

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and Blackpool Airport

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Image of an offshore wind farm

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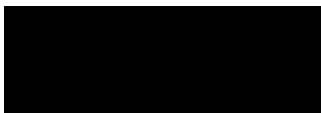

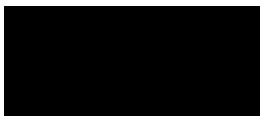

Prepared by:

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Morgan Offshore Wind Ltd.

Signatories

Signed	
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Date	27 February 2025
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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets, and associated activities.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
APDO	Approved Procedure Design Organisation
CAA	Civil Aviation Authority
DCO	Development Consent Order
DF	Direction Finding
DOC	Designated Operational Coverage
EIA	Environmental Impact Assessment
ExA	Examining Authority
IAP	Instrument Approach Procedures
ISAA	Information to Support Appropriate Assessment
MATS	Manual of Air Traffic Services
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MSA	Minimum Sector Altitude
OSP	Offshore Substation Platform
SoCG	Statement of Common Ground
VHF	Very High Frequency

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Units

Unit	Description
nm	Nautical miles

1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND BLACKPOOL AIRPORT

1.1 Introduction

1.1.1 Overview

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

1.1.1.2 The need for a SoCG between the Applicant and Blackpool Airport is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 5 August 2024 (PD-001).

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG facilitate further discussion between the parties and will be updated during the Morgan Generation Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-001).

1.1.2 Morgan Generation Assets elements under Blackpool Airport's remit

1.1.2.1 Blackpool Airport is a regional airport serving the Fylde Coast and the surrounding areas, providing a range of aviation services including commercial flights, private charters, and flight training. The airport's remit includes ensuring the safety and efficiency of air traffic operations within its airspace, as well as maintaining compliance with relevant aviation regulations and safeguarding its operational interests against potential impacts from nearby developments.

1.1.2.2 The elements of the Morgan Generation Assets which may affect the interests of Blackpool Airport are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (Document Reference C1).

1.1.2.3 This SoCG covers the following topics of relevance to Blackpool Airport:

- Assessment of effects to civil aviation and proposed mitigation
- VHF / DF communications.

1.1.3 Overview of Morgan Generation Assets

1.1.3.1 The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The Morgan Generation Assets will include offshore infrastructure and consists of:

- Morgan Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables, interconnector cables and offshore export cables will be located.

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the pre-examination phase and will be progressed during the examination phase of the Morgan Generation Assets. In

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accordance with discussions between the parties, the SoCG is focused on those issues raised by Blackpool Airport within its response to Scoping, Section 42 consultation and as raised through the pre-application consultation process. This SoCG also includes those issues raised by Blackpool Airport during the post-application phase (i.e. relevant representations and pre-examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement Log.

1.2 Summary of SoCG

1.2.1 Overview

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Morgan Generation Assets. The agreement logs present the position reached on 3 October 2024 (Deadline 1).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, ongoing points of discussion or not agreed between the parties.

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

Topic	Agreement status
Assessment of effects to civil aviation and proposed mitigation	Some points agreed, some ongoing points under discussion.
VHF / DF communications	Ongoing point of discussion

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1.3 Summary of Consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with Blackpool Airport, relevant to aviation and radar during the pre-application phase of the Morgan Generation Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with Blackpool Airport, relevant to aviation and radar during the post-application phase of the Morgan Generation Assets.

Table 1.2: Summary of pre-application consultation with Blackpool Airport.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Aviation and radar			
25/08/2023	Meeting	Non-statutory	Discussion of potential impact to stakeholder and future engagement for route to mitigation.
19/12/2023	Meeting	Non-statutory	Discussion of potential impact to stakeholder.

Table 1.3: Summary of post-application consultation with Blackpool Airport.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
25/07/2024	Relevant representations	Statutory	Relevant representations of Blackpool Airport.
23/08/2024	Meeting	Non-statutory	Meeting to discuss initial SoCG.
04/09/2024	Email to Applicant from Blackpool Airport	Non-statutory	Updated information on radio communications.
08/01/2025	Meeting	Non-statutory	Review of final SoCG and discussion regarding draft requirement wording.
10/01/2025	Meeting	Non-statutory	Review of final SoCG and discussion regarding draft requirement wording.
January and February 2025	Email Correspondence	Non-statutory	Various further engagement relating to SOCG and DCO requirement

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1.4 Agreement log

1.4.1 Overview

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

1.4.2 Aviation and VHF / DF communications

1.4.2.1 Table 1.5 and Table 1.6 set out the level of agreement between the parties for each relevant component of the application in relation to aviation and VHF / DF communications.

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

Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
Environmental Impact Assessment (EIA)				
BA.AR.1	Consultation	The Applicant has undertaken adequate consultation with Blackpool Airport on potential impacts on aviation and radar.	Consultation to date has been adequate. Further consultation is ongoing and pending the five-year review.	Agreed
BA.AR.2	Consultation	The EIA has had due regard to matters raised by Blackpool Airport through statutory and non-statutory consultation on potential impacts on aviation and radar.	Agreed subject to sight of previous minutes.	Agreed
BA.AR.3	Policy	The Applicant has identified and considered all plans and policies relevant to aviation and radar, within Blackpool Airport's remit.	Agreed.	Agreed.
BA.AR.4	Baseline environment	The Applicant has adequately characterised the baseline environment for aviation and radar. Blackpool Airport is included in the consultation table (Table 11.4 of Volume 2, Chapter 11: Aviation and radar (APP-015)) where it is noted that 'The potential impact on Blackpool Airport is considered within Appendix B of Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement. Analysis conclusions indicate that there will be no impact to currently published Blackpool Airport IFP/MSA'. Due to no predicted impact, Blackpool Airport was not discussed further in the chapter, however the Applicant has acknowledged in BA.AR.12 below that Blackpool is conducting a review of its flight procedures and cannot comment on the conclusion of the assessment until that process is complete. Further, following provision of information from Blackpool Airport post-application, VHF communications is addressed in Table 1.6.	Blackpool not mentioned in the baseline environment, although it does mention offshore helicopters. As in BA.AR.6 below provision of service to DOC should be taken into account, particularly as a non-surveillance unit that provide service to the offshore helicopters.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
BA.AR.5	Scoping	The scoping of impacts for the EIA for aviation and radar is appropriate, given the prevailing understanding of aviation issues at the point of submission. The applicant acknowledges the emergence of VHF / DF as a matter for consideration post submission.	Blackpool Airport notes the addition of assessment of impacts on VHF / DF comms post submission, and the ongoing nature of this work. Note: although the parties are generally aligned in position, this matter is not closed out pending conclusion of the VHF / DF assessment. This item is also to an extent superseded by BA.AR.12, which is also an ongoing point of discussion.	Ongoing point of discussion
BA.AR.6	Study area	The aviation and radar study area is appropriate for the receptors, sites and impacts assessed.	States 17 km for non-radar units, should be greater, Blackpool is an Approach control unit with DOC 40 nm.	Ongoing point of discussion
BA.AR.7	Project design envelope	Volume 2, Chapter 11: Aviation and radar (APP-015) has identified, described and assessed the maximum design scenario for the EIA.	Agreed.	Agreed.
BA.AR.8	Assessment methodology	The sensitivity criteria for aviation and radar receptors has been correctly identified and sufficiently described within Volume 2, Chapter 11: Aviation and radar (APP-015), in line with the agreed scope at point of submission. The Applicant acknowledges the emergence of VHF / DF as a matter for consideration post submission, and is in agreement and has financially supported the delivery of an assessment of VHF impacts by the aerodrome's APDO.	BA notes that VHF / DF has arisen as a matter post consent and is now subject to assessment by the aerodrome's APDO. Both parties shall engage further on this matter on receipt. Note: although the parties are generally aligned in position, this matter is not closed out pending conclusion of the VHF / DF assessment. This item is also to an extent superseded by BA.AR.12, which is also an ongoing point of discussion.	Ongoing point of discussion
BA.AR.9	Assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in Volume 2, Chapter 11: Aviation and radar (APP-015) are appropriate.	Agreed.	Agreed.

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Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
BA.AR.10	Assessment of the effects from the project alone	<p>There will be no significant effects on aviation assets operated by Blackpool Airport in EIA terms for the Morgan Generation Assets alone.</p> <p>Final position (08 Jan 2025): The safeguarding assessment process is not yet complete. However, the Applicant and Blackpool Airport have been engaging on the mitigation required to ensure there will be no significant effects, and therefore, this agreement statement is superseded by BA.AR.12.</p>	<p>Safeguarding assessment ongoing. Should this complete in the determination phase, an update will be submitted to the Secretary of State.</p> <p>Note: although the parties are generally aligned in position, this matter is not closed out pending conclusion of the relevant assessments. This item is also to an extent superseded by BA.AR.12, which is also an ongoing point of discussion.</p>	Ongoing point of discussion
BA.AR.11	Assessment of the effects from the project cumulatively with other projects	<p>There will be no significant effects on aviation assets operated by Blackpool Airport (as currently approved by the CAA) in EIA terms for the Morgan Generation Assets cumulatively with other plans and projects.</p> <p>The project acknowledges the evolving consideration of VHF / DF matters, and will continue to engage in response to the assessment of these matters by the aerodrome's APDO.</p>	<p>Safeguarding and cumulative assessment ongoing. Should this complete in the determination phase, an update will be submitted to the Secretary of State.</p> <p>Note: although the parties are generally aligned in position, this matter is not closed out pending conclusion of the relevant assessments. This item is also to an extent superseded by BA.AR.12, which is also an ongoing point of discussion.</p>	Ongoing point of discussion

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BA.AR.12	Mitigation	<p>No significant effects on aviation assets operated by Blackpool Airport were predicted in the EIA (APP-015), however the Applicant understands that Blackpool Airport is currently conducting a 5 year review of its flight procedures and cannot comment on the conclusion of the Applicant's assessment or any need for mitigation measures until that process is complete.</p> <p>The Applicant will work with Blackpool Airport to ensure that appropriate mitigation is in place so that the Morgan Generation Assets will not have a significant effect on the Blackpool Airport Minimum Sector Altitude (MSA) (which is assumed to be delivered through raising the MSA from 2000 to 2200ft).</p> <p>The parties are engaging on a commercial side agreement, the purpose of which is to offset costs incurred by Blackpool Airport for implementation of the mitigation.</p> <p>The parties have been revising the drafting of a new DCO requirement designed to secure appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the Operator to provide safe airport operational and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding communication systems) for Blackpool Airport. The new requirement, which is set out in Appendix 1, will be included in the draft DCO submitted at Deadline 6.</p> <p>Whilst the parties are broadly agreed on the requirement, disagreement remains between the parties as to whether the Offshore Substation Platform should be included in the definition of the works that cannot commence without mitigation implemented. The applicant shall continue to engage with the IP on this late arising matter with</p>	<p>Blackpool Airport is undertaking a safeguarding assessment which is updating its five-year review as requested by the CAA and considering both the Morgan Generation Assets and other relevant projects.</p> <p>This is anticipated to be submitted to the CAA in October/November 2024. At the time of writing, it is difficult to estimate when approval and implementation of the finalised instrument approach procedures (IAPs) will be received.</p> <p>The ExA will be updated by the applicant as engagement continues with the CAA.</p> <p>Safeguarding assessment ongoing. Should this complete in the determination phase, an update will be submitted to the Secretary of State.</p> <p>The Airport's position is that mitigation is required to be in place ahead of any above-sea development, with this position to be maintained until mutually accepted evidence is provided that the OSP would create no impact on air traffic services requiring mitigation. The Airport's requested amendment to the requirement wording to address this point is shown square-bracketed in bold, red text at Appendix 1. This wording has been accepted by the Applicant of the Morecambe Offshore Generation Assets DCO.</p>	Ongoing point of discussion
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Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
		the aim of providing technical comfort that the OSP is not a material concern to the provision of air traffic services at the aerodrome.		

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Table 1.6: Agreement Log between the parties on VHF / DF communications.

Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
BA.VHF.1	VHF / DF communications	<p>VHF / DF communications are not addressed in the application documents, as it was considered that there would be nil/negligible detrimental effect to Blackpool Airport radio communications at the Morgan Generation Assets range (291°/28.8 nm measured from the Airfield Reference Point (ARP) to the closest boundary of the Morgan Array Area). It was considered that Blackpool Airport are unlikely to be providing a service in that location, as aircraft would likely be operating autonomously or be in communication to the radar equipped aerodromes (Warton, RAF Valley, Isle of Man (Ronaldsway), Liverpool) or NATS.</p> <p>Following correspondence with Blackpool Airport, the Applicant has agreed to support the aerodrome in commissioning their APDO to undertake a VHF / DF assessment and will continue to engage with them on this matter on receipt.</p> <p>The parties are engaging on a commercial side agreement (as set out in BA.AR.12 above), the purpose of which is to offset costs incurred by Blackpool Airport for implementation of the mitigation.</p> <p>The parties have broadly agreed the drafting of a new DCO requirement designed to secure appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the Operator to provide safe airport operation and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding</p>	<p>Blackpool is a Procedural Approach Control Unit, operating on frequency 119.955 which has a DOC of 40 miles.</p> <p>NHV Helicopters operate to and from the offshore rigs in the Liverpool and Morecambe Bay, visually at low-level, remaining on the Blackpool Airport frequency until descending to the rig. The Millom platform is located 33 nm from Blackpool Airport.</p> <p>Aircraft regularly call Blackpool Approach outside of their 25 nm Minimum Sector Altitude (MSA). The Blackpool Manual of Air Traffic Services (MATS) Part 2 document details procedures to cater for traffic outside of the 25 nm MSA.</p> <p>Concerns raised by Blackpool Airport:</p> <ul style="list-style-type: none"> • Potential interference to communications with aircraft operating low level to the west of Blackpool, therefore impacting service provision (particularly alerting service) and leading to safety implications for aircraft in the vicinity of the development including Offshore (NHV) helicopters, Coastguard and others. • Impact on communications and therefore provision of a service to aircraft operating from the south to Walney Aerodrome when Warton are closed. • Blackpool Approach has an agreement with 78 Squadron (Distress & Diversion) to monitor the emergency frequency 121.5 (DOC 40 nm) down to 1,000 ft. Concerns raised regarding the safeguarding of this frequency, the continuance of the monitoring of 121.5 (Distress & Diversion) and safeguarding forward relay and provision of an alerting service. 	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	Blackpool Airport's Position	Status
		<p>communication systems) for Blackpool Airport. The new requirement, which is set out in Appendix 1, will be included in the draft DCO submitted at Deadline 6 as requirement 9.</p> <p>As noted at BA.AR.12, the applicant resists the inclusion of the OSP within the terms of the requirement, noting it cannot be the source of material impact to operations either in regard to air traffic management or communications.</p>	<p>As noted at BA.AR.12 above, the Airport's requested amendment to the requirement wording to address this point is shown square-bracketed in bold, red text at Appendix 1. This wording has been accepted by the Applicant of the Morecambe Offshore Generation Assets DCO.</p> <p>The Airport is unable to accept the requirement as drafted by the applicant until mutually accepted evidence is provided that the OSP would create no impact on air traffic services requiring mitigation. This therefore remains an ongoing point of discussion.</p>	

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Appendix 1: Proposed requirement wording

Operation of Blackpool Airport

- [x].—(1) No part of any wind turbine generator **[or offshore substation platform]*** (excluding foundations) shall be erected as part of the authorised development until the Secretary of State, having consulted with the Operator and the CAA, has confirmed in writing that s/he is satisfied that:
- (i) Appropriate Mitigation will be implemented and maintained throughout the lifetime of the authorised development; and
 - (ii) appropriate arrangements have been put in place with the Operator to ensure that such Appropriate Mitigation is so implemented and maintained.
- (2) For the purposes of this requirement—
- “Appropriate Mitigation”** means appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the Operator to provide safe airport operational and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding communication systems) for Blackpool Airport;
- “Approved Mitigation”** means the Appropriate Mitigation agreed with the CAA and the Operator and approved by the Secretary of State in accordance with sub-paragraph (1);
- “CAA”** means the Civil Aviation Authority constituted by the Civil Aviation Act 1982; and
- “Operator”** means Blackpool Airport Operations Limited (incorporated in England and Wales with company number 09307995 and whose registered office is Number One Bickerstaffe Square, Talbot Road, Blackpool FY1 3AH), or such other organisation as is licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services for Blackpool Airport.
- (3) The undertaker shall thereafter comply with all obligations contained within the Approved Mitigation throughout the lifetime of the authorised development.

***Additional wording requested by Blackpool Airport but not agreed by the Applicant**