

Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with the Maritime and Coastguard Agency

Document Reference: 9.9

Rev 03



Document History

Doc No	MOR001-FLO-CON-ENV-SCG-0009	Rev	03
Alt Doc No	PC1165-RHD-SG-XX-CO-Z-0010		
Document Status	Approve for Use	Doc Date	18 February 2025
PINS Doc Ref	9.9	APFP Ref	n/a

Rev	Date	Doc Status	Originator	Reviewer	Approver	Modifications
01	26 November 2024	Approve for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	n/a
02	22 January 2025	Approve for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated at Deadline 3
03	18 February 2025	Approve for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated at Deadline 4

Contents

1	Introduction	8
1.1	Overview of the Project	8
1.2	Purpose of this document.....	8
1.3	Consultation	9
1.3.1	Pre-application	9
1.3.2	Post-application.....	10
1.3.3	Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters.....	10
2	Statements of Common Ground.....	10
3	Signatures	19
4	References	20

Tables

Table 1.1 Topics included in the draft SoCG	9
Table 1.2 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters.....	10
Table 2.1 Summary of consultation	11
Table 2.2 Topics agreed, in discussion or not agreed with the MCA in relation to shipping and navigation.....	13

Glossary of Acronyms

AfL	Agreement for Lease
AIS	Automatic Identification System
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigational Risk Assessment
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
IoM	Isle of Man
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MNEF	Marine Navigation Engagement Forum
NRA	Navigational Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
TSS	Traffic Separation Schemes
UK	United Kingdom
WTG	Wind Turbine Generator

Glossary of Units

km ²	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.



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 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 125km² 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 87km².
4. The 'Project' relates to the Generation Assets of the Morecambe Offshore Windfarm (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 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 Maritime and Coastguard Agency (MCA). 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 MCA 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 Application which are of interest to the MCA. The MCA provide a 24-hour maritime and coastal search and rescue emergency coordination and response service for the

United Kingdom. The MCA also produces legislation and guidance and provides certification to ships and seafarers.

9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and the MCA 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 MCA. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and MCA.
11. **Table 1.1** lists topics and documents of the Application which are of key interest to the MCA.

Table 1.1 Topics included in the draft SoCG

Topic/Chapter	PINS Reference
Draft DCO	APP-012
Chapter 14 Shipping and Navigation	APP-051
Appendix 14.1 Navigational Risk Assessment (NRA)	APP-073
Appendix 14.2 Cumulative Regional Navigational Risk Assessment (CRNRA)	APP-074
Outline Offshore Operation and Maintenance Plan	APP-150
Outline Vessel Traffic Management Plan	APP-153

1.3 Consultation

1.3.1 Pre-application

12. The Applicant has engaged with the MCA 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 MCA provided comments on the PEIR on 31 May 2023 as part of the statutory consultation process.
14. The Applicant has engaged Shipping and Navigation consultees 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 and Morgan Round 4 Projects.
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 MCA submitted a Relevant Representation (RR-048) in July 2024 that has been used to populate this draft SoCG.
17. The Applicant is committed to ongoing post-application engagement with the MCA as described to date in **Table 2.1**.

1.3.3 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

18. 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.
19. 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
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the MCA 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
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the MCA is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
In Discussion 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

20. **Table 2.1** provides a summary of the consultation undertaken to date in relation to the draft DCO and deemed marine licence (DML). Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with the MCA as informed by the consultation and information exchanged between the

Applicant and the MCA during the pre-application and examination phases of the Application.

Table 2.1 Summary of consultation

Date	Contact type	Owner	Topic
Pre-application			
7 January 2022	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project, indicative timelines and upcoming survey plan and methodology.
3 March 2022	Online meeting	Applicant	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.
14 July 2022	Scoping response	MCA	Details matters of relevance to the MCA.
23 to 25 August 2022	Navigation Simulations	Applicant	Full Bridge Navigation Simulations with Stena Line masters, with MCA in attendance, to assess safety of navigation for existing routes and deviated routes for the PEIR.
9 August 2022	Online meeting	Applicant	Meeting with ferry operators, MCA, 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 planning and adverse weather routing.
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	Applicant	Online meeting to discuss navigation safety and cumulative assessments with the Project, Mona Offshore Wind Project

Date	Contact type	Owner	Topic
			and Morgan Offshore Wind Project Generation Assets pre- PEIR. Project update on boundary amendments and how commitments will be tested post PEIR.
23 to 25 May 2023	Navigation Simulations	Applicant	Full Bridge Navigation Simulations with Stena Line masters, with MCA in attendance, to assess safety of navigation for existing routes and deviated routes.
31 May 2023	Response to statutory consultation including the PEIR	MCA	MCA response to the PEIR.
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.
28 and 29 September 2023	ES 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.
19 December 2023	Online meeting	Applicant	Online meeting to provide project updates, including review of engagements and assessments, and cumulative impacts associated with the Mooir Vannin Offshore Wind Farm.
8 February 2024	MNEF online meeting	Applicant	MNEF online meeting to provide Project updates.
Post-application			
26 September 2024	Online meeting	Applicant	Discussion on Relevant Representation and Statement of Common Ground.
15 January 2025	Online meeting	Applicant	Discussion on Relevant Representation and Statement of Common Ground.

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

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
Environmental Impact Assessment (EIA)				
MCA 1	Consultation	MCA has been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
MCA 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 (see Section 14.4.1 of Volume 5, ES Chapter 14 Shipping and Navigation (APP-051) and Section 2 of Volume 5, Appendix 14.1 NRA (APP-073).	Agreed	Agreed
MCA 3	Surveys	The vessel traffic surveys were conducted in accordance with MGN654 and are therefore suitable for assessment.	Agreed	Agreed
MCA 4	Baseline environment	Sufficient data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
MCA 5	Assessment methodology	The Formal Safety Assessment approach utilised within the NRA (APP-073) (outlined in Section 2.2.2) and for the assessment of effects (Section 14.7) within the ES (APP-051) is deemed appropriate for the purposes of predicting potential effects on shipping and navigation receptors.	Agreed	Agreed
MCA 6		The quantitative risk modelling methods used within the NRA (APP-073) to assess collision and allision risk in accordance with	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
		the published NRA methodology guidance (MGN654 Annex 1).		
MCA 7		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
MCA 8		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.	Agreed	Agreed
MCA 9	Assessment of the Project-alone impacts	Hazards and impacts identified as relevant to the Project have been appropriately identified and assessed within the NRA (APP-073).	Agreed	Agreed
MCA 10		The potential effects identified ES Chapter 14 - Shipping and Navigation (APP-051) represent a comprehensive list of potential effects on shipping and navigation from the Project.	Agreed	Agreed
MCA 11		All identified hazards have been assessed as either Broadly Acceptable or Tolerable (and As Low As Reasonably Practicable	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
		(ALARP)) for the Project-alone assessment and there are no unacceptable hazards.		
MCA 12		The Project would not interfere with the use of recognised sea lanes (such as Traffic Separation Schemes (TSS)) essential to international navigation.	Agreed	Agreed
MCA 13		The impact assessment conclusions for search and rescue and emergency response are consistent with MGN654 subject to the agreement of post-consent plans with the MCA as secured within the DML (Schedule 6 of the draft DCO).	Agreed	Agreed
MCA 14		All other identified effects (including radar and communications, and recreational users) have been assessed as not significant in EIA terms with the proposed mitigation measures in place.	Offshore wind farms can potentially affect shore-based VHF radio coverage and developers are required to discuss with the MCA during the post-consent/pre-construction stage the need for providing in-field, marine band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling) that can cover the entire wind farm site and its surrounding area.	Agreed
MCA 15	Assessment of cumulative impacts	All relevant cumulative projects have been identified and considered within the shipping and navigation assessments.	Agreed	Agreed
MCA 16		Hazards and impacts relevant to the Project in combination with cumulative projects have been appropriately assessed within the shipping and navigation assessments including the CRNRA (APP-074).	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
MCA 17		All identified navigational safety hazards relating to the cumulative scenario for Morecambe, Mona and Morgan projects (including associated Transmission Assets) have been assessed as acceptable.	Agreed	Agreed
MCA 18		All except two identified hazards for the cumulative assessment that also included Mooir Vannin Offshore Wind Farm have been assessed as acceptable. The two hazards assessed as unacceptable were between Morgan and Walney and are not materially caused or risk increased by the Morecambe Project.	Agreed	Agreed
MCA 19		The Project in combination with cumulative projects would not interfere with the use of recognised sea lanes (such as TSS) essential to international navigation.	Agreed	Agreed
MCA 20		The Project in combination with cumulative projects could have infrequent potential significant effects on ferry services between Liverpool and Belfast (east of Isle of Man) in adverse weather conditions. The contribution of the Project is not considered material to the level of significance assigned, with impacts driven by the other cumulative projects.	Agreed	Agreed
MCA 21		Contribution of the Project to impacts on other ferry services routes are minor and not considered to contribute to significant safety impacts.	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
MCA 22		All other identified impacts (including impacts on search and rescue, radar and communications and recreational users) assessed for the cumulative scenario are ALARP and not significant in EIA terms with the proposed mitigation measures in place.	Agreed	Agreed
MCA 23	Mitigation	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) and CRNRA (APP-074) are appropriate. Further mitigation measures identified (but not adopted) in the NRA (APP-073) and CRNRA (APP-074) would be disproportionate. Therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.	Agreed	Agreed
MCA 24	Transboundary effects	No likely significant transboundary effects have been identified for the Project as no significant impact was identified for passenger routes operating to Ireland or Belgium.	Agreed	Agreed
Draft DCO				
MCA 25	Mitigation and management measures	The wording of conditions relevant to navigational safety within Schedule 6, Part 2, Condition 4, Condition 5, Condition 9, Condition 10, Condition 11, Condition 12, Condition 13, Condition 14, Condition 15,	While the parties agree that the wording in the draft DCO submitted at Deadline 4 is appropriate and adequate, MCA reserves the right to comment on further changes made to the draft DCO at future deadlines.	In discussion

Topic/ref.	Discussion Point	Applicant's position	MCAs position	Position summary
		Condition 16 and Condition 18 are appropriate and adequate.		

3 Signatures

21. The above draft SoCG is agreed between the MCA and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the MCA	
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)

IMO (2018). Revised Guidelines for Formal Safety Assessment (FSA) for use in the Rule Making Process MSC-MEPC.2/Circ.12/Rev.2.

MCA (2021). MGN 654 Annex 1: Methodology for Assessing the Marine Navigational Safety and Emergency Response Risks of Offshore Renewable Energy Installations (OREI).

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 Navigational Risk Assessment (APP-073)

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

Morecambe Offshore Windfarm Ltd (2024) Outline Offshore Operation and Maintenance Plan (APP-050)

Morecambe Offshore Windfarm Ltd (2024) Outline Vessel Traffic Management Plan (APP-053)