

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and Chrysaor Resources (Irish Sea) Harbour Energy

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Deemed Marine Licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets, and associated activities.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

Acronyms

Acronym	Description
AIS	Automatic Identification System
CEA	Cumulative Effects Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
OSP	Offshore Substation Platform
REWS	Radar Early Warning System
SoCG	Statement of Common Ground
SWH	Significant Wave Height

Units

Unit	Description
ft	Feet
m	Metres
km	Kilometres
nm	Nautical miles
kn	Knots

1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND HARBOUR ENERGY

1.1 Introduction

1.1.1 Overview

- 1.1.1.0 This initial Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as 'the Applicant') and Chrysaor Resources (Irish Sea) Limited (hereafter referred to as 'Harbour Energy'), hereafter referred together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the Development Consent Order (DCO) application for the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the 'Morgan Generation Assets').
- 1.1.1.1 The need for a SoCG between the Applicant and Harbour Energy is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 August 2024 (PD-001).
- 1.1.1.2 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will facilitate further discussion between the parties and will be updated during the Morgan Generation Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-001).
- 1.1.1.3 This SoCG covers the following topics of relevance to Harbour Energy infrastructure at Millom West and Millom East respectively:
- Assessment of effects on Radar Early Warning System (REWS)
 - Assessment of effects on microwave communications
 - Implications on aviation due to the proximity of the Morgan Generation Assets
 - Marine corridors
 - Mutually exclusive operations.

1.2 Agreement log

1.2.1 Overview

1.2.1.0 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.1 below.

Table 1.1: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

1.2.1.1 Table 1.2 to Table 1.7 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.2) in relation to REWS, microwave communications, aviation operations, marine corridors, and mutually exclusive operations.

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1.2.2 Radar Early Warning Systems (REWS)

Table 1.2: Agreement Log between the parties on REWS.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
REWS and proposed mitigation				
HE.REWS.1	Assessment of the effects on Radar Early Warning System (REWS) from the Morgan Generation Assets for Millom West	<p>The assessment concluded no significant effects on Millom West REWS operated by Harbour Energy for the Morgan Generation Assets alone.</p> <p>The Applicant understands that the Millom West REWS has been removed and the platform will need to rely on AIS and marine radar for asset integrity. Potential effects on AIS and marine radar are assessed in Volume 4, Annex 7.1: Navigational risk assessment (APP-060). Based on the available evidence for AIS, it was concluded that no significant impact on AIS communications is anticipated (Table 1.29). Based on the available evidence for marine radar, effects may extend for up to 1.5 nm from an offshore wind farm, with intolerable impacts experienced up to 0.5 nm from an offshore wind farm (paragraph 1.8.12.4). The Millom West platform is located 1.6 nm from the Morgan Array Area.</p>	<p>The Millom West platform is now hydrocarbon free so there is no requirement for a permanent REWS. The REWS that was on the Millom West platform has been decommissioned. During removal operations, the removal vessel will be protected by its own radar system.</p> <p>The potential for the Morgan Generation Assets to generate "false positives" and/or mask the movement of vessels moving towards the Millom West platform has yet to be evaluated.</p>	Ongoing point of discussion
HE.REWS.2	Assessment of the effects on asset protection from the Morgan Generation Assets for Millom East	<p>The Applicant understands that the Millom East assets will need to rely on AIS and marine radar for asset integrity. Potential effects on AIS and marine radar are assessed in Volume 4, Annex 7.1: Navigational risk assessment (APP-060). Based on the available evidence for AIS, it was concluded that no significant impact on AIS communications is anticipated (Table 1.29). Based on the available evidence for marine radar, effects may extend for up to 1.5 nm from an offshore wind farm, with intolerable impacts experienced up to 0.5 nm from an offshore wind farm (paragraph 1.8.12.4). The Millom East assets are located 2.07 nm from the Morgan Array Area.</p>	<p>During plugging and abandoning of the Millom East wells and removal of the wellhead, any rig or removal vessel will be protected by its own radar system.</p> <p>The potential for the Morgan Generation Assets to generate "false positives" and/or mask the movement of vessels moving towards the Millom East location has yet to be evaluated.</p>	Ongoing point of discussion

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1.2.3 Microwave communications

Table 1.3: Agreement Log between the parties on microwave communications.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
Microwave communications				
HE.MC.1	Line of sight microwave communications for Millom West	The Applicant consulted with Harbour Energy during the pre-application stage to identify all Harbour Energy assets in the vicinity of the Morgan Generation Assets. Harbour Energy stated that there were no platforms with microwave communication links installed, with communications facilitated by subsea fibre optics cable (as noted in HE.MCO.1, subsea cables are all located further than 1 nm from the Morgan Array Area Order Limits).	The Millom West platform is now hydrocarbon free. The only communications link is for solar navigation aids. This is satellite based and will not be affected by the Morgan Generation Assets. Any Non-Productive Installation (NPI) working at Millom West will be able to rely on satellite communications and will not be affected by the Morgan Generation Assets.	Agreed
HE.MC.2	Line of sight microwave communications for Millom East	The Applicant consulted with Harbour Energy during the pre-application stage to identify all Harbour Energy assets in the vicinity of the Morgan Generation Assets. Harbour Energy stated that there were no platforms with microwave communication links installed, with communications facilitated by subsea fibre optics cable (as noted in HE.MCO.1, subsea cables are all located further than 1 nm from the Morgan Array Area Order Limits).	Any NPI working at Millom East will be able to rely on satellite communications and will not be affected by the Morgan Generation Assets.	Agreed

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1.2.4 Implications on aviation operations at Millom West due to the proximity of the Morgan Generation Assets

Table 1.4: Agreement Log between the parties on implications on aviation operations at Millom West due to the proximity of the Morgan Generation Assets.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
Implications of Morgan Generation Assets proximity on aviation operations at Millom West				
HE.AOMW.0.1	Definitions	Visual Meteorological Conditions (VMC) conditions: <ul style="list-style-type: none"> Day – cloud base \geq 600 ft and visibility \geq 4,000 m Night – cloud base \geq 1,200 ft and visibility \geq 5,000 m. 		Agreed
HE.AOMW.0.2		Instrument Meteorological Conditions (IMC) – when conditions are below VMC limits (but above no fly limits).		Agreed
HE.AOMW.0.3		No fly conditions: <ul style="list-style-type: none"> Day – Cloud$<$200 ft OR visibility $<$1,390 m OR SWH$>$6 OR Wind gusts$>$60 OR Icing $<$ 600 ft Night – Cloud$<$300 ft OR visibility $<$1,390m OR SWH$>$6 OR Wind gusts$>$60 OR Icing $<$ 1,100 ft. 	<p>Harbour Energy have assumed that no-fly conditions occur when any of the following conditions apply:</p> <ul style="list-style-type: none"> Cloud $<$ 300 ft in daylight or $<$ 400 ft at night Visibility $<$ 1,500 m Significant Wave Height $>$ 5.5 m Wind gusts $>$45 knots There is potential for icing $<$ 600 ft. <p>Harbour Energy recognises that, whilst aviation rules allow flying in up to 60 kn winds (the assumption used by the Applicant), take-off and landing at an offshore installation is only possible when an emergency rescue vessel could be deployed. This limits flying to when winds are below 45 knots and significant wave height less than 5.5 m (per Offshore Energy UK document: "OEUK Guidelines for the Management of Helideck Operations" Issue 7, April 2024). Harbour Energy's position will result in more conditions being classified as no fly, which will affect the current baseline and thus result in calculation of marginally less reductions due to the wind farm than would be calculated by the Applicant.</p>	Not agreed, but not material
HE.AOMW.1	Assessment methodology	The Civil Aviation Authority (CAA) is considering a regulatory change for operations within 3 nm of wind farms,	New rules adopted by helicopter operators and expected to be introduced by the CAA would limit any flying within 3 nm	Not agreed,

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
	approach – 3 nm rules	<p>increasing the Day VMC limits from the current cloud base of 600 ft to 700 ft, with an increase in visibility from the current 4,000 m to 5,000 m.</p> <p>Additionally, only Day VMC approaches and departures from a helideck would be permitted within 3 nm of a wind farm.</p> <p>The Applicant has used this as a worst case assumption in assessing the impact of helicopter access to adjacent helidecks.</p> <p>The Applicant understands that this regulatory change is not certain and, if progressed, could take several years.</p>	<p>of the nearest rotor tip to daylight and visual with additional requirements that visibility be ≥ 5 km and cloud base ≥ 700 ft.</p> <p>The change was considered and agreed at the August 2024 meeting of the CAA led Offshore Helicopter Safety Leadership Group (OHLG). The OHLG is tri-partite with the following membership:</p> <ul style="list-style-type: none"> • Group Director Safety and Airspace CAA (supported by relevant CAA Heads of Department) • The “accountable managers” of each of the helicopter operators • [Three] senior oil and gas industry (client) representatives appointed by the Board of Oil and Gas UK • The HSE Director of Oil & Gas UK • A senior Trade Union Representative from each of BALPA, Unite and RMT • A Step Change in Safety Leadership representative appointed by the Step Change in Safety Leadership Team • A representative from Transport for Scotland • A representative from The AAIB. 	but not material
HE.AOMW.2	Separation distance of 1.6 nm	<p>The potential impact on Harbour Energy helicopter access to support temporary decommissioning operations at Millom West is assessed in section 11.9.2 of Volume 2, Chapter 11: Aviation and radar (APP-015).</p> <p>As set out in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), the Applicant states that the distance to the Morgan Array Area is insufficient for an IMC, or night approach. Consultation with stakeholders, including helicopter operators, indicates that a distance of 1.5 nm is sufficient for a Day VMC approach and take-off.</p> <p>The assessment concluded that access will be possible for an average of 94.4% of daylight hours, in Day VMC. Flights at night and in IMC are not expected to be available, however it is understood that the majority of flights to Non-</p>	<p>Harbour Energy measure the distance from the edge of the Morgan Array Area to the Millom West platform to be 1.59 nm. The advice received by Harbour Energy from both its aviation technical advisors (AviateQ) and the helicopter operator currently providing services to Harbour Energy installations in the East Irish Sea, is that 1.59 nm would be sufficient to conduct a visual approach and landing whatever the wind direction but would be insufficient to effect a take-off towards the Morgan Array Area. Accordingly, flights would not be possible when the wind is from between 180° and 240°. In accordance with the 3 nm rules referenced above (HE.AO.1), operations would also be limited to daylight and visual.</p>	Not agreed, but not material

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
		<p>Production Installations (NPIs) carrying out decommissioning operations occur during the day. The potential impact is considered to be logistical, rather than safety related, and Search and Rescue (SAR) flights would not be affected. The potential impact is considered to be of minor adverse significance.</p> <p>The Applicant has requested the parameters used by AviateQ to substantiate Harbour Energy's position that 1.6 nm is not sufficient for Dday VMC flights. The Applicant notes that a 1.26 nm distance was considered as being sufficient for helicopter access in Day VMC operations to the Waveney platform in relation to the Sheringham and Dudgeon Extension projects, where an obstacle-free area of 1.26 nm around the platform was secured in the DCO. The Applicant notes that helicopters are currently being operated inside offshore wind farms, or to helidecks adjacent to offshore wind farms, whilst complying with the same CAT Regulations. Examples include daily flights to platforms inside the Hornsea One and Hornsea Two offshore wind farms, and regular flights to the Blythe Platform adjacent to the Dudgeon offshore wind farm. Both examples have wind turbines located 0.65 nm (1,200 m) from their helidecks. A 1,600 m radius free from obstacles around Harbour Energy's Johnston Wellheads was agreed in the Hornsea Project Four Wind Farm DCO.</p> <p>The Applicant is aware that the Millom West platform is now hydrocarbon free and the decommissioning programme for Millom West is anticipated to be completed before the installation of the wind turbine generators on the foundations, so there may not be a temporal overlap of activities. The Applicant seeks to remain engaged with Harbour Energy in order to understand the decommissioning timescales.</p>	The Applicant appears not to have assessed the distance clear of obstacles required to take-off from an installation.	
HE.AOMW.3	Calculation on current access	As set out in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), for the period 2018 to 2022, access was available for 98.7% of daylight conditions based on meteorological conditions and current regulations.	Harbour Energy's assessment yields a similar figure for the percentage of daylight conditions during Blackpool Airport operating hours which were available for flying.	Agreed

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
		<p>Considering future operations, during decommissioning a NPI, such as a jack-up platform may be positioned over Millom West. Usually, NPIs have a helideck approved for night operations. Using this as a basis for determining access prior to construction of the Morgan Generation Assets, and referring to Tables A.2 and A.3, flying to an NPI would currently be possible 98.7% of daylight and 96.7% of night conditions within airport operating hours.</p> <p>The Applicant notes the difference in methodology and is in agreement with Harbour Energy.</p>	<p>Harbour Energy agrees with the Applicant that flights to an NPI are currently possible day and night and calculates a similar figure for night availability during Blackpool Airport operating hours. A minor difference affecting both numbers arises from Harbour Energy recognising that, whilst aviation rules allow flying in up to 60 kn winds (the assumption used by the Applicant), take-off and landing at an offshore installation is only possible when an emergency rescue vessel could be deployed. This limits flying to when winds are below 45 knots and significant wave height less than 5.5 m (per Offshore Energy UK document: "OEUK Guidelines for the Management of Helideck Operations" Issue 7, April 2024) yielding a slightly higher percentage of no fly times.</p> <p>Although Harbour Energy's numbers differ fractionally (98% day availability, 97% night availability), the methodology is agreed, the source of the difference understood and the difference not considered to be material.</p>	
HE.AOMW.4	Vantage data analysis	<p>As described in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), Vantage Personnel On Board flight data for a typical NPI decommissioning project was reviewed. Noble Innovator jack-up performing decommissioning work at the Kate Field in the Central North Sea was utilised for this assessment. The flight data covered the five-month decommissioning campaign. The Vantage data confirmed the assumption that flights typically take place during daylight hours, with approximately one flight every two days. If these flights had occurred at the same time during the winter months, five flights out of 63 (8%) would have arrived at the rig at night, so would have to be rescheduled. Whilst the number of flights would be expected to be greater for an Irish Sea decommissioning operation due to the smaller helicopters being used, however, based on industry experience, the vast majority would still be expected to take place during daylight hours.</p>	<p>The Applicant has applied conclusions from analysis of a single decommissioning project, which, as it is from the Central North Sea, they acknowledge is not representative of an East Irish Sea decommissioning project. The statement "based on experience; the vast majority would still be expected to take place during daylight hours" is unsupported and speculative.</p> <p>Every decommissioning programme is different, both in its timing, scope and the extent of aviation support required. It is very rare for aircraft to be dedicated to a specific decommissioning project and timing of flights will depend upon other demands and constraints upon the aviation provider. Where aircraft are supporting operations on facilities restricted to daylight flying, flights to an NPI that can be conducted night or day are more likely to take place during night hours, leaving the aircraft available to support the other facilities through the day.</p>	Not agreed, but not material

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
HE.AOMW.5	Future operations	<p>The Millom West Platform is located 1.6 nm from the Morgan Array Area. This will prevent IMC approaches, resulting in a 4.3% average annual loss of access. A distance of 1.5 nm is a sufficient distance for a Day VMC approach, so the access will be an average of 94.4% of daylight conditions.</p> <p>The mitigation measures and conditions outlined in Volume 2, Chapter 11: Aviation and radar (APP-015) and the Mitigation and Monitoring schedule (APP-076) are appropriate and will result in minor adverse residual impacts, which are not significant in EIA terms and logistical in nature.</p> <p>The Applicant is aware that the decommissioning programme for Millom West may be completed before the installation of the wind turbine generators on the foundations, so there may not be a temporal overlap of activities. The Applicant seeks to remain engaged with Harbour Energy in order to understand the decommissioning timescales.</p>	<p>Harbour Energy calculates that 38% of currently available opportunities to fly to an NPI at Millom West would be lost as a result of the proximity of the Morgan Generation Assets.</p> <p>Due to avoiding impact on nesting sea birds, the decommissioning programme will be carried out in the winter. Harbour Energy calculate that, during winter, 58% of currently available times when a flight could be made to an NPI would be lost.</p> <p>The Applicant's statements ignore the loss of any night-time flights and the need to consider winter conditions.</p> <p>This would cause considerable disruption to operations and introduce additional costs and risks.</p> <p>Harbour Energy's detailed plans for the Millom West decommissioning programme are now better defined. Harbour Energy does not anticipate any critical need for helicopter flights to a heavy lift vessel (HLV) performing the removal of the Millom West platform nor to any of the subsea decommissioning support vessels (dive support vessel (DSV) and construction support vessel (CSV)) involved. HLV, DSV and CSVs are the only NPIs expected to be required for the remaining decommissioning of Millom West. Accordingly, though not for any of the reasons suggested by the Applicant, Harbour Energy does not anticipate any material adverse impact on the Millom West decommissioning programme arising from proximity of the Morgan Generation Assets.</p>	Not agreed, but not material

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1.2.5 Implications on aviation operations at Millom East due to the proximity of the Morgan Generation Assets

Table 1.5: Agreement Log between the parties on implications on aviation operations at Millom East due to the proximity of the Morgan Generation Assets.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
Implications of Morgan Generation Assets proximity on aviation operations at Millom East				
HE.AOME.1	Assessment methodology approach – 3 nm rules	<p>The CAA is considering a regulatory change for operations within 3 nm of a wind farm, increasing the Day VMC limits from the current cloud base of 600 ft to 700 ft, with an increase in visibility from the current 4,000 m to 5,000 m. Additionally, only Day VMC approaches and departures from a helideck would be permitted within 3 nm of a wind farm.</p> <p>The Applicant has used this as a worst case assumption in assessing the impact of helicopter access to adjacent helidecks.</p> <p>The Applicant understands that this regulatory change is not certain and, if progressed, could take several years.</p>	<p>New rules adopted by helicopter operators and expected to be introduced by the CAA would limit any flying within 3 nm of the nearest rotor tip to daylight and visual with additional requirements that visibility be ≥ 5 km and cloud base ≥ 700 ft.</p> <p>The change was considered and agreed at the August 2024 meeting of the CAA led Offshore Helicopter Safety Leadership Group (OHSLG). The OHSLG is tri-partite with the following membership:</p> <ul style="list-style-type: none"> Group Director Safety and Airspace CAA (supported by relevant CAA Heads of Department) The “accountable managers” of each of the helicopter operators [Three] senior oil and gas industry (client) representatives appointed by the Board of Oil and Gas UK The HSE Director of Oil & Gas UK A senior Trade Union Representative from each of BALPA, Unite and RMT A Step Change in Safety Leadership representative appointed by the Step Change in Safety Leadership Team A representative from Transport for Scotland A representative from The AAIB. 	Not agreed, but not material
HE.AOME.2	Adequacy of 2.07 nm separation from	As set out in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), the Applicant	The advice received by Harbour Energy from both its aviation technical advisors (AviateQ) and the helicopter operator currently providing services to Harbour Energy	Agreed

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
	Morgan Generation Assets	<p>maintains that 1.5 nm is sufficient to execute Day VMC landing and take-off.</p> <p>The Applicant has requested the parameters used by AviateQ to substantiate Harbour Energy's position that 2.07 nm is sufficient for Day VMC flights. The Applicant notes that the Millom East assets are located 2.07 nm from the Morgan Generation Assets and therefore accepts Harbour Energy's position in relation to the Millom East assets.</p>	installations in the East Irish Sea, is that 2.07 nm would be sufficient to conduct both a visual approach and landing and subsequent take-off whatever the wind direction. In accordance with the 3 nm rules referenced above, operations would however be limited to daylight and visual.	
HE.AOME.3	Calculation of current access	<p>As set out in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), when a drilling rig or diving support vessel is required to work on the wellheads, helicopter access might be required. Most drilling rigs and diving support vessels have helidecks approved for both day and night operations. For the period 2018 to 2022, access was available for 98.7% of daylight condition (Day VMC 94.4% (Table A. 2)) plus 4.3% average usable IMC (Table A.3).</p>	<p>Harbour Energy's assessment yields a similar figure for the percentage of daylight conditions during Blackpool Airport operating hours which were available for flying.</p> <p>Harbour Energy agrees with the Applicant that flights to an NPI are currently possible day and night and calculates a similar figure for night availability during Blackpool Airport operating hours. A minor difference affecting both numbers arises from Harbour Energy recognising that, whilst aviation rules allow flying in up to 60 kn winds (the assumption used by the Applicant), take-off and landing at an offshore installation is only possible when an emergency rescue vessel could be deployed. This limits flying to when winds are below 45 kn and significant wave height less than 5.5 m (per Offshore Energy UK document: "OEUK Guidelines for the Management of Helideck Operations" Issue 7, April 2024) yielding a slightly higher percentage of no fly times.</p> <p>Although Harbour Energy's numbers differ fractionally (98% day availability, 97% night availability), the methodology is agreed, the source of the difference understood and the difference not considered to be material.</p>	Agreed
HE.AOME.4	Vantage data analysis	<p>As described in Appendix A of Volume 4, Annex 11.1: Helicopter Access Report (APP-045), Vantage POB flight data for a typical NPI decommissioning project was reviewed. Noble Innovator jack-up performing decommissioning work at the Kate Field in the Central North Sea was utilised for this assessment. The flight data covered the five-month decommissioning campaign. The</p>	<p>The Applicant has applied conclusions from analysis of a single decommissioning project, which, as it is from the Central North Sea, they acknowledge is not representative of an East Irish Sea decommissioning project. The statement "based on experience; the vast majority would still be expected to take place during daylight hours" is unsupported and speculative.</p>	Not agreed, but not material

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
		Vantage data confirmed the assumption that flights typically take place during daylight hours, with approximately one flight every two days. If these flights had occurred at the same time during the winter months, five flights out of 63 (8%) would have arrived at the rig at night, so would have to be rescheduled. Whilst the number of flights would be expected to be greater for an Irish Sea decommissioning operation due to the smaller helicopters being used, however, based on experience, the vast majority would still be expected to take place during daylight hours.	<p>Every decommissioning programme is different, both in its timing, scope and the extent of aviation support required. It is very rare for aircraft to be dedicated to a specific decommissioning project and timing of flights will depend upon other demands and constraints upon the aviation provider. Where aircraft are supporting operations on facilities restricted to daylight flying, flights to an NPI that can be conducted night or day are more likely to take place during night hours, leaving the aircraft available to support the other facilities through the day.</p> <p>Harbour Energy's planning for Millom East decommissioning is at an early stage with many details yet to be determined. Recent work suggests however that, due to the remoteness of the East Irish Sea from other UK oil and gas areas, aviation support for decommissioning is more likely to be provided by a part-time dedicated aircraft than by aircraft supporting other operations in the area. Based on this, and not the Applicant's reasoning, Harbour Energy believes that flights to support the Millom East decommissioning programme will be able to be scheduled within daylight hours.</p>	
HE.AOME.5	Future operations	<p>Consultation with stakeholders, including helicopter operators, indicates that a distance of 1.5 nm is sufficient for a Day VMC approach and take-off. This would provide an average daytime access of 94.4% (see Table A.2), but no CAT night operations.</p> <p>The mitigation measures and conditions outlined in Volume 2, Chapter 11: Aviation and radar (APP-015) and the Mitigation and Monitoring schedule (APP-076) are appropriate and will result in minor adverse residual impacts, which are not significant in EIA terms and logistical in nature.</p> <p>The Applicant is aware that the decommissioning programme for Millom East is yet to be confirmed regarding any potential for the temporal overlap of activities. The Applicant seeks to remain engaged with</p>	<p>Harbour Energy calculates that 20% of currently available opportunities to fly to an NPI at Millom East would be lost as a result of the proximity to the Morgan Generation Assets.</p> <p>The Applicant's statements ignore the loss of any night-time flights and the need to consider winter conditions.</p> <p>Based on the observations made by Harbour Energy under HE.AOME.4 above, if flights are only conducted in daylight hours, an annual average of 10% of currently available daylight opportunities to fly to an NPI would be lost. Were the work conducted in winter, which is equally likely, 16% of currently available daylight opportunities to fly to an NPI would be lost.</p> <p>Due to the criticality of aviation support during well decommissioning, Harbour Energy considers that a loss of 16% of currently available flying opportunities would cause</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
		Harbour Energy in order to understand the decommissioning timescales.	considerable disruption, delaying the completion of the programme and resulting in significant additional costs.	

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1.2.7 Marine corridors

Table 1.6: Agreement Log between the parties on marine corridors.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
Marine corridors				
HE.MCO.1	Assessment of the effects from the Morgan Generation Assets alone – marine corridors	<p>The potential impact on vessel access to existing offshore energy assets is assessed in section 9.9.3 of Volume 2, Chapter 9: Other sea users (APP-027). It was concluded that as there is no other infrastructure associated with any other offshore energy project within the local other sea users study area, vessel access is not anticipated to be restricted to any existing offshore energy asset.</p> <p>During Section 42 consultation on the PEIR, Harbour Energy requested marine corridors to ensure safe passage and manoeuvring of vessels supporting Harbour Energy activities. The marine corridors requested (radius of 1 nm around the Millom West platform, a 1 nm corridor between the Millom West and DPPA platforms and 500 m each side of the Millom West and Millom East pipelines and subsea cables) are all located further than 1 nm from the Morgan Array Area Order Limits (the distance between the Morgan Generation Assets and the Millom West platform is 1.6 nm, while the Millom East wellheads are 2.1 nm away). The draft DCO and DMLs do not allow for the Applicant to conduct works, including siting of temporary navigational aids or markers, outside of the Order Limits. As confirmed, the Order Limits to not overlap with the marine corridors requested by Harbour Energy. Therefore, the Applicant considers that protective provisions or a Co-operation and Co-existence Agreement are not appropriate as they would govern an activity the Applicant will not have consent to undertake.</p>	<p>The Applicant's draft DCO contains no protective provisions for the protection of Harbour Energy. As set out in Harbour Energy's response to the PEIR, the Millom West platform and Millom East subsea wellheads will require marine access corridors free from temporary or permanent surface infrastructure (except as may from time to time be approved by the Millom Operator) as follows:</p> <ol style="list-style-type: none"> 1. a radius of 1.8 km (1 nm) around the Millom West platform; 2. a 1.8 km (1 nm) corridor between the Millom West and DPPA platforms; and 3. 500 m each side of the Millom West and Millom East pipelines and subsea cables. <p>The marine corridors listed above are to ensure the safe passage and manoeuvring of vessels supporting both the operation and future decommissioning activities of the platform and associated subsea facilities.</p> <p>Harbour Energy expects these marine corridors to be included in protective provisions, or that a condition of the Application being granted should be that an agreement (a Co-operation and Co-existence Agreement) is in place that addresses these interfaces between the parties.</p>	Ongoing point of discussion

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1.2.8 Mutually exclusive/simultaneous operations

Table 1.7: Agreement Log between the parties on simultaneous operations.

Reference Number	Discussion point	Applicant's Position	Harbour Energy's Position	Status
Mutually exclusive operations				
HE.SO.1	Mutually exclusive operations/ simultaneous operations	<p>The measures adopted as part of the Morgan Generation Assets to reduce the potential for impacts on other sea users, as outlined in Table 9.13 of Volume 2, Chapter 9: Other Sea Users (APP-027), are appropriate and will ensure significant effects are avoided.</p> <p>In particular, the measure <i>“Continued communication with other offshore energy operators to promote and maximise cooperation between parties and minimise both spatial and temporal interactions between conflicting activities”</i> is considered a key measure and in line with industry good practice.</p> <p>The Applicant suggests that the parties agree to meet regularly to discuss their respective activity programmes in order to minimise disruption to either party's operations and to maximise coexistence. Where necessary, this will include establishing simultaneous operations procedures in accordance with recognised industry good practice such as the International Marine Contractors Association Guidance on Simultaneous Operations (IMCA, 2023).</p> <p>Further, the Applicant will set up a Marine Coordination Centre to coordinate all marine activities and the process for communication with other operators in the East Irish Sea will be established. The Applicant considers this to be a logistical matter which can be coordinated between the parties post-consent using industry standard practices.</p> <p>The Applicant also notes that the Marine Navigation Engagement Forum, which Harbour Energy is a member of, will continue post-consent and may provide a suitable management interface for these matters.</p>	<p>Harbour Energy's Relevant Representation [RR-012] states that detrimental impacts may arise affecting mutually exclusive simultaneous operations such as piling and diving operations (reference Diving Medical Advisory Committee: DMAC 12 Safe Diving Distance from Seismic Surveying Operations Rev. 2.1 – June 2020).</p> <p>Harbour Energy believes that a condition of the Application being granted should be that an agreement (a Co-operation and Co-existence Agreement) is in place between Harbour Energy and the Applicant setting out the mechanisms for coordinating such mutually exclusive activities.</p>	Ongoing point of discussion