

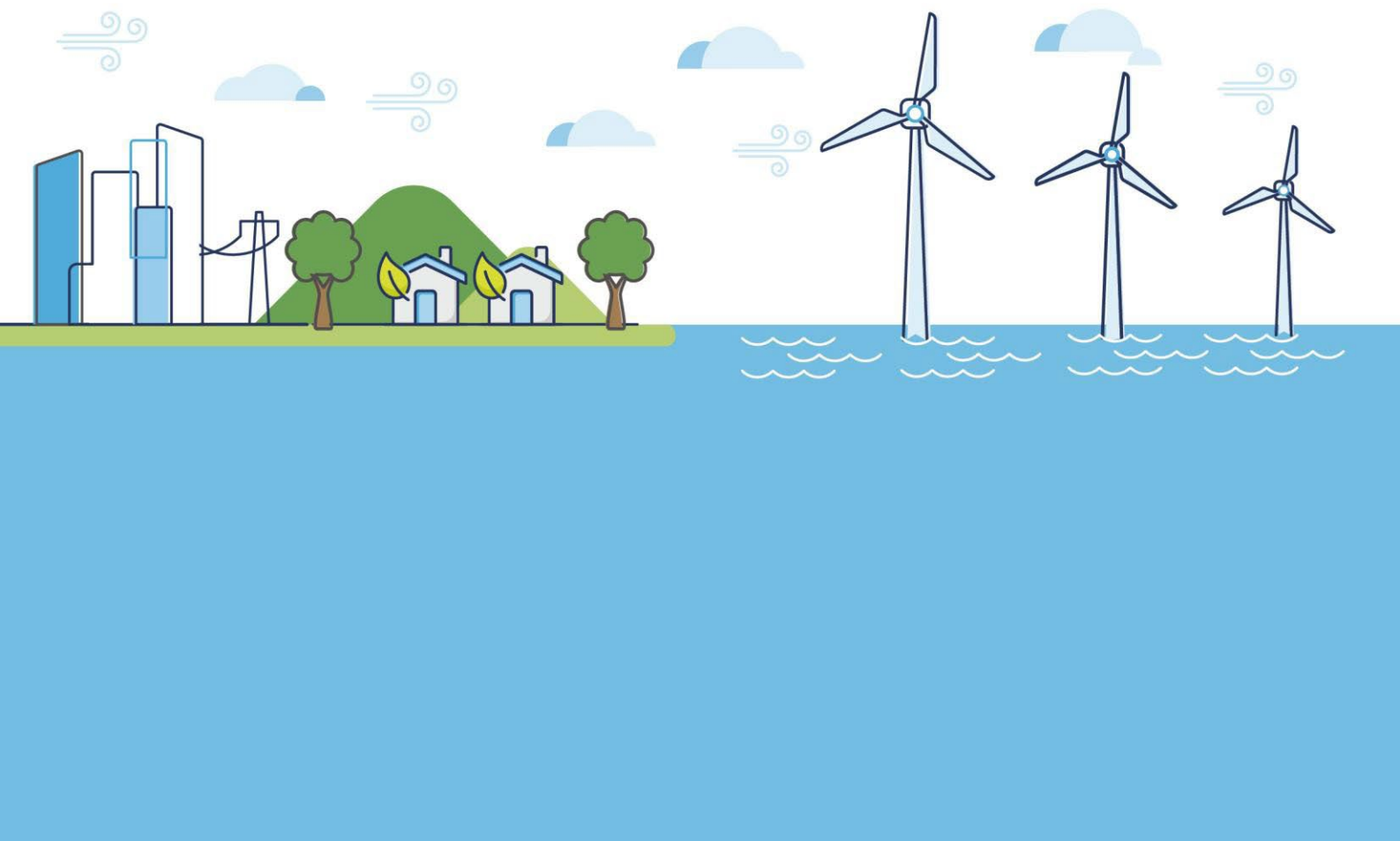
# **Morecambe Offshore Windfarm: Generation Assets Examination Documents**

## **Volume 9**

### **Statement of Common Ground with Trinity House**

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## Document History

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## Glossary of Acronyms

AfL	Agreement for Lease
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
MGN	Marine Guidance Note
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
TSS	Traffic Separation Schemes
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.



# The future of renewable energy

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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 (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 Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from Trinity House. 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 Trinity House 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 SoCG has been structured to reflect topics of the DCO Application which are of interest to Trinity House and which fall under the statutory remit of Trinity House. The Corporation of Trinity House of Deptford Strond, also known as Trinity House is the General Lighthouse Authority for England, Wales, the

Channel Islands and Gibraltar with powers principally derived from the Merchant Shipping Act 1995 (as amended). The role of Trinity House as a General Lighthouse Authority under the Act includes the superintendence and management of all lighthouses, buoys and beacons within its area of jurisdiction.

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

*Table 1.1 Topics included in the SoCG*

Topic/Chapter	Applicant Reference
Draft DCO	3.1
Chapter 14 Shipping and Navigation	5.1.14
Appendix 14.1 Navigation Risk Assessment (NRA)	5.1.14.1
Appendix 14.2 Cumulative Regional Navigation Risk Assessment (CRNRA)	5.1.14.2
Outline Offshore Operation and Maintenance Plan	6.6
In Principle Monitoring Plan	6.4

## 1.3 Consultation

### 1.3.1 Pre-application

12. The Applicant has engaged with Trinity House 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. Trinity House provided comments on the PEIR on 2<sup>nd</sup> June 2022 as part of the statutory consultation process.
14. In co-ordination with the Mona and Morgan Offshore Wind projects the Applicant has engaged shipping and navigation consultees in extensive



regional consultation throughout the pre-application process via the Marine Navigation Engagement Forum (MNEF) and hazard workshops. **Table 2.1** provides a summary of the consultation undertaken to date in relation to shipping and navigation with Trinity House. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with the Trinity House as informed by the consultation and information exchanged between the Applicant and the Trinity House during the pre-application and examination phases of the DCO Application.

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. Trinity House submitted a Relevant Representation (RR-018) in July 2024 that has been used to populate this SoCG.
17. The Applicant is committed to ongoing post-application engagement with Trinity House. Following submission of the Application, meetings have been established with Trinity House as detailed to date in **Table 2.1** provides a summary of the consultation undertaken to date in relation to shipping and navigation with Trinity House. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with the Trinity House as informed by the consultation and information exchanged between the Applicant and the Trinity House during the pre-application and examination phases of the DCO Application.

### 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
<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 Trinity House is not considered to result in a material impact to	Not Agreed – no material impact

Position status	Position colour coding
the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG.	
<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 Trinity House 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

20. **Table 2.1** provides a summary of the consultation undertaken to date in relation to shipping and navigation with Trinity House. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with the Trinity House as informed by the consultation and information exchanged between the Applicant and the Trinity House 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>			
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.
21 July 2022	Scoping response	Trinity House	Details matters of relevance to Trinity House.
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 routeing.

Date	Contact type	Owner	Topic
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 and Morgan Offshore Wind Project Generation Assets pre-PEIR. Project update on boundary amendments and how commitments will be tested post PEIR.
2 June 2023	Response to statutory consultation including the PEIR	Trinity House	Trinity House 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.
26 September 2023	Online meeting	Applicant	Online meeting to provide project update and to discuss proposed construction and operational lighting/markings around the windfarm.
18 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.
<b>Post-application</b>			
11 June 2024	Online meeting	Applicant	Discussion on the development of the turbine layout.
17 September 2024	Online meeting	Applicant	Discussion on Relevant Representation and SoCG for the Project.
8 November 2024	Online meeting	Applicant	Discussion on Relevant Representation and SoCG for the Project.

Date	Contact type	Owner	Topic
13 January 2025	Online meeting	Applicant	Discussion on Relevant Representation and SoCG for the Project.
10 February 2025	Online meeting	Applicant	Discussion on Relevant Representation and SoCG for the Project.

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

Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
<b>Environmental Impact Assessment (EIA) and NRA</b>				
TH 1	Consultation	Trinity House has been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
TH 2	Policy and planning	The assessment has identified 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
TH 3	Baseline environment	Sufficient data has been collated to appropriately characterise the baseline environment and inform the assessment.	Agreed	Agreed
TH 4	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
TH 5		The quantitative risk modelling methods used within the NRA (APP-073) to assess collision and allision risk are appropriate and in-line with best practice.	Agreed	Agreed

Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
TH 6		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
TH 7		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
TH 8		The assessment within the NRA (APP-073) and ES Chapter 14 Shipping and Navigation (APP-051) has been undertaken in line with relevant shipping and navigation legislation and guidance.	Agreed	Agreed
TH 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
TH 10		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.	Agreed	Agreed

Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
TH 11		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
TH 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
TH 13		Impacts on commercial vessel hazards and routeing, including cargo, tanker and passenger vessels would not be significant with the proposed mitigation measures in place.	Agreed	Agreed
TH 14		Impacts on search and rescue and radar and communications would not be significant in EIA terms with the proposed mitigation measures in place.	Trinity House defer to the MCA	NA
TH 15	Assessment of cumulative impacts	Relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	Agreed	Agreed
TH 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	Applicants position	Trinity House's position	Position summary
TH 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
TH 18		All except two identified hazards for the cumulative assessment that also included Mooir Vannin OWF have been assessed as acceptable.  The two hazards assessed as unacceptable were between Morgan and Walney projects and are not materially caused or risk increased by the Morecambe Project.	Agreed	Agreed
TH 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
TH 20		The Project alongside cumulative projects could have infrequent potential significant effects on ferry services between Liverpool and Belfast in adverse weather conditions. The contribution of the Project is not considered to be material to the level of significance assigned, with impacts driven by other cumulative projects.	Agreed	Agreed
TH 21		Contribution to cumulative impacts to other ferry services routes are minor and not	Agreed	Agreed



Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
		considered to contribute to significant operational impacts.		
TH 22		All other identified effects assessed for the cumulative scenario are ALARP and not significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
TH 23	Mitigation	The mitigation measures described within Chapter 14 Shipping and Navigation (APP-051), NRA (APP-073) and the CRNRA (APP 074) with regards to the Project are appropriate. Further mitigation measures as identified (but not adopted) in the NRA (APP-073) and CRNRA (APP-074) would be disproportionate.	Agreed	Agreed
<b>Draft DCO</b>				
TH 24	DCO conditions and plans	<p>The wording of clauses and conditions relevant to navigational safety within the draft DCO (APP-012), including Part 3, Clause 9, Clause 15 and Clause 16, Schedule 6, Part 2, Condition 4, Condition 5 and Condition 6 are appropriate and adequate.</p> <p>The Applicant has added micrositing (Condition 9) up to 55m in the dDCO at Deadline 4 in response to TH's response to ExQ1 (REP3-099).</p> <p>The Applicant is submitting agreed wording (including Condition 6, colouring of structures) at Deadline 4.</p>	<p>Initial comments on the draft DCO have been provided to the Applicant (see item TH 25 below). It is noted Trinity House retain that further submissions of the draft DCO through examination will be reviewed and any further comments provided (see item TH 28).</p> <p>Following our review of the draft DCO Revision 03, dated 12 December 2024, we are largely content with the drafting amendments made. However, we do request the amendment made to Schedule 6, Part 2, Condition 6(1) is revoked, as this is too prescriptive and implies that 15m is the absolute minimum height, which is not the case. We would therefore prefer the standard</p>	Agreed

Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
			wording to apply that has been used in numerous previous DCOs. We note this redrafting originated from an ExA request, and have submitted a representation into the examination at Deadline 3 on 22 January 2025. Following discussions with the Applicant there is agreement that the wording of the conditions submitted at Deadline 4 are appropriate.	
TH 25		Additional wording for Schedule 6, Part 2 and Condition 18 has been provided by Trinity House and was updated in the Draft DCO at Deadline 2.	Trinity House has provided the Applicant additional wording for Condition 18 and will review updates that are being provided by the Applicant at Deadline 2.  Following our review of the draft DCO Revision 03, dated 12 December 2024 this is now Agreed – 21/01/25	Agreed
TH 26		The details provided within the In Principle Monitoring Plan (APP-148) are suitable and will be further developed and detailed post consent.  The Applicant notes that the wording of Schedule 6, Part 2, Condition 15 and 16 was amended within the Draft DCO submitted at Deadline 2.	Trinity House has identified wording changes to Condition 15 and 16 of the draft DCO where the Vessel Traffic Management Plan are listed, which should only relate to the In Principle Monitoring Plan.  Following our review of the draft DCO Revision 03, dated 12 December 2024 this is now Agreed – 21/01/25	Agreed
TH 27		The details provided within the Outline Offshore Operations and Maintenance Plan (APP-150) are suitable and will be	Trinity House consider that Aids to Navigation is captured within general maintenance within	Agreed

Topic/ref.	Discussion Point	Applicants position	Trinity House's position	Position summary
		further developed and detailed post consent.	APP-150 as an activity that would be carried out under the lifetime of the Project.	
TH 28		<p>The draft DCO remains a live document, and further changes may be made to reflect comments from the ExA or Interested Parties at Deadline 6.</p> <p>Any further changes will be circulated to TH for review and comments.</p>	<p>While the parties agree that the wording in the draft DCO submitted at Deadline 5 is appropriate and adequate, TH reserves the right to comment on further changes made to the draft DCO at future deadlines, noting that the Applicant has indicated that they do not propose any further updates to any of the wording of conditions relevant to navigational safety.</p>	Agreed

### 3 Signatures

21. The above SoCG is agreed between Trinity House and the Applicant on the day specified below.

Signed:	[Redacted]
Print Name: Trevor Harris	
Job Title: Navigation Manager	
Date: 25/03/2025	
Duly authorised for and on behalf of Trinity House	
Signed:	[Redacted]
Print Name: Oliver Gardner	
Job Title: Consent Manager	
Date: 25/03/2025	
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)