

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and Moir Vannin Offshore Wind Farm Limited

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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
AfL	Agreement for Lease
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IPs	Interested Parties
MCA	Maritime Coastguard Agency
MNEF	Marine Navigation Engagement Forum
MVOWFL	Moor Vannin Offshore Wind Farm Limited
NPS	National Policy Statement
NRA	Navigational Risk Assessment
NSIP	Nationally Significant Infrastructure Project
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground

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Units

Unit	Description
km	Kilometres
nm	Nautical Mile

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1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND MOOIR VANNIN OFFSHORE WIND FARM LIMITED

1.1 Introduction

1.1.1 Overview

1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as 'the Applicant') and Mooir Vannin Offshore Wind Farm Limited (hereafter referred to as 'MVOWFL'). The SoCG sets out the areas of common ground 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').

1.1.1.2 The need for a SoCG between the Applicant and MVOWFL is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 August 2024 (PD-001) and in ExQ2 (GEN 2.8, PD-009).

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG facilitated further discussion between the parties and is now finalised and signed at Deadline 6.

1.1.2 Morgan Generation Assets elements relevant to MVOWFL

1.1.2.1 MVOWFL is an offshore wind farm developer with a proposed project (Mooir Vannin) in the east Irish Sea (sited wholly within Isle of Man territorial waters) who made a Relevant Representation (RR-021) in relation to the Morgan Generation Assets. The elements of the Morgan Generation Assets which may affect the interests of the MVOWFL are detailed in Schedule 1 (Authorised Development), Part 1 (Authorised Development) of the Draft DCO (REP4-013).

1.1.2.2 This SoCG covers the following topics of relevance to MVOWFL:

- Availability of information relating to the Mooir Vannin project and timing of the Mooir Vannin project submission to IoM Government;
- Matters relating to the navigational safety of the 4.1nm gap between the two projects;
- Wake loss effects on Mooir Vannin as a result of the Morgan Generation Assets.

1.1.3 Overview of Morgan Generation Assets

1.1.3.1 The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The Morgan Generation Assets will include offshore infrastructure and consists of:

- Morgan Array Area: this is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables and interconnector cables will be located.

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1.1.4 Approach to SoCG

1.1.4.1 In accordance with discussions between the parties, this SoCG is focused on the remaining issues raised by MVOWFL. This SoCG presents the agreement logs and the respective positions reached on 27 February 2025 (Deadline 6).

1.2 Agreement log

1.2.1 Overview

1.2.1.1 This 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.

1.2.1.2 The following section sets out the level of agreement between the parties.

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1.2.2 Agreement log between MVOWFL and Morgan Generation Assets

Table 1.2: Agreement Log between the parties.

Reference Number	Discussion point	Applicant's Position	MVOWFL's Position	Status
Availability of information relating to the Mooir Vannin project and timing of information in the public domain				
MV.OWF.1	Consideration of the Mooir Vannin project	<p>The Applicant was aware of the Agreement for Lease (AfL) area in Isle of Man waters at the time it was undertaking its Preliminary Environmental Impact Report (PEIR), but there was not a scoping report for the Isle of Man project in the public domain at that time.</p> <p>During the preparation of the Environmental Statement for application, and whilst undertaking detailed Navigation Risk Assessment work in Q3 2023, the MVOWFL scoping report was published and the Applicant, following the Planning Inspectorate's guidance, considered the Mooir Vannin project as a Tier 2 project in the cumulative effects assessment. The Applicant prepared a CRNRA Addendum to capture Mooir Vannin's scoping boundary.</p> <p>To date there has not been any preliminary or final impact assessment material produced by Mooir Vannin made available in the public domain, upon which the Applicant can undertake a quantified cumulative effects assessment of Mooir Vannin.</p> <p>As soon as the final Mooir Vannin Environmental Statement is available in the public domain, the Applicant will update the Cumulative Effects Assessment accordingly.</p>	<p>The Mooir Vannin Offshore Wind Farm AfL was signed with the Isle of Man Government in November 2015.</p> <p>Engagement between Mooir Vannin and the Applicant began in October 2022 prior to publishing of the Applicant's PEIR, where the Mooir Vannin team provided the project timeline for development and AfL shapefile.</p> <p>Preliminary Environmental Information, including an updated Project Description, was published on the Mooir Vannin website and notified to stakeholders via email in July 2024. Mooir Vannin re-iterate, as stated in REP3-041 and REP5-077, that the Environmental Impact Assessment for the Mooir Vannin Offshore Wind Farm is now largely complete and the results of the impact assessments can be made available to the Applicant to ensure a complete assessment can be undertaken on cumulative effects.</p>	Ongoing point of discussion
MV.OWF.2	Mooir Vannin boundary for application	<p>The Applicant attended the MVOWFL Hazard Workshop on 12 December 2024, where MVOWFL shared a refined project boundary with its shipping and navigation consultees. The scoping boundary was amended by MVOWFL following consultation feedback during Q3/Q4 2024 and the Applicant</p>	<p>The refined order limits presented by Mooir Vannin in the Hazard Workshop and shared with the Applicant, December 2024, are those to be included within the Mooir Vannin Application.</p> <p>This order limits change increases the gap between the two projects from 2.5 nm to 4.1 nm.</p>	Agreed

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Reference Number	Discussion point	Applicant's Position	MVOWFL's Position	Status
		understands that the new boundary will be submitted with the forthcoming consent application. The Scoping Boundary has been superseded by this new boundary.		
MV.OWF.3	Moor Vannin application submission	<p>The Applicant understands that MVOWFL are aiming to submit their application to the IoM Government on 12 March 2025, two days after the close of the Morgan Generation Assets Examination. Whilst the Applicant attended the MVOWFL Hazard Workshop, it is unlikely that further materials (such as the Navigation Risk Assessment) will be provided for review prior to submission of that application.</p> <p>The Applicant understands MVOWFL's consenting timeframes are as per MVOWFL's response to ExQ1 CE1.5 (ii) in REP3-041, noting the uncertainty:</p> <ul style="list-style-type: none"> • MIC Application - anticipated March 2025 • Examination - anticipated July to December 2025 • MIC Consent Award - anticipated June 2026 • Construction Start - anticipated Q2 2030. 	<p>In REP5-077 Moor Vannin confirmed the relevant dates are:</p> <ul style="list-style-type: none"> • MIC Application - anticipated March 2025 • Examination - anticipated June to December 2025 • MIC Consent Award - anticipated April 2026 • Construction Start - anticipated Q2 2030 <p>Moor Vannin re-iterate, as stated in REP3-041 and REP5-077, that the Environmental Impact Assessment for the Moor Vannin Offshore Wind Farm is now largely complete and the results of the impact assessments can be made available to the Applicant to ensure a complete assessment can be undertaken on cumulative effects.</p>	Ongoing point of discussion
Navigational safety (distance between the projects)				
MV.SN.1a	NRA Assessment Conclusions, including navigational safety in the gap between the two projects	<p>a) The Morgan Generation Assets impacts on navigational safety are Tolerable and ALARP and cumulative impacts associated with the Morgan Generation Assets, Mona and Morecambe on navigational safety are Tolerable and ALARP.</p> <p>Cumulative impacts associated with passage between the Morgan Array Area and Moor Vannin's Scoping boundary (where the separation distance was 2.61 nm between the two projects) were assessed to be High Risk – Unacceptable within the Applicant's assessment (APP-060). The gap was presented in the CRNRA as a corridor of 2.5 nm taking into account the orientation of the shipping routes rather than minimum gap.</p>	<p>a) With consideration of guidance, traffic volumes and consultation feedback, Moor Vannin Offshore Wind Farm Limited agrees that the 2.5nm width was inadequate and presented an unacceptable (not ALARP) risk significance.</p> <p>Including the site refinements offered by MVOWFL since Scoping the impacts presented by the Applicant upon navigational safety may have changed to those presented at the point of DCO Application.</p> <p>Moor Vannin Offshore Wind Farm Limited agree that the 4.1nm gap between the Morgan Array Area and Moor Vannin Array Area is compliant</p>	a) Agreed

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Reference Number	Discussion point	Applicant's Position	MVOWFL's Position	Status
		<p>Since submission of the NRA, MVOWFL refined the scoping boundary to increase the distance between the projects to 4.1 nm.</p> <p>The Applicant has undertaken further technical work (submitted at Deadline 6) which demonstrates that the risk to navigational safety is based on the current gap of 4.1 nm is Tolerable and ALARP, which the MCA as the appropriate safety adviser for the NPS is content with, and the Applicant has met the relevant guidance and policy requirements.</p> <p>The Applicant understands the assessment conclusion aligns with that of Moir Vannin.</p>	with the Shipping Route Template (MGN 654 Annex 2) and PIANC guidance (full round turn).	
MV.SN.1b		b) There is no further mitigation required by either party.	b) Recent representations by the Isle of Man Steam Packet Company indicate a need for increased sea room for navigational safety. Should the distance between the Applicant's project and Moir Vannin be required to increase, then this additional distance should be provided by the Applicant as per REP5-075 Moir Vannin and Morgan Gap Position Paper and MVOWFL's Closing Statement submitted at Deadline 6.	<p>b) Ongoing point of discussion</p> <p>Final position 24/02/25: subject to the final decision of the Secretary of State.</p>
Wake Loss Effects				
MV.WL.1	Wake loss effect on Moir Vannin relating to the proximity of the Morgan wind farm	<p>The Applicant's position on wake loss is that it is not covered by the NPS, it is not a planning matter for this application and is therefore not a material consideration for the examining authority.</p> <p>The Applicant would also note that the Moir Vannin application has not yet been submitted into any planning system.</p>	Moir Vannin Offshore Wind Farm Limited considers that the Morgan Generation Assets will have an impact on the energy yield of the Moir Vannin wind farm, which is an important transboundary issue, and a wake loss assessment considering the impacts of Morgan wind farm on Moir Vannin should be undertaken by the Applicant and impacts appropriately mitigated or compensated Moir Vannin notes that the Applicant was aware of the Moir Vannin Agreement for Lease (AfL) at the time it submitted its DCO application.	Not agreed