



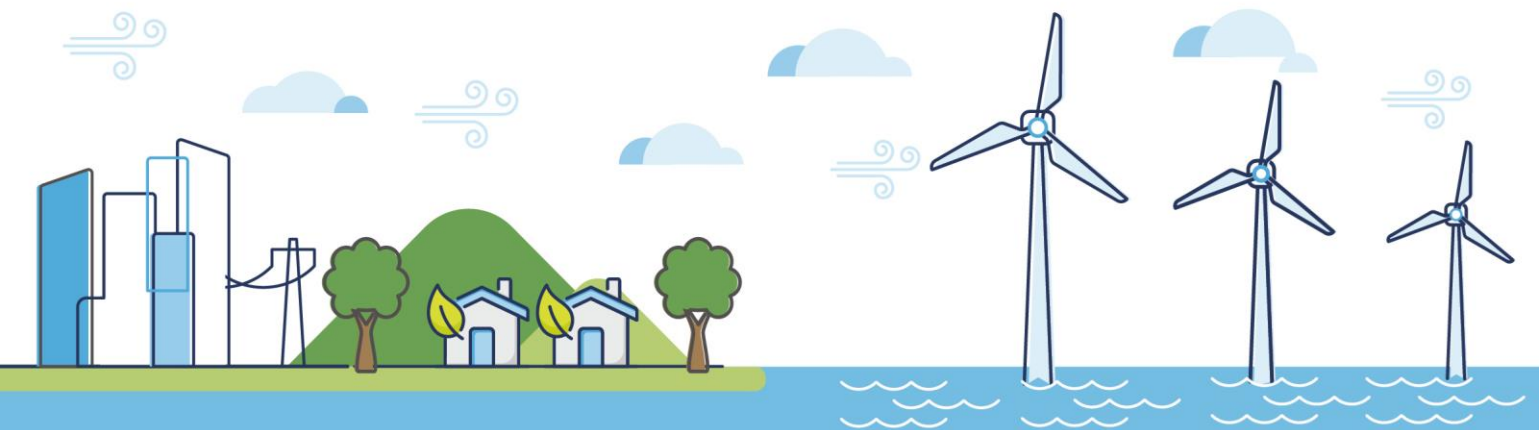
# **Morecambe Offshore Windfarm: Generation Assets Examination Documents**

## **Volume 9**

### **Draft Statement of Common Ground with Isle of Man Steam Packet Company**

Document Reference: 9.8

Rev 02



## Document History

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## Glossary of Acronyms

AfL	Agreement for Lease
AIS	Automatic Identification System
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
IoM	Isle of Man
IoMSPC	Isle of Man Steam Packet Company
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
SoCG	Statement of Common Ground
TSS	Traffic Separation Scheme
UK	United Kingdom
WTG	Wind Turbine Generator

## Glossary of Units

km <sup>2</sup>	square kilometre
MW	Megawatt

## Glossary of Terminology

Agreement for Lease (AfL)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.



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# 1 Introduction

## 1.1 Overview of the Project

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The windfarm was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the windfarm was received in 2023.
3. The AfL comprises an area of up to 125km<sup>2</sup> and reflects the windfarm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km<sup>2</sup>.
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSPs), and possible platform link cables to connect OSP(s)).
5. A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

## 1.2 Purpose of this document

6. This draft Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from the Isle of Man Steam Packet Company (IoMSPC). 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 for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. The need for a SoCG between the Applicant and the IoMSPC is set out in Section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23 September 2024. The SoCG will be updated during the Examination and submitted at the Deadlines indicated in the Rule 6 letter.
8. This draft SoCG has been structured to reflect topics of the DCO Application which are of interest to IoMSPC. The IoMSPC are a national shipping line



owned by the IoM Government, operating ferry services to the Isle of Man from Heysham, Liverpool, Dublin, and Belfast.

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

*Table 1.1 Documents relevant to the draft SoCG*

Topic/Chapter	PINS Reference
Draft DCO	APP-012
Chapter 14 Shipping and Navigation	APP-051
Appendix 14.1 Navigation Risk Assessment (NRA)	APP-073
Appendix 14.2 Cumulative Regional Navigation Risk Assessment (CRNRA)	APP-074
Chapter 19 Human Health	APP-056
Chapter 20 Socio-economics, Tourism and Recreation	APP-057

## 1.3 Consultation

### 1.3.1 Pre-application

12. The Applicant has engaged with the IoMSPC on the Project during the pre-application process, both in terms of informal non-statutory engagement and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
13. The IoMSPC provided comments on the PEIR on 1 June 2023 as part of the statutory consultation process.
14. The Applicant has engaged Shipping and Navigation consultees including the IoMSPC in extensive regional consultation throughout the pre-application process via the Marine Navigation Engagement Forum (MNEF) as described in **Table 2.1** in co-ordination with the Mona Offshore Wind project and Morgan

Generation Offshore Wind project Round 4 Projects, as well as the Morgan and Morecambe Transmission Assets.

15. Further details of this topic and relevant consultation held to date can be found in the Consultation Report (APP-015).

### 1.3.2 Post-application

16. The Applicant is committed to ongoing post-application engagement with the IoMSPC. Following submission of the Application, meetings have been established as detailed to date in **Table 2.1**.

### 1.3.3 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters

17. In order to easily identify whether a matter is 'agreed', 'not agreed' or 'in discussion', the colour coding system set out in **Table 1.2** has been used.
18. Details on specific matters that are 'Agreed', 'Not Agreed' or 'In Discussion' are presented in **Table 2.2**.

*Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters*

Position status	Position colour coding
<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 the IoMSPC is not considered to result in a material impact to the assessment conclusions.	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 the IoMSPC 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' or 'not agreed' and is a matter where further discussion is required between parties, for example, final wording of DCO conditions or where further information sharing/clarification is required.	In Discussion

## 2 Statements of Common Ground

19. **Table 2.1** provides a summary of the consultation undertaken to date in relation to shipping and navigation with the IoMSPC. Thereafter, **Table 2.2**

sets out the topics agreed, in discussion or not agreed with the IoMSPC as informed by the consultation and information exchanged between the Applicant and the IoMSPC during the pre-application and examination phases of the DCO Application.

*Table 2.1 Summary of consultation*

Date	Contact type	Owner	Topic
<b>Pre-application</b>			
29 November 2021	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project and proposed future engagement with the IoMSPC and IoM Territorial Sea Committee.
7 February 2022	Online meeting	Applicant	Online meeting to provide an overview of the Scoping Report, key impacts to ferry operations and agree ways forward for Navigation Risk Assessment (NRA) methodology for the Project.
9 February 2022	Online meeting	Applicant	Online meeting to provide an overview of Scoping Report, key impacts and agree ways forward for NRA methodology for the Project.
6 May 2022	MNEF online meeting	Applicant	Online meeting to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
20 and 21 July 2022	Bridge simulations	Applicant	Bridge Simulation Preparations for the cumulative assessments with the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
9 August 2022	Online meeting	Applicant	Online meeting with ferry operators, Maritime and Coastguard Agency, Trinity House and Chamber of Shipping to provide an update on shipping and navigation project timeline and upcoming assessments. Also, to present ferry operator passage plans, alongside (Automatic Identification System ((AIS)) data and refine understanding of passage

Date	Contact type	Owner	Topic
			planning and adverse weather routeing.
16 to 19 August 2022	Bridge simulations	Applicant	Bridge Simulations for the cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
10 October 2022	MNEF online meeting	Applicant	Online meetings to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
12 October 2022	PEIR Hazard workshop	Applicant	In-person hazard workshop, attended by representatives from ferry operators, regulators, commercial bodies, IoM Government, oil and gas, ports, fishing communities and recreational users
18 January 2023	MNEF online meeting	All Project Applicants	Online meeting to discuss navigation safety and cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets pre-PEIR. Project update on boundary amendments and how commitments will be tested post PEIR.
1 June 2023	Response to statutory consultation including the PEIR	IoMSPC	IoMSPC response to the PEIR, raising concerns over cumulative safety issues.
13 to 15 September 2023	Bridge simulations	Applicant	Update to Bridge Simulations for the cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets to inform the ES. The updated simulations reflected the site boundary changes made since PEIR by the three projects.
21 September 2023	MNEF online meeting	Applicant	Online meeting to provide project updates and review of site boundary changes made since PEIR by the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.

Date	Contact type	Owner	Topic
28 and 29 September 2023	Hazard Workshop	Applicant	In-person hazard workshop to inform the updated NRA/CRNRA for the Environmental Statement (ES), attended by representatives from ferry operators, regulators, commercial bodies, oil and gas, ports, fishing communities and recreational users.
11 December 2023	Online meeting	Applicant	Online meeting to provide project updates, including review of engagements and assessments, and cumulative impacts associated with the Moir Vannin Offshore Wind Farm.
8 February 2024	MNEF online meeting	Applicant	MNEF online meeting to provide Project updates.
1 March 2024	Online meeting	Applicant	Online meeting with IoMSPC to provide a Project update and to discuss any residual concerns.
<b>Post-application</b>			
19 September 2024	Online meeting	Applicant	Discussion on Relevant Representation and SoCG for the Project.
31 October 2024	Online meeting	Applicant	Discussion on SoCG for the Project.
14 January 2025	Online meeting	Applicant	Discussion on SoCG for the Project.
14 February 2025	Online meeting	Applicant	Discussion on SoCG for the Project.

*Table 2.2 Topics agreed, in discussion or not agreed with the IoMSPC in relation to shipping and navigation*

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
<b>Environmental Impact Assessment (EIA) and NRA</b>				
IoMSPC 1	Consultation	IoMSPC has been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
IoMSPC 2	Policy and planning	The assessment has identified all appropriate plans, policies and guidance relevant to shipping and navigation and has given due regard to them within the assessment..	The IoMSPC has no comments in respect to assessment methodologies and trusts the Applicant has stated appropriate plans and policies have been followed.	Agreed
IoMSPC 3	Baseline environment	Sufficient data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
IoMSPC 4	Assessment methodology	The Formal Safety Assessment approach utilised within the is deemed appropriate for the purposes of predicting potential effects on IoMSPC vessel routeing.	The IoMSPC has no comments in respect to assessment methodologies and trusts the Applicant has stated appropriate guidance and methods have been followed.	Agreed
IoMSPC 5		Hazard Workshops (for the NRA, and for the CRNRA) were undertaken allowing adequate stakeholder input into the risk assessments (outlined in Table 43 of the NRA (APP-073), and Appendix B of the CRNRA (APP-074)) and are reflected within the conclusions laid out in Section 11 of the NRA (APP-073) and Section 9 of the CRNRA (APP-074).	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
IoMSPC 6		The assessment of effects in the ES (Section 14.7 of Chapter 14 - Shipping and Navigation (APP-051)) has been undertaken based on an appropriate maximum design scenario (outlined in Table 11 in the NRA (APP-073)) for shipping and navigation to identify any effects to the IoMSPC operations.	Agreed	Agreed
IoMSPC 7	Assessment of the Project-alone impacts	Hazards identified as relevant to the Project have been appropriately identified and assessed within the NRA (APP-073).	Agreed	Agreed
IoMSPC 8		The potential effects identified in ES Chapter 14 Shipping and Navigation (APP-051) represent a comprehensive list of potential effects on shipping and navigation from the Project, and considers appropriate impacts on IoMSPC routes.	The IoMSPC has no comments in respect to scope of effects and trusts the Applicant has stated appropriate effects have been included.	Agreed
IoMSPC 9		All identified hazards have been assessed as either Broadly Acceptable or Tolerable (and As Low As Reasonably Practicable (ALARP)) for the Project-alone assessment and there are no unacceptable hazards.	Agreed	Agreed
IoMSPC 10		The Project alone would not interfere with the use of recognised sea lanes (such as Traffic Separation Schemes (TSS)) (the TSS Liverpool Bay and	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
		TSS Off Skerries) essential to international navigation.		
IoMSPC 11		The Project alone does not have significant effects on IoMSPC lifeline ferry services (including Liverpool – Douglas and Heysham – Douglas routes).	Agreed	Agreed
IoMSPC 12		All other effects (including impacts on radar and communications and search and rescue) have been assessed as not significant in EIA terms with the proposed mitigation measures in place.	Keep the highlighted text. IoMSPC cannot comment on SAR until plans have been confirmed, however IoMSPC note that plans will be developed subject to approval by the MCA.	Agreed
IoMSPC 13	Assessment of cumulative effects	All relevant cumulative projects have been identified and considered within the shipping and navigation assessments.	Agreed	Agreed
IoMSPC 14		Hazards and impacts relevant to the Project and cumulative projects have been appropriately assessed within the shipping and navigation assessments, including the CRNRA (APP-074).	Agreed	Agreed
IoMSPC 15		All except two hazards for the cumulative assessment that also included Mooir Vannin have been assessed as acceptable. The two hazards assessed as unacceptable are not materially	Agreed	Agreed



Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
		caused (or risk increased) by the Morecambe project.		
IoMSPC 16		The corridor between the Project and Mona Offshore Wind Project is considered to be acceptable. Post construction monitoring will be undertaken and the MNEF will be continued to facilitate further engagement as required post construction.	The corridor between Mona and Morecambe could potentially affect safety of navigation with other vessels and safety of navigation in adverse weather. Narrower corridors may also cause vessels to slow down to comply with COLREG Rule 6 which in turn will lead to schedule disruption.  It is expected that the monitoring proposed will allow risk control measures to be reviewed and the MNEF will facilitate discussions as appropriate as/if they arise.	Agreed
IoMSPC 17		The Project in combination with cumulative projects would not interfere with the use of recognised sea lanes (the TSS Liverpool Bay and TSS Off Skerries) essential to international navigation.	Agreed	Agreed
IoMSPC 18		The Project does not contribute to any significant cumulative impacts on IoMSPC routes, with these impacts being driven by other cumulative projects, as such no significant impacts to IoMSPC normal and adverse weather routes are identified within the Chapter 14 Shipping and Navigation (APP-051).  No IoMSPC adverse weather routes intersect the Morecambe windfarm site. The IoMSPC route between	The corridor between Mona and Morecambe could potentially affect safety of navigation with other vessels and safety of navigation in adverse weather. Narrower corridors may also cause vessels to slow down to comply with COLREG Rule 6 which in turn could lead to schedule disruption.  The IoMSPC opines for conventional passenger ferries and high-speed passenger craft the risk for lifeline passenger ships passing other vessels within the corridor should be LOW (MGN 654 Annex 2) for x2	Not Agreed – No material impact (in respect to the contribution of the Morecambe Project to cumulative effects)

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
		<p>Liverpool and Douglas in typical weather routes to the southwest to more sheltered water and, with the Mona Array Area in place, the master would likely choose to pass to the southwest of the Mona Array Area, rather than transiting closer to the Morecambe windfarm site, with or without the presence of Morecambe Offshore Windfarm.</p>	<p>vessels passing each other in the corridor while maintaining a safe passing distance for each vessel and the wind farms either side of the corridors.</p> <p>Such corridors limit a vessel's ability to weather route which increases the likelihood of cancellation leading to economic disruption of goods and services.</p> <p>The Master may opt to choose a weather route to the west or east of the Mona windfarm site, or cancel the sailing according to the forecasted weather and sea conditions. A weather route to the east of Mona means sailing on restricted heading in the Mona/Morecambe corridor that may be uncomfortable to passengers and present increased risk to the efficacy of the vehicle and freight securings.</p> <p>Where the prevailing weather and sea conditions dictate a safer and more comfortable weather routing option to the west of Mona is preferable to the Morecambe/Mona corridor, such routing will significantly increase the passage time and distance subsequently leading to extra fuel consumption and emissions output. Implementing such a routing option will lead to significant schedule disruption or the possibility of service cancellation.</p>	

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
IoMSPC 19	Mitigation	<p>The mitigation measures described within Section 14.3.3 and 14.7 of ES Chapter 14 Shipping and Navigation (APP-051) and Section 4.9 and 9.8 of the NRA (APP-073) are appropriate in relation to IoMSPC and considering the contribution of the Project to the cumulative effects.</p> <p>Emergency Towing Vessel (ETV) provision was not adopted and was discussed at the hazard workshops and given that vessel allisions were scored as Medium Risk and relatively unlikely, therefore the very high cost of procuring and operating an ETV was disproportionate given the level of risk identified.</p>	<p>Recognition must be given to the Morecambe project in isolation or cumulatively with other proposed windfarm projects and existing structures in the vicinity, that there exists a risk whereby a vessel suffering complete power loss may subsequently drift or drag anchor in the direction of the windfarm array. The Isle of Man Steam Packet opine reasonable consideration and response measures to such circumstances must be included within the MCA approved emergency plan.</p>	Not Agreed – No material impact (in respect to the contribution of the Morecambe Project to cumulative effects)
IoMSPC 20	Transboundary impacts	No likely significant transboundary effects have been identified for the Project, no significant impact has been identified for passenger routes operating to Ireland.	Agreed	Agreed
<b>Other</b>				
IoMSPC 21	Human Health	The Project does not materially contribute to significant effects on IoMSPC ferry routeing and no associated indirect significant human	The IoMSPC defer to the IoM Territorial Sea Committee for matters relation to human health	N/A

Topic/ref.	Discussion Point	Applicant's position	IoM Steam Packet Company's position	Position summary
		<p>health effects have been identified on human health receptors.</p> <p>Due consideration is given within the Human Health Chapter (APP-056).</p>		
IoMSPC 22	Socio-economics	<p>The Project does not materially contribute to effects on IoMSPC ferry routeing and no associated indirect significant socio-economic effects have been identified on socio economic receptors.</p> <p>Due consideration is given within the Socio-economics, Tourism and Recreation chapter (APP-057).</p>	<p>The IoMSPC agree that the Morecambe project alone does not effect IoMSPC routeing.</p> <p>Cumulative with other projects - A corridor is created with the proposed Mona field. The width of the corridor will directly affect safety of navigation with other vessels and safety of navigation in adverse weather. Such corridors limit a vessel's ability to weather route which increases the likelihood of cancellation leading to economic disruption of goods and services. The IoMSPC defer to the Territorial Sea Committee for matters relation to socio-economics, tourisms and recreation.</p>	N/A

### 3 Signatures

20. The above draft SoCG is agreed between the IoM Steam Packet Company and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the IoM Steam Packet Company	
Signed:	
Print Name:	
Job Title:	
Date:	
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)

Morecambe Offshore Windfarm Ltd (2024) Consultation Report (APP-015)

Morecambe Offshore Windfarm Ltd (2024) Draft DCO (APP-012)

Morecambe Offshore Windfarm Ltd (2024) Chapter 14 Shipping and Navigation (APP-051)

Morecambe Offshore Windfarm Ltd (2024) Appendix 14.1 Navigation Risk Assessment (APP-073)

Morecambe Offshore Windfarm Ltd (2024) Appendix 14.2 Cumulative Regional Navigation Risk Assessment (APP-074)

Morecambe Offshore Windfarm Ltd (2024) Chapter 19 Human Health (APP-056)

Morecambe Offshore Windfarm Ltd (2024) Chapter 20 Socio-economics, Tourism and Recreation (APP-057)