

## Statement on behalf of Stena Line Limited (“Stena”)

### 1 Stena Position Statement

- 1.1 This statement is designed to assist the Secretary of State by explaining how discussions between the Applicant and Stena have progressed since the close of the Examination on 23 April 2025.
- 1.2 Stena has been engaged and continues to engage in ongoing negotiations with the Applicant with a view to agreeing a private Ferry Mitigation Agreement which it is hoped will resolve Stena’s outstanding objection to the Application. Negotiations have been progressing albeit there remains a substantial discrepancy to acceptable terms. Stena remains hopeful that suitable resolution can be met and currently awaits a joint position statement from the Applicant to allow negotiations to continue.
- 1.3 Until such time that the terms of the agreement have been settled to the satisfaction of Stena, it is not in a position to withdraw its objection to the Application. This is because, despite considerable discussion with the Applicant matters of mitigation for the unacceptable impacts of adverse weather routing and strategic and lifeline ferries still remain outstanding. Stena’s position, therefore, remains as set out in Stena’s Final Position Statement [REP6-066] (‘the Closing Statement’) submitted prior to the close of the Examination in April 2025.
- 1.4 Stena does wish to provide the Secretary of State with the assurance that it is seeking to resolve the outstanding points with the Applicant as a matter of priority in order that the necessary agreement can be finalised and completed.
- 1.5 In the event, however, that it is not possible to settle the terms of the agreement to the satisfaction of Stena and therefore no such agreement can be finalised, Stena has no choice but to maintain its strong objection to the Application in light of the significant operational harm that will be caused by the Project and the unacceptable increased and unmitigated risk to navigational safety – as expressed at the Examination and summarised in the Closing Statement. If negotiations cannot be completed to the satisfaction of Stena, it is considered that the application - and as a result development consent should be refused by the Secretary of State.
- 1.6 In this context it should be noted that Stena has entered into private Ferry Mitigation Agreements in respect of the Mona and Morgan offshore windfarm projects - Mona having recently been consented on 4 July 2025 – such agreements being necessary to mitigate the significant operational harm to Stena and address the increase navigation risk to its operations.
- 1.7 Indeed, the Secretary of State’s decision in Mona noted the significant adverse effect on Stena’s operations, concluding that the impact on lifeline

ferries and strategic routes should be ascribed substantial negative weight in the overall planning balance, as follows:

“4.59. For lifeline ferries, the Secretary of State agrees with the ExA **that there would be significant adverse effects in adverse weather conditions, both as a result of the Proposed Development alone and cumulatively.** The Secretary of State has noted that the Applicant and the IoMSPC have not reached agreement on a FMA. For strategic routes, **the Secretary of State agrees with the ExA that there would be a significant adverse effect on Stena’s operations between Liverpool and Belfast, however, notes that Stena have withdrawn its objection to the Proposed Development upon completion of a commercial agreement. The Secretary of State notes that EN-3 ascribes substantial weight to adverse effects on major commercial navigation routes and agrees with the ExA that these routes are covered by this policy.** The Secretary of State can see no reason to depart from that policy in this case and therefore on balance, **concludes that the impact on lifeline ferries and strategic routes should be ascribed substantial negative weight in the overall planning balance.**”

4.60. Overall, considering the contribution of the Proposed Development itself to the **matter of navigational safety risk and the effects to shipping routes, the Secretary of State considers that navigation and shipping should be ascribed moderate negative weight** in the overall planning balance.”  
(**Emphasis added**)

- 1.8 We trust this statement conveys the current situation and position of Stena and we will ensure the Secretary of State is kept informed as negotiations with the Applicant progress.

23 July 2025