

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**BAE Systems (Warton Aerodrome) SoCG**



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## Acronyms

Acronym	Meaning
CoCP	Code of Construction Practice
DCO	Development Consent Order
EnBW	Energie Baden-Württemberg AG
ExA	Examining Authority
RR	Relevant Representation
SoCG	Statement of Common Ground

# 1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and BAE Systems (Warton Aerodrome)

## 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 (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL) (hereafter referred to together as ‘the Applicants’) and BAE Systems (Operations) Limited (hereafter referred to as ‘BAE Systems’), together 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 and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as ‘the Transmission Assets’).

1.1.1.2 The need for a SoCG between the Applicants and BAE Systems is set out in section 1 of Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025.

1.1.1.3 This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Transmission Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter.

### 1.1.2 Transmission Assets elements under BAE System’s remit

1.1.2.1 BAE Systems’ concerns, as set out in their Relevant Representation (RR-208), are focused on the potential for impacts to arise from the Transmission Assets on operations at Warton Aerodrome. The elements of the Transmission Assets which may affect the interests of BAE Systems are within Work Numbers 35A/B and 44A/B covering the environmental mitigation areas and biodiversity benefit sites, and Work Number 17A/B in relation to the crossing of Browns Lane Solar Farm electrical cables. Further details are contained in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).

1.1.2.2 This SoCG covers the impacts arising from the Transmissions Assets on Aviation and Radar – specifically, in respect of the following topic areas:

- Environmental Impact Assessment (EIA) Matters and the Applicants’ Environmental Statement
- Bird Strike

- Aerodrome Safeguarding
- Solar Farm Protections

### 1.1.3 Overview of Transmission Assets

- 1.1.3.1 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to together as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own separate set of transmission assets (e.g., cable and substation infrastructure). However, the infrastructure will be co-located (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to the environment and the community.
- 1.1.3.2 Morgan OWL and Morecambe OWL (the Applicants), are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.
- 1.1.3.3 The key components of the Transmission Assets include the following:
- Offshore elements:
    - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.
  - Landfall:
    - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
  - Onshore elements:
    - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
    - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
    - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
    - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and

- biodiversity benefit sites: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

## 1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed and will be progressed during the examination phase of the Transmission Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by BAE Systems within its response to Scoping, Section 42 consultation and as raised through the non-statutory meetings held with BAE Systems prior to submission of the application for the Transmission Assets (Application). This SoCG also includes those issues raised by BAE Systems 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 phases of the Transmission Assets. The agreement log presents the position reached by Deadline 3 (7 July 2025).

### 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 which are agreed, any ongoing points of discussion and those matters which are not agreed between the parties.

**Table 1.1: Summary of those matters agreed, ongoing points of discussion and not agreed**

Topic	Agreement status
–EIA Matters and the Applicants' Environmental Statement	Some matters Not Agreed; some matters Ongoing point of discussion
Bird Strike	Some matters Not Agreed; some matters Ongoing point of discussion
Aerodrome Safeguarding	Ongoing point of discussion
Solar Farm Protections	Ongoing point of discussion



## 1.3 Summary of Consultation

- 1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicants with BAE Systems during the pre-application phase of the Transmission Assets.
- 1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicants with BAE Systems during the post-application phase of the Transmission Assets. The summary presented is not exhaustive account but provides an overview of the primary discussions undertaken between the parties. All attendees at the meetings listed in Table 1.2 are provided in the Technical Engagement Plan (APP-189) and Consultation Report (APP-170). However, for the avoidance of doubt, this SoCG is limited to those matters which are between BAE Systems and the Applicants.
- 1.3.1.3 This initial SoCG makes reference to other documents submitted with the Application that set out, in greater detail, the discussions that have taken place between BAE Systems and the Applicants. These documents are:
- The Technical Engagement Plan (APP-041) and appendices (APP-190, APP-191 and APP-192);
  - The Consultation Report (APP-170) and annexes (APP-187 and APP-188);
  - BAE Systems' Relevant Representation (RR-208); and
  - The Applicants' response to BAE Systems' Relevant Representation at the Procedural Deadline.

**Table 1.2: Summary of pre-application consultation with BAE Systems**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Scoping</b>			
08 December 2022	Scoping Opinion	Statutory	Issue of Scoping Opinion
<b>Statutory (Section 42) consultation</b>			
23 November 2023	Section 42 response	Statutory	Section 42 response of BAE Systems

**Table 1.3: Summary of post-application consultation with BAE Systems**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
April 2025	Relevant Representations	Statutory	Relevant representations of BAE Systems
12 May 2025	Meeting	Non-statutory	Introduction to the SoCG process



Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19 May 2025	Meeting	Non-statutory	Strategy for wildlife hazard management plan
02 July 2025	Meeting	Non-statutory	Update of SoCG

## 1.4 Agreement log

- 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.

- 1.4.1.2 Table 1.5 sets out the level of agreement between the parties for each relevant component of the Application (as identified in paragraph 1.1.2.2).

## 1.4.2 Aviation and Radar

**Table 1.5: Agreement log between the parties on Aviation and Radar**

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
<b>EIA Matters and the Applicants' Environmental Statement</b>				
BAE.AR.1	Consultation	The Applicants have undertaken adequate consultation with BAE Systems on the potential for impacts on aviation and radar at Warton Aerodrome.	[BAE Systems' position TBC – consultation between the Applicants and BAE Systems is ongoing.	Ongoing point of discussion
BAE.AR.2	Consultation	The EIA has had due regard to matters raised by BAE Systems through statutory and non-statutory consultation on potential impacts on aviation and radar at Warton Aerodrome.	<p>The impact of the Transmission Assets on operations at Warton Aerodrome was scoped out of the Applicants' Environmental Statement (ES) due to the central part of the runway at the Aerodrome being located more than 2.5km from the works boundary for the project. BAE Systems disagrees with the Applicants' approach.</p> <p>The EIA should have considered the impact of the Transmission Assets on operations at Warton Aerodrome, including the potential for bird strike resulting from the environmental mitigation areas and the biodiversity benefit sites being located within Warton Aerodrome's 13km wildlife hazard safeguarding zone.</p> <p>Furthermore, the EIA should have considered the impact of the</p>	Not agreed

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
			Transmission Assets on the Aerodrome's communications, navigation and surveillance equipment (with the relevant 'study area' / 'zone of influence' being the area within a 6km radius of the Aerodrome – as per CAP378 and CAP772).	
BAE.AR.3	Policy	The Applicants have identified and considered policies relevant to aviation and radar within the Fylde Local Plan	No assessment of the Transmission Assets against Local Plan Policy T2 (with reference to the impact on operations at Warton Aerodrome) has been undertaken by the Applicants. Reference is made to this policy in the Planning Statement and the Local Planning Policy Tracker. However, no assessment or analysis of policy compliance has been undertaken.	Not agreed
BAE.AR.4	Baseline environment	The Applicants have adequately characterised the baseline environment for aviation and radar. The baseline is appropriate for the purpose of the EIA and HRA.	See BAE Systems' position in respect of BAE.AR.2 – the baseline environment for aviation and radar, as described in the ES, should have included Warton Aerodrome.	Not agreed
BAE.AR.5	Scoping	The scoping of impacts is appropriate to inform the assessment of aviation and radar within the EIA.	See BAE Systems' position in respect of BAE.AR.2 – the impact on operations at Warton Aerodrome arising from the Transmission Assets (including the environmental mitigation areas and the biodiversity benefit sites) should have been scoped into the Environmental Statement.	Not agreed
BAE.AR.6	Study Area	The aviation and radar study area is appropriate for the	See BAE Systems' position in respect of BAE.AR.2 – BAE Systems disagrees with the Applicants'	Not agreed

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
		receptors, sites and impacts assessed.	<p>approach (with a reduced study area of 2.5km having been adopted by the Applicants).</p> <p>In accordance with CAP378 and CAP772, the impact on communications, navigation and surveillance equipment is required to be assessed within a 6km radius of Warton Aerodrome. Furthermore, wildlife hazard risk (including from bird strike) is required to be considered where it has the potential to occur within a 13km radius.</p>	
BAE.AR.7	Project design envelope	Volume 3 of the ES, Chapter 11: Aviation and Radar (APP-130) has identified, described and assessed the maximum design scenario for the EIA including the parameters for cranes and height of the substation buildings.	[BAE Systems' position TBC – pending outcome of safeguarding assessments]	Not agreed
BAE.AR.8	Assessment Methodology	The sensitivity criteria for aviation and radar receptors has been correctly identified and sufficiently described within Volume 3 of the ES, Chapter 11: Aviation and Radar (APP-130).	See BAE Systems' position in respect of BAE.AR.2.	Not agreed
BAE.AR.9	CEA assessment Methodology	The list of projects included in the Cumulative Effects Assessment in the ES is agreed.	[BAE Systems' position TBC – pending agreement of the Applicants' impact assessment/s relating to Warton Aerodrome; the Applicants' EIA includes no such assessment –	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
			whether in project alone or cumulative impact terms]	
BAE.AR.10	Assessment of the effects from the project alone	There will be no significant effects on aviation assets operated by BAE Systems in EIA terms for the Transmission Assets alone.	[BAE Systems' position TBC – pending agreement of the findings of the Applicants' impact assessment/s relating to Warton Aerodrome; the Applicants' EIA includes no such assessment – whether in project alone or cumulative impact terms]	Not agreed
BAE.AR.11	Assessment of the effects from the project cumulatively with other projects	There will be no significant effects on aviation assets operated by BAE Systems in EIA terms for the Transmission Assets cumulatively with other plans and projects.	[BAE Systems' position TBC – pending agreement of the findings of the Applicants' impact assessment/s relating to Warton Aerodrome; the Applicants' EIA includes no such assessment – whether in project alone or cumulative impact terms]	Not agreed
BAE.AR.12	Mitigation and Monitoring	The mitigation measures and monitoring outlined in Volume 3 of the ES, Chapter 11: Aviation and Radar (APP-130) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided.	[BAE Systems' position TBC – pending agreement of the findings of the Applicants' impact assessment/s relating to Warton Aerodrome and the identification and securing of suitable mitigation and management measures, as well as monitoring during the lifetime of the OWF; the Applicants' EIA includes no such assessment – whether in project alone or cumulative impact terms]	Not agreed
<b>Bird Strike Risk</b>				
BAE.AR.13	Onshore ecology Surveys	The scope of the onshore ecology surveys (including species, survey coverage and survey effort) is appropriate to identify important ecological	[BAE Systems' position TBC – clarification required of the surveys being referred to – rather than the ES, is the relevant document the Baseline Bird Report submitted at D3?]	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
		features. The surveys have been undertaken in accordance with the appropriate methodologies.		
BAE.AR.14	Onshore and intertidal ornithology surveys	The scope of the onshore and intertidal ornithology surveys (including species, survey coverage and survey effort) is appropriate to identify important ornithological features. The surveys have been undertaken in accordance with the appropriate methodologies.	[BAE Systems' position TBC – clarification required of the surveys being referred to – rather than the ES, is the relevant document the Baseline Bird Report submitted at D3?]	Ongoing point of discussion
BAE.AR.15	Mitigation and monitoring	The proposed location of the ecological mitigation and biodiversity benefit areas have taken into account the proximity to Warton Aerodrome.	BAE Systems disagrees with the Applicants' approach. The "Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas" Statement (Doc Ref. S_D2_13) identifies four guiding principles for site selection, all of which concern ecological considerations. Proximity to aviation infrastructure/interests is stated to have formed part of the Applicants' " <i>refinement exercise</i> ". It is BAE Systems' position that the Applicants have attributed a disproportionate amount of weight to ecological considerations in locating the environmental mitigation areas and the biodiversity benefit sites, and that the account taken of impacts on aviation infrastructure/interests by the Applicants was cursory and entirely inadequate.	Not agreed

Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
BAE.AR.16	Outline Wildlife Hazard Management Plan	<p>The mitigation and management measures, and the monitoring proposals, contained in the outline Wildlife Hazard Management Plan (oWHMP) (REP3-065] are considered to adequately address the risk of bird strike arising at Warton Aerodrome from the Transmission Assets (including the environmental mitigation areas and biodiversity benefit sites).</p> <p>It is further considered that the implementation of the aforesaid measures will enable BAE Systems to continue to comply with the terms of its licence (granted by the Civil Aviation Authority) and to discharge its duty with regard to the adequate management of wildlife hazard risk as required by CAP772.</p>	[BAE Systems' position TBC – further discussion required between the Applicants and BAE Systems regarding the oWHMP].	Ongoing point of discussion
BAE.AR.17	DCO Requirement	Requirement 12 of the draft DCO requires the submission of an Environmental Management Plan, including a WHMP, the details of which are required to be approved in consultation with BAE Systems.	[BAE Systems' position TBC – further discussion required between the Applicants and BAE Systems regarding the wording of Requirement 12, together with the deeming provisions contained in paragraphs 4(3), 5(1) and 5(2) of Schedule 12 to the draft DCO. Furthermore, BAE Systems is liaising with Defence Infrastructure Organisation regarding	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	BAE Systems' position	status
		The Applicants note that BAE Systems have requested that the Ministry of Defence also be included as a named consultee in Requirement 12. The Applicants are considering this request but note that BAE Systems retain the ability to consult with the Ministry of Defence within their own consultation timeframes as outlined in Schedule 12 paragraph 4(3), 5(1) and 5(2) of the draft DCO (REP3-009).	the role of the Ministry of Defence in the discharge of Requirement 12]	
<b>Aerodrome Safeguarding</b>				
BAE.AR.20	Safeguarding assessment	The Applicants have provided sufficient information to BAE Systems in order to enable the necessary safeguarding assessments to be undertaken at Warton Aerodrome in line with CAP738 guidance.	[BAE Systems' position TBC – further discussion required between the Applicants and BAE Systems regarding the scope and funding of any required safeguarding assessments]	Ongoing point of discussion
<b>Solar Farm Protections</b>				
BAE.AR.22	Protective provisions	Schedule 10 Part 1 of the draft DCO (REP3-009[]) secures protective provisions for the benefit of the operator of Browns Lane Solar Farm (as an electricity statutory undertaker).	[BAE Systems' position TBC – further discussion required between the Applicants and BAE Systems regarding the protective provisions proposed and the status of discussions between the Applicants and the operator of Browns Lane Solar Farm]	Ongoing point of discussion