A

Rev	Date	Doc Status	Originator	Reviewer	Approver	Modifications
01	18 November 2024	Approved for use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	n/a
02	15 April 2025	Approved for use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updates to Applicant and Ørsted positions. Final version with signatures.

## Contents

1	Introduction .....	8
1.1	Overview of the Project.....	8
1.2	Purpose of this document .....	8
1.2.1	Consultation and engagement with Ørsted IPs .....	9
1.2.2	Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters .....	10
2	Statement of Common Ground .....	11
3	Signatures .....	24
4	References .....	25
	Table 1.1 Topics included in the SoCG .....	9
	Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters .....	11
	Table 2.1 Summary of consultation and engagement with Ørsted IPs.....	11
	Table 2.2 Topics agreed, in discussion or not agreed with Ørsted IPs .....	15

## Glossary of Acronyms

AfL	Agreement for Lease
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
ES	Environmental Statement
IP	Interested Party
MCA	Maritime Coastguard Agency
MNEF	Marine Navigation Engagement Forum
MOD	Ministry of Defence
MMO	Marine Management Organisation
NPS	National Policy Statement
NRA	Navigation Risk Assessment
OSP	Offshore substation platform
PEIR	Preliminary Environmental Information Report
PSR	Primary Surveillance Radar
SoCG	Statement of Common Ground
VTMP	Vessel Traffic Management Plan
WTG	Wind turbine generator

## Glossary of Units

km <sup>2</sup>	Square kilometre
MW	Megawatts

## 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 wind farm 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.
2. The wind farm 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 wind farm was received in 2023.
3. The AfL comprises an area of up to 125km<sup>2</sup> and reflects the wind farm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed wind farm site development area has been reduced to approximately 87km<sup>2</sup>.
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Wind farm (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 Wind farm and the Morgan Offshore Wind Project (another proposed wind farm 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 Wind farm Ltd (the Applicant) with input from Ørsted Interested Parties (IPs). 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 Wind farm Generation Assets (hereafter 'the Project').
7. Ørsted operate a number of offshore wind projects in the Irish Sea, and the term Ørsted IPs is used to include relevant Ørsted projects. Through discussions with Ørsted IPs it has been agreed that a combined SoCG will be submitted for the following IPs (this document).
  - Barrow Offshore Wind Limited
  - Burbo Extension Ltd
  - Walney Extension Limited

- Walney (UK) Offshore Wind farms Limited
  - Ørsted Burbo (UK) Limited
  - Morecambe Wind Limited (West of Duddon Sands Wind farm)
8. The need for a SoCG between the Applicant and existing wind farm operators is set out in section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23<sup>rd</sup> September 2024. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 letter.
  9. This SoCG has been structured to reflect topics of the Application which are of interest to Ørsted IPs.
  10. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and Ørsted IPs to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
  11. Throughout the SoCG the phrase 'Agreed' identifies any point of agreement between the Applicant and Ørsted IPs. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and Ørsted IPs.
  12. **Table 1.1** lists topics and documents of the Application which are of key interest to Ørsted IPs.

*Table 1.1 Topics included in the SoCG*

Topic/chapter	Applicant reference
Draft DCO	3.1
Chapter 16 - Civil and Military Aviation and Radar	5.1.16
Chapter 17 - Infrastructure and Other Users	5.1.17
Chapter 14 - Shipping and Navigation	5.1.14
Chapter 12 - Offshore ornithology	5.1.12

## 1.2.1 Consultation and engagement with Ørsted IPs

### 1.2.1.1 Pre-Application

13. The Applicant has engaged with the Ørsted IPs on the Project during the pre-application process, both in terms of informal non-statutory consultation (engagement) and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
14. Ørsted IPs provided comments on the PEIR on 2<sup>nd</sup> June 2023 as part of the statutory consultation process. The Applicant had regard to the comments and



this is presented in Volume 4 - Consultation Report Appendices Part 4 (I) (APP-019). Further detail on the engagement undertaken with Ørsted IPs is presented in **Table 2.1**.

15. The Applicant also engaged with shipping and navigation consultees, including a representative from Ørsted, in extensive regional consultation throughout the pre-application process via the hazard workshops as described in **Table 2.1**. The Applicant set up these forums in co-ordination with the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets. Further details about the hazard workshops can be found in the Consultation Report (APP-015) and ES Volume 5 – Chapter 14 – Shipping and Navigation (APP-051).
16. For further information on the consultation process please see the Consultation Report (APP-015).

#### 1.2.1.2 Post-Application

17. Following the submission of the DCO application on 31<sup>st</sup> May 2024, Ørsted IPs submitted Relevant Representations. These comprised of:
  - Barrow Offshore Wind Limited - RR-008
  - Burbo Extension Ltd – RR-014
  - Walney Extension Limited – RR-089
  - Morecambe Wind Limited – RR-056
  - Walney (UK) Offshore Wind farms Limited – RR-088
  - Ørsted Burbo (UK) Limited – RR-093
18. A Relevant Representation (RR-076) was also made by ScottishPower Renewables (West of Duddon Sands Wind farm) Ltd who jointly own the West of Duddon Sands Wind farm with Ørsted. ScottishPower Renewables and Ørsted have agreed that this SoCG should addresses comments made by the joint entity.
19. The Applicant is committed to continued engagement with Ørsted IPs as described to date in **Table 2.1**.

#### 1.2.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

20. 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.
21. 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
<b>Agreed</b> The matter is considered to be agreed between the parties.	Agreed
<b>Not Agreed – no material impact</b> The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or Ørsted IPs 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
<b>Not Agreed – material impact</b> The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or Ørsted IPs is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
<b>In Discussion</b> The matter is neither 'agreed' nor 'not agreed' and is a matter where further discussion is required between the parties	In Discussion

## 2 Statement of Common Ground

22. A summary of the consultation and engagement undertaken to date with Ørsted IPs is set out in **Table 2.1**, relevant to the assessment of effects to existing and proposed infrastructure during the pre and post application phases of the Project.
23. The matters agreed, in discussion, or not agreed (based on discussions and information exchanged between the Applicant and Ørsted IPs) are set out in **Table 2.2**.

*Table 2.1 Summary of consultation and engagement with Ørsted IPs*

Date	Contact type	Owner	Details
<b>Pre-application</b>			
19 April to 4 June 2023	Statutory consultation	Applicant	The Applicant undertook statutory consultation during this time. The Applicant notified Ørsted IPs by email four times on 14 and 19 April, 22 May and 2 June 2023 about the launch of the consultation, providing the opportunity for Ørsted IPs to make comments on the draft proposals.
28 and 29 September 2023	Engagement – ES Hazard Workshop	Applicant, Mona Offshore	In collaboration with Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets, the

Date	Contact type	Owner	Details
		Wind Project and Morgan Offshore Wind Project Generation Assets	<p>Applicant ran an in-person hazard workshop to inform stakeholders about the updated Navigation Risk Assessment (NRA)/ Cumulative Regional Navigation Risk Assessment (CRNRA) for the Environmental Statement (ES) following consultation. The workshops were attended by representatives from ferry operators, regulators, commercial bodies, oil and gas, ports, fishing communities and recreational users.</p> <p>The Hazard Workshop explained the proposed boundary changes to all projects in response to consultation feedback.</p>
25 October 2023	Engagement – Online meeting – response to statutory consultation	Applicant, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets	<p>The Applicant held an online meeting delivered collectively with the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets. The collective projects addressed the comments in Ørsted's operational offshore wind farm projects (Barrow, Burbo Bank, Burbo Bank Extension, and Walney 1, 2, 3 and 4) consultation feedback which was consistent across all three projects. Each project representative provided information on the proposed project changes including reduced spatial extent of each array area to minimise navigational safety risk in response to consultation.</p> <p>The potential wake effects to Ørsted's operational offshore wind farm projects were also discussed. Ørsted noted any sharing of sensitive information related to wake effects would need to be done under an NDA.</p> <p>It was agreed the individual projects would hold separate future meetings with Ørsted.</p>
08 November 2023	Engagement – Online meeting – response to statutory consultation	Applicant, Mona Offshore Wind Project and Morgan Offshore Wind	<p>The collective project representatives provided a project update and addressed the comments in Ørsted's and Scottish Power Renewables section 42 statutory consultation responses which was consistent across all three projects.</p> <p>Each project representative provided information on the proposed project</p>

Date	Contact type	Owner	Details
		Project Generation Assets	<p>changes including boundary changes to respond to navigation safety, reduced spatial extent of each array area to minimise navigational risk in response to consultation.</p> <p>The potential wake effects to the West of Duddon Sands Wind Farm Project were also discussed. Ørsted noted any sharing of sensitive information related to wake effects would need to be done so under an NDA, which was subsequently established between the Applicant and the respective Ørsted IPs.</p> <p>It was agreed the individual projects would hold separate future meetings with Ørsted.</p>
08 February 2024	MNEF Online Meeting 6 (invite only)	Applicant, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets	The Applicant invited the Ørsted IPs to the sixth MNEF online meeting to provide Project updates on shipping and navigation, revision to array areas and boundary changes. The Ørsted IPs were not invited to any preceding MNEF meetings.
<b>Post-application<sup>1</sup></b>			
1 <sup>st</sup> July 2024	Online meeting	Ørsted IPs	Meeting to discuss key areas of concern of the Ørsted IPs with the Applicant.
11 October 2024	Email	Applicant	Separate email's to each of the Ørsted IPs confirming engagement going forward would be collectively with the Ørsted IPs.
22 November 2024	Meeting	Applicant	Meeting to discuss key areas of concern of the Ørsted IPs with the Applicant.
25 November 2024	Call	Applicant	Meeting to discuss key areas of concern of the Ørsted IPs with the Applicant.

<sup>1</sup> Post-application engagement took place under a Non Disclosure Agreement (NDA) therefore no detail is provided for each record of engagement.

Date	Contact type	Owner	Details
10 January 2025	Online Meeting	Applicant	Meeting to discuss key areas of concern of the Ørsted IPs with the Applicant.
03 April 2025	Online Meeting	Applicant	Meeting to agree content of final SoCG.



Table 2.2 Topics agreed, in discussion or not agreed with Ørsted IPs

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
<b>Project Wide Considerations</b>				
OIP 1	Consultation	The Applicant has undertaken the requisite statutory consultation and appropriate engagement with the Ørsted IPs on identified impacts to date. A summary of engagement is set out in Table 2.1 above. The Applicant is committed to continuing engagement with Ørsted IPs.	There are aspects of the Applicant's application that we do not feel the Applicant has consulted on adequately in particular their obligations to engage with Ørsted in respect of wake loss under NPS-EN3.	Not Agreed – material impact
OIP 2	Baseline environment	<p>Sufficient data has been collated to appropriately characterise the baseline environment.</p> <p>The Applicant has undertaken a robust assessment of all potential impacts on offshore ornithology informed by appropriate data sources from site-specific surveys and detailed desktop studies, in accordance with relevant guidance. This is detailed in Chapter 12 Offshore Ornithology_Rev 03 Clean (Document Reference 5.1.12) and supported by the following examination submissions which have been incorporated into an updated RIAA at Deadline 4 and ES chapter at Deadline 5:</p> <ul style="list-style-type: none"> <li>Offshore Ornithology Technical Note 1 (EIA) Rev 02 (REP3-056)</li> </ul>	<p>The Ørsted IPs consider the cumulative and in-combination impact assessments require to be updated to include Barrow Offshore Wind farm. The Ørsted IPs do not agree with the Applicant's approach as the wind farm is not scheduled to be decommissioned by 2030, as the Applicant incorrectly states. It is not for the Applicant to disregard feedback provided by the asset owner and to determine when Barrow Offshore Wind Farm is scheduled for decommissioning. Likely extension of the wind farm beyond 2030 has been reiterated to the Applicant on numerous occasions over the course of the examination, as has the fact that extension of the wind farm does</p>	Not Agreed - material impact

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<ul style="list-style-type: none"> <li>Offshore Ornithology Technical Note 2 (HRA) (REP3-058)</li> <li>Offshore Ornithology Technical Note 3 (Red-Throated Diver at Liverpool Bay SPA Update Assessment) (REP1-082)</li> </ul> <p>The Applicant has correctly screened out Barrow OWF from the cumulative assessment as this project is scheduled to be decommissioned by 2030, and therefore there would be no overlap between the operation of the Project and Barrow. In its advice to the Applicant regarding the 'gap-filling' of historic projects, Natural England stated that <i>'It is of note that some OWFs screened into the assessments may be nearing end-of-life with limited (or no) overlap with the proposed project. It would be appropriate to consider timelines and determine if any of these sites can be screened out.'</i> The Applicant therefore considers it appropriate and logical to exclude Barrow from its cumulative and in-combination estimates.</p> <p>It is acknowledged that the extensions to existing operational projects could lead to overlap, and that Natural England and Natural Resources Wales have recommended that assessments should include projects nearing their end of life. However as stated by NRW in their</p>	<p>not require new operational consents to continue operations past 2030.</p> <p>Exclusion of an operational offshore wind farm on the grounds set out in the Applicant's position goes against precautionary principle and is irrational. It is a failure to accurately describe the environmental baseline, and its likely evolution as required by the of EIA Regulations. Furthermore, other applicants, namely Mona and Morgan, have taken the approach of including the production from Barrow Offshore Wind farm past 2030 into their cumulative environmental assessment.</p>	

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<p>Deadline 5 submission it is not considered that their inclusion materially affect the in combination assessment or conclusion and Natural England acknowledge the small impact of these projects.</p> <p>The Applicant considers that the assessment is precautionary as includes a wide number of projects that do not have a operational life over the full duration of the Project and there is no ability within assessments to account for such projects and their reduced effects. It is considered that the conclusions of the assessments would not be altered by the inclusion of Barrow and there remains uncertainty of the expected extension and licensing process required. Furthermore, the Applicant considers it is not for the Ørsted IPs to determine the approach to ornithological assessment. Instead, it is the responsibility and function of Natural England and NRW to provide advice to the ExA on this matter.</p>		
OIP 3	Policy and planning	<p>The Applicant has identified and considered all appropriate plans, policies and guidance.</p> <p>The Applicant notes that Policy NW-CO-1 of the North West Marine Plan states that: <i>Proposals that may have significant adverse impacts on, or displace, existing</i></p>	<p>The Ørsted IPs consider that the Applicant has correctly identified key regulatory instruments which apply to the Project, including the National Policy Statement EN-3, the Northwest Offshore Marine Plan, and the Infrastructure Planning (EIA) Regulations 2017, however, the Ørsted IPs do not agree with the</p>	Not Agreed – material impact



Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<p><i>activities must demonstrate that they will, in order of preference:</i></p> <ul style="list-style-type: none"> <li>a) <i>avoid</i></li> <li>b) <i>minimise</i></li> <li>c) <i>mitigate</i></li> <li>- <i>adverse impacts so they are no longer significant</i></li> </ul> <p>As set out in Chapter 17: Infrastructure and Other Users (REP1-038) the Applicant has assessed the effect of the Project on other windfarms or renewable developments to be minor adverse and not significant in EIA terms for all phases of the Project. Therefore, as set out in the Marine Plan Policy Review (APP-025) the Applicant reaffirms that the policy has been considered and the application is compliant.</p> <p>The Applicant has provided the GHG Technical Note to incorporate the wake effects identified in the Ørsted IPs Wake Impact Assessment report (without prejudice to the Applicant agreeing with these effects or the need for any assessment). The assessment in the GHG Technical Note does not change the results of the assessment. ES Chapter 21 Climate Change (Document Reference 5.1.21) has been updated to incorporate the assessment of indirect effects, including wake loss and diverted vessels, which shows there is still a positive net</p>	<p>Applicant's interpretation (see OIP 5) and application of such instruments in relation to issues raised.</p> <p>Chapter 17: Infrastructure and Other Users (REP1-038) does not include a quantification or a meaningful assessment of the wake effects that the Project will impose upon neighbouring offshore wind farms, including upon the Ørsted IP's assets. Instead, and as set out within written submissions made by the Ørsted IPs into the Applicant's examination, a wholly incorrect interpretation of the Frazer Nash 2023 study ('Offshore Wind Leasing Programme, Array Layout Yield Study', prepared for the Crown Estate) is relied upon to scope out further consideration of wake impacts.</p> <p>We reiterate that the GHG Technical Note did not assume a reasonable worst-case scenario that reflects an earlier-than-otherwise decommissioning date, noting that this would have significant implications for the findings of the GHG Technical Note</p>	

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		benefit on GHG emissions with the implementation of the Project.		
OIP 4		The Applicant has correctly identified the relevant National Policy Statements in relation to coexistence between offshore wind development and other infrastructure and users including existing operational offshore wind farms in their response to Ørsted IPs relevant representation.	The Ørsted IPs agree that the National Policy Statement EN-3 and the Northwest Offshore Marine Plan are the primary National Policy Statements relevant to this point. Specifically, the North West Offshore Marine Plan NW-CO-1 <sup>2</sup> (For the avoidance of doubt, the Ørsted IPs do not agree with the Applicant's interpretation/application (see OIP 5) of the NPS EN3 nor NW-CO-1 in several respects)).	Agreed
<b>Wake effects</b>				
OIP 5	Wake effects	There is a fundamental disagreement between the Applicant and Ørsted IPs in relation to the requirement for the assessment, mitigation and compensation of wake effects. This has been stated within written submissions throughout the examination. Therefore, these have not been repeated here to avoid omitting key parts of each party's position within this document. The matter will be addressed by both parties within their respective closing submissions.		Not Agreed – material impact

<sup>2</sup> NW-CO-1 states "Proposals that optimise the use of space and incorporate opportunities for co-existence and co-operation with existing activities will be supported. Co-existence NW-CO-1 Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant. If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding." Further, the policy aim is stated as "Space within the busy north west marine plan areas is limited. To realise sustainable social, environmental and economic benefits it is, therefore, important to plan for and make efficient use of the space. NW-CO-1 encourages proposals to be spatially planned, take account of existing activities, and promote co-existence. The policy ensures new proposals seek to avoid creating conflicts and to minimise their footprint, or optimise it where it may not be feasible to minimise."

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
<b>Radar</b>				
OIP 6	Warton Airfield Primary Surveillance Radar (PSR)	<p>The Applicant received a relevant representation from the (Ministry of Defence Infrastructure Organisation (DIO) dated 19 August 2024 (RR-021) in relation to the Air Traffic Control radar at BAE Warton. The Applicant has an SoCG with the DIO and BAE Systems (Operations) Ltd (Document Reference 9.10).</p> <p>The Applicant has engaged with the DIO who in turn engaged BAE Systems (Operations) Ltd regarding potential mitigation solutions for the Project, as appropriate to Warton PSR. The Applicant has now provided a proposed radar mitigation solution to the DIO and BAE Systems (Operations) Ltd (31 January 2025). Technical and operational assessments of the mitigation solution are now underway to deem if this is acceptable.</p> <p>At this time the nature of the Ørsted IPs' mitigation deployed at BAE Warton, and whether its application would extend to the Morecambe Offshore Wind farm, is unknown to the Applicant. The Applicant is also unaware as to whether such mitigation is contractually underpinned between DIO and BAE Systems</p>	<p>Burbo Extension Ltd and Walney Extension Limited are implementing appropriate mitigation in relation to potential impacts on the Warton Airfield Primary Surveillance Radar. Burbo Extension Ltd and Walney Extension Limited require assurance that the Morecambe Generation Assets will not adversely affect or increase the cost or degrade the performance of such mitigation and that, in the event that MOWL makes use of this mitigation, MOWL will contribute to the purchase, installation and maintenance costs.</p> <p>It is widely acknowledged that PSR CAPEX cost sharing is standard practice in addressing aviation concerns, in both the defence and civil aviation sector.</p>	In Discussion

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<p>(Operations), and Ørsted IPs by cost sharing principles or similar.</p> <p>The Applicant considers that any arrangements Burbo Extension Ltd and Walney Extension Limited have in place are primarily a matter between them and the DIO and BAE Systems (Operations).</p> <p>Similarly, any mitigation required as a result of the Project would also primarily be a matter between the Applicant and the DIO and BAE Systems (Operations).</p> <p>As noted above the Applicant has submitted a mitigation proposal to the DIO and BAE Systems (Operations), which is currently undergoing technical review.</p>		
<b>Shipping and Navigation including search and rescue</b>				
OIP 7	Vessel Traffic Management Plan (VTMP)	<p>The Applicant has secured the production of a VTMP in line with the Outline VTMP (REP3-047) in the draft DCO (Document Reference 3.1) (Schedule 6 Condition 9(1)(j)). Engagement with existing operators on the VTMP would be undertaken, as appropriate, with approval required from the Marine Management Organisation (MMO), Trinity House and the Maritime Coastguard Agency (MCA).</p> <p>The Applicant has committed within the updated Outline VTMP (REP3-047) submitted at Deadline 3 to maintaining the Marine Navigation Engagement Forum</p>	<p>On review of the Outline VTMP, the Ørsted IPs are not content that the wording highlighted commits the Applicant to adequate consultation prior to the approval of the document by the appropriate regulator and does not provide sufficient certainty. The Ørsted IPs request a formal commitment (that secures the verbal reassurance already provided by the Applicant) to ensure they have the opportunity to review the VTMP pre-submission to the Marine Management</p>	Not Agreed – no material impact

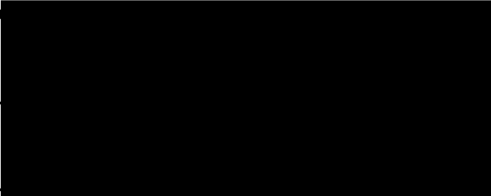
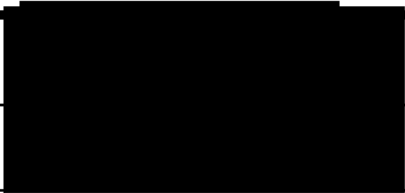


Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<p>(MNEF) post-consent and for a minimum of five years into the operational and maintenance phase of the Project. It is noted that similar commitments are made by the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets in their Outline VTMP. The Applicant anticipates that the frequency of MNEF meetings will be agreed with the group at the first meeting post-consent when the Applicant has a better understanding of the pre-construction programme and programme for preparation of key pre-commencement documents including the VTMP.</p> <p>Schedule 6 Condition 9(12) was reworded at Deadline 4 to clarify that the list of bodies that the MMO can consult with in relation to the approval of pre-construction plans and documentation is not exhaustive.</p>	<p>Organisation pre-construction in the interests of navigational safety within the vicinity of the Ørsted IPs assets, as a named consultee in the VTMP.</p>	
OIP 8	Emergency Response Cooperation Plan (ERCoP)	<p>The Applicant has secured the production of a ERCoP in the draft DCO (Document Reference 3.1) (Schedule 6 Condition 9(12)). Engagement with existing operators on the ERCoP would be undertaken, as appropriate, with approval required from the MMO and consultation with the MCA. The Applicant anticipates that the frequency of MNEF meetings will be agreed with the group at the first meeting post-consent when the Applicant has a better understanding of the pre-</p>	<p>The draft DCO does not specifically secure engagement. Instead, the Ørsted IPs expect close co-operation on the provision of an ERCoP. Emergency Response Co-operation Plan to ensure mutually beneficial outcomes.</p> <p>The Ørsted IPs are not satisfied that the commitment to engage with "existing sea users" or through the Marine Navigation Engagement Forum provide sufficient certainty</p>	Not Agreed – no material impact

Topic/ref	Discussion point	Applicant's position	Ørsted IPs	Position summary
		<p>construction programme and programme for preparation of key pre-commencement documents including the VTMP.</p> <p>Schedule 6 Condition 9(12) has been reworded at Deadline 4 to clarify that the list of bodies that the MMO can consult with in relation to the approval of pre-construction plans and documentation is not exhaustive.</p>	<p>that they will be adequately engaged with. The Ørsted IPs request a formal commitment to ensure they have the opportunity to review the VTMP pre-submission to the Marine Management Organisation pre-construction in the interests of navigational safety within the vicinity of the Ørsted IPs assets, as a named consultee in the VTMP.</p>	

### 3 Signatures

24. The above SoCG is agreed between Ørsted IPs and the Applicant on the day specified below.

Signed:		
Print Name:		
Job Title:	Commercial Manager	
Date:	15/04/2025	
Duly authorised for and on behalf of the Ørsted IPs		
Signed:		
Print Name:		
Job Title:	Consents Manager (Morecambe Generation)	
Date:	15 April 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)






# 9.14 Statement of Common Ground with Orsted's Interested Parties Rev 02

Final Audit Report

2025-04-15

Created:	2025-04-15
By:	Oliver Gardner (olivergardner@flotationenergy.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAdbDHAl9kj6Nzr_LGZMqrzqeB0LY2wzMd

## "9.14 Statement of Common Ground with Orsted's Interested Parties Rev 02" History

-  Document created by Oliver Gardner (olivergardner@flotationenergy.com)  
2025-04-15 - 3:45:25 PM GMT
-  Document emailed to Pierre-Jean Noziere (pinoz@orsted.com) for signature  
2025-04-15 - 3:45:30 PM GMT
-  Email viewed by Pierre-Jean Noziere (pinoz@orsted.com)  
2025-04-15 - 3:53:24 PM GMT
-  Document e-signed by Pierre-Jean Noziere (pinoz@orsted.com)  
Signature Date: 2025-04-15 - 3:59:39 PM GMT - Time Source: server
-  Agreement completed.  
2025-04-15 - 3:59:39 PM GMT