1. Purpose of this document

1.1 The Examining Authority (ExA) issued its First Written Questions to the Applicant and other Interested Parties on 18 December 2024 **[PD-011]** (“ExQ1”). Stena Line Limited (”Stena”) is responding to those questions directed to it by the ExA in the sections below.

1.2 Each question has a unique topic prefix identifier (capital letters), a reference number which starts with 1 (indicating that it is from ExQ1) followed by the relevant question number.

2. Broad, General and Cross-Topic (GEN)

ExQ1	Question to:	Question	Stena Line's Response
1GEN1	All Parties	**National Planning Policy Framework** A replacement National Planning Policy Framework was published on 12 December 2024. All parties are invited to make any comments they wish as to how any changes within this document affect the consideration of the Proposed Development	Stena in content at this stage to leave any comments on the replacement NPPF to other Interested Parties bearing in mind the policy document's land side as opposed to marine emphasis. That said In the event that any other parties raise comments in respect of the changes to policy which have a bearing upon Stena's interests, then Stena reserves the right to provide a follow up response to this question at D3.
1GEN21	All Parties	**Application of s104 of the PA2008** In paragraph 171 of the revised Planning, Development Consent and Need Statement [REP1-010] the Applicant states "NPS EN-5 sets out Policies concerning electricity transmission distribution systems. It is, therefore, not relevant to the Project". However, NPS EN-5 is referenced in both ES Chapters 15 (paragraph 15.20, [REP1-034]) and 19 (paragraph 19.28, [REP1-040]). a) Having regard to the elements of offshore wind infrastructure identified within paragraph 2.8.4 of NPS EN-3, all parties are invited to give their views as to whether, for the purposes of sections 104(2)(a) or 104(3) of the PA2008, NPS EN-5 should be considered	Stena is of the view that this is not an issue that directly impacts their marine interests and is content to leave the responses required by the ExA to the Applicant and other Interested Parties.

ExQ1	Question to:	Question	Stena Line's Response
		as 'relevant national policy' or whether it should be considered to be an 'other matter' for the purposes of section 104(2)(d) of the PA2008. b) Should any party hold the view that it should be regarded for the purposes of sections 104(2)(a) or 104(3) of the PA2008, they are asked to explain why they hold that view and identify any matters that should be particularly taken into account, providing references as necessary.	

3. Draft Development Consent Order (DCO)

ExQ1	Question to:	Question	Stena Line's Response
1DC05	Those parties who would benefit from protective provisions	**Protective provisions** Could all parties who would benefit from Protective Provisions, please indicate whether they are content with the wording set out in Schedule 3 of the draft DCO [REP2-002]? If not, could the party please explain why it is not content and provide alternative wording, setting out why each and all proposed changes are necessary. Could Harbour Energy and Spirit Energy please liaise with each other to ensure that no proposed changes to respective Protective Provisions are mutually exclusive given their interests in the area.	The draft DCO does not currently include a Protective Provision for the benefit of Stena. In light of the potential impact of the Morecambe Project of Stena' business operations, however, Stena is very much of the view that a Protective Provision will be required – an approach that it has already made clear to the promoters of the Mona Project. On that basis, as a direct response to the ExA's question, Stena is of the view that a Protective Provision should in fact be provided for its benefit. As a consequence, Stena will be proposing to the Applicant a draft protective provision for inclusion in the draft DCO. On that basis, Stena would respond to the effect that it is not currently content with the contents/wording of Schedule 3 of the DCO. Whilst Stena is open to the option that an element of the mitigation that it will require may possibly be secured by way of an external bilateral agreement with the Applicant, outside of the DCO regime, at this time no such agreement exists and in any case, past experience of such negotiations on other projects does lead Stena to question whether a side agreement would actually obviate the need for a protective provision which offers the recipient the necessary statutory protection.

4. Shipping and Navigation (SN)

ExQ1	Question to:	Question	Stena Line's Response
SN6	The Applicant Stena Line	**Ferry routing** **a)** Figure 44: Impact on Ferry Routing of Appendix 14.2 [APP-074] sets out alternative routes, and in particular the Stena Line route. It is noted that the 'Future case' route, for the north of the Isle of Man route, dog-legs around the Morecambe and Morgan proposed OWFs. Could the Applicant explain why this routing was chosen as opposed to, say, travelling to the east of the Proposed Development and then heading in a northwest direction between the two proposed OWFs and the existing arrays? Does Stena Line have any comments on this?	Stena's position regarding routing in the event of its passage being displaced by the four (including Mooir Vannin) proposed windfarm projects in the area is that the safest most economical alternative route passes west of Morecambe, north of Morgan and east of Mooir Vannin. A passage to the east of Morecambe would require passing to the east of the Calder gas field and it should be highlighted that here are large shallow patches of sea off Blackpool. This alternative route still cumulatively increases the passage between Belfast and Liverpool by 5.5 Nm. and would clearly incur additional time, fuel and environmental penalties for our operations. It should be noted that Stena operates strategic direct routes for commercial and lifeline ferries both to meet customer requirements and operational and business exigencies. It is self-evident that these will be disrupted by the construction and operation of the Morecambe Project. Stena notes that the Applicant's relies on the National Policy Statement for Renewable Energy Infrastructure (EN-3) as the basis to justify the interference with Stena's operations, on the basis that 'strategic routes' can be disrupted provided 'the site selection has been made with a

			view to avoid or minimise' the disruption (as reported in the Statement of Common Ground between the parties [REP1-062]). Stena questions, however, whether in doing so the Applicant has in fact selected the route taking into account the requirement for '*disruption or economic loss to the shipping and navigation industries' to be 'minimised'* and if pursued, that any residual likely adverse effects to major commercial navigation routes be given '*substantial weight'* in its decision making by the Secretary of State, as explained in National Policy Statement EN-3 at paragraphs 2.8.328 – 2.8.329 (copied below), which clarify the position - *"2.8.328 The Secretary of State should be* ***satisfied that the site selection has been made with a view to avoiding or minimising disruption or economic loss to the shipping and navigation industries,*** *with particular regard to approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferries74 and recreational users of the sea.* *2.8.329 Where after carrying out a site selection, a proposed development* ***is likely adversely to affect major commercial navigation routes, for instance by causing appreciably longer transit times, the Secretary of State should give these adverse effects substantial weight in its decision making****." (****Our emphasis****)*

1SN7	The Applicant Shipping companies	**Adverse weather** **a)** Could the Applicant and the various shipping companies set out their understanding of what would constitute 'adverse weather'? **b)** Could the same parties identify the frequency of such effects, number of days per year, with any particular markers for when this occurs. Should different effects, for example on different routes, be occasioned by specific different 'adverse weather' events, could these please be identified, along with likely frequency of such events.	**a)** Could the Applicant and the various shipping companies set out their understanding of what would constitute 'adverse weather'? While the Stena line fleet is built to the highest standards they are still invariably impacted by the effects of the sea. While its vessels can make crossings in all but the most extreme sea states it must be noted that passengers, particularly those who are elderly and who make up a sizable demographic in Stena's passenger numbers tend to have a significantly higher number of accidents and medical incidents during periods of adverse weather. Similarly while Stena's vessels are designed for such weather, freight units such as curtain sided trailers, despite being secured to the vehicle decks are known to have their content to shift inside causing damage. In summary, while not an exact science, when beam seas of more than 3m significant seas are encountered without being countered then negative consequences may be anticipated. Events such as this currently are rare as Masters have the available sea room to use weather

			routing measures but this will inevitably reduce should the windfarms be consented and constructed. **b)** Could the same parties identify the frequency of such effects, number of days per year, with any particular markers for when this occurs. Stena Line accepts the meteorological data as supplied by the applicant in 5.3.1 Wind and Wave of their "Appendix 14.2 Cumulative Regional Navigation Risk assessment". It is noted, however, that there appears to be a trend toward more significant weather events being experienced. For example the 2023-2024 storm season started exceptionally active, with seven named storms from September to December - the highest number since naming began in 2015. **c) Should different effects, for example on different routes, be occasioned by specific different 'adverse weather' events, could these please be identified, along with likely frequency of such events.** While meteorology is a science, a vessels master's approach to mitigation measures are more akin to an art developed through years of experience to ensure vessels are kept safe in adverse seas. The passage North of the Isle of Man is Stena's adverse route of choice as the predominant weather encountered in

			the area is from the Southwest. The vessels' course line between the two ports are unfortunately Northwest / Southeast which is 90 degrees offset to predominant weather. Vessels by their nature unfortunately tend to roll when significant seas are experienced on the "beam" (90 degrees either side). In worse case scenarios vessels can develop a synchronous roll where each subsequent wave increases the roll of the vessel. This is often exacerbated by the vessel slowing in the seaway due to the weather being encountered. Effective weather routing in advance of sailing followed by taking decisive effective weather routing measures whilst on passage are generally accepted as being the best ways to mitigate excess motion in vessels. When vessels are constrained in taking weather routing measures due to the available sea room then delayed sailings or whole cancellation of crossings may be the only alternatives remaining for the reasonable master. Currently Stena Line would only cancel sailings on this route in single figures each year, with the number of delayed sailings due to weather being double that. The cumulative presence of four windfarms on both sides of the passage will not be fully known until they are actually constructed however it is reasonable to believe that this will appreciably increase for the reasons mentioned above.