

# MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

## Statement of Common Ground between Morgan Offshore Wind Limited and Stena Line

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Image of an offshore wind farm

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

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### Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
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 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
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IMO	International Maritime Organization
MGN	Marine Guidance Notes
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
NRA	Navigational Risk Assessment
ORE	Offshore Renewable Energy
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
RoRo	Roll on Roll off
SoCG	Statement of Common Ground
TSS	Traffic Separation Schemes
UNCLOS	United Nations Convention on the Law of the Sea
VTMP	Vessel Traffic Management Plan

## MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

# 1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND STENA LINE

## 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 Stena Line Limited ("Stena Line"), hereafter referred together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed 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 Stena Line is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 August 2024 (PD-001).

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 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).

### 1.1.2 Morgan Generation Assets elements under Stena Line's remit

1.1.2.1 Stena Line is one of the world's largest ferry operators with over 26,000 yearly sailings on routes across Scandinavia and the Baltic, Irish and North Seas. Stena Line operates six passenger and freight Roll on Roll off (RoRo) vessels in the Irish Sea on three separate routes. Stena Line's Liverpool to Belfast and Heysham to Belfast routes are the key routes affected by the Morgan Generation Assets. The elements of the Morgan Generation Assets which may affect the interests of Stena Line are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft Development Consent Order (AS-003).

1.1.2.2 This SoCG covers the following topics of relevance to Stena Line:

Assessment and proposed mitigation of effects on:

- Shipping and scheduled ferry services.
- Navigational safety.
- Cumulative effects.

### 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

This SoCG has been developed during the pre-Examination phase and has been progressed during the Examination phase of the Morgan Generation Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by Stena Line within its response to Scoping, Section 42 consultation and as raised through the Marine Navigation Engagement Forum (MNEF) that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by Stena Line during the post-application phase (i.e. relevant representations and pre-Examination meetings).
- 1.1.4.2

The structure of this SoCG is as follows:

  - Section 1.1: Introduction
  - Section 1.2: Summary of SoCG
  - Section 1.3: Summary of consultation
  - Section 1.4: Agreement Log.

1.2 Summary of SoCG

1.2.1 Overview

- 1.2.1.1

This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phases of the Morgan Generation Assets. The agreement logs present the position reached on 27 February 2025 (Deadline 6).

1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed

- 1.2.2.1

Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.

Topic	Agreement status
Shipping and navigation (EIA)	Agreed (consultation, baseline environment, assessment methodology, project envelope)
	Position agreed with outstanding concerns (consultation, consideration of Mooir Vannin)
	Ongoing points of discussion (assessment methodology in consideration of Mooir Vannin)
Shipping and navigation (NRA – Morgan Alone)	Agreed (assessment of hazards, approach to VTMP)
	Position agreed with outstanding concerns (effects on strategic routes, radar ETVs)
	Ongoing points of discussion (residual effect mitigation)
	Not agreed (TSS, indemnity)
Shipping and navigation (CRNRA – Morgan cumulatively excluding Mooir Vannin)	Agreed (assessment of hazards, approach to VTMP)
	Position agreed with outstanding concerns (consultation, raised baseline risk, effects on strategic routes, ETVs, radar)

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Topic	Agreement status
Shipping and navigation (CRNRA – Morgan cumulatively including Moir Vannin)	Ongoing points of discussion (residual effect mitigation)
	Not agreed (TSS, indemnity)
	Agreed (assessment of hazards, approach to VTMP)
	Position agreed with outstanding concerns (consultation, assessment methodology, raised baseline risk, allision and collision risk hazards, effects on strategic routes, consideration of Moir Vannin, ETVs, radar, residual effect mitigation)
	Not agreed (TSS, indemnity)



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### 1.3 Summary of consultation

**Table 1.2 below provides a summary of the consultation undertaken by the Applicant with Stena Line during the pre-application phase of the Morgan Generation Assets.**

1.3.1.1 Table 1.3 below provides a summary of the consultation undertaken by the Applicant with Stena Line during the post-application phase of the Morgan Generation Assets.

**Table 1.2: Summary of pre-application consultation with Stena Line.**

Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
<b>Marine Navigation Engagement Forum (MNEF)</b>				
10/11/2021	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>• Project introduction and development process</li> <li>• Project timeline</li> <li>• Project Design (Scoping) and Refinement</li> <li>• Community and Maritime Engagement</li> <li>• MNEF purpose and ToR</li> <li>• Site selection in relation to shipping and navigation constraints</li> <li>• Impacts of COVID-19 on data collection</li> </ul>
06/05/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>• Project update - review of key themes from previous meeting</li> <li>• Data Collection and NRA</li> <li>• Impacts to ferry operators</li> <li>• Relation of impacts on ferry routes with regulation and guidance</li> <li>• Sensitivity of ferry operator schedules.</li> <li>• Extent of incident data</li> <li>• Safety of navigating in gaps</li> <li>• Consequences of allisions with wind turbines</li> </ul>
10/10/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>• Project update</li> <li>• Application process</li> <li>• Cumulative impacts of multiple projects on ferry operations (responding to stakeholder feedback)</li> <li>• How the cumulative impacts will be assessed or examined</li> <li>• Introduction to Morgan/Morecambe combined transmission project.</li> </ul>



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Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
18/01/2023	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Project update</li> <li>Cumulative assessment approach and progress</li> <li>Update on assessment work completed since MNEF 3 – HAZID workshop, PEIR deliverables Morgan NRA, cumulative regional NRA and bridge simulations</li> <li>PEIR process and statutory consultation</li> <li>Project revisions and commitments</li> <li>Planned activities and next steps.</li> </ul>
21/09/2023	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Project update</li> <li>Cumulative assessment approach and progress</li> <li>PEIR assessment and key findings</li> <li>Project revisions</li> <li>Update on assessment work undertaken since MNEF 4</li> <li>DCO application process</li> <li>Planned activities and next steps.</li> </ul>
08/02/2024	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Project update</li> <li>Update on assessment work undertaken since MNEF 5 and consideration of Moir Vannin Offshore Wind Farm)</li> <li>DCO application process</li> <li>Planned activities and next steps.</li> <li>Cumulative assessment approach and progress</li> </ul>

**Shipping and navigation consultation**

14/02/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Project update</li> <li>Key shipping and navigation impacts</li> <li>Review of proposed approach to assessment.</li> </ul>
14/04/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>To provide the evidential basis behind the current operations and constraints of ferry operations in order to inform the NRA and EIA.</li> </ul>
01/06/2024	Letter	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Letter to provide and update on the project</li> </ul>
11/08/2022-12/08/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Bridge navigation simulation preparations</li> <li>Meeting for familiarisation of navigation simulation procedure for Stena Line by HR Wallingford.</li> </ul>
23/08/2022-25/08/2022	Meeting	Sten Line	Non-statutory	<ul style="list-style-type: none"> <li>PEIR stage bridge navigation simulations.</li> </ul>

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Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
03/10/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Online webinar to run through the approach and process for the Hazard workshop with all S&amp;N stakeholder attendees.</li> </ul>
10/10/2022-11/10/2022	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Morgan Generation Assets Hazard Workshop.</li> </ul>
23/05/2023-25/05/2023	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Environmental Statement stage bridge navigation simulations.</li> </ul>
13/12/2023	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>To provide an update following the Hazard workshops</li> </ul>
01/03/2024	Meeting	Stena Line	Non-statutory	<ul style="list-style-type: none"> <li>Discussion on residual concerns</li> </ul>

**Table 1.3: Summary of post-application consultation with Stena Line.**

Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
04/07/2024	Meeting	Stena Line	Non-statutory	Discussion on residual concerns.
02/09/2024	Meeting	Stena Line	Non-statutory	Initial discussion on SoCG content and scope.
20/09/2024	Meeting	Stena Line	Non-statutory	Review of SoCG for submission at Deadline 1.
01/10/2024	Meeting	Stena Line	Non-statutory	Review of SoCG for submission at Deadline 1.
18/10/2024	Meeting	Stena Line	Non-statutory	Discussion on residual effects
24/10/2024	Meeting	Stena Line	Non-statutory	Review and update of SoCG for Deadline 3.
20-21/01/2025	Navigation simulations and hazard workshop	Stena Line	Non-statutory	Morgan – Moor Vannin navigation simulations and hazard workshop
27/02/2025	Email correspondence	Stena Line	Non-statutory	Review and update of SoCG for Deadline 6.

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1.4 Agreement log

1.4.1 Overview

1.4.1.1 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 1.4 below.

Table 1.4: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Position Agreed but with concerns outstanding	Position agreed but with concerns outstanding.
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.

1.4.1.2 The following sections set out the level of agreement between the parties for each relevant component of the application.

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### 1.4.2 Shipping and navigation

1.4.2.1 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application in relation to shipping and navigation.

**Table 1.5: Agreement Log between the parties on shipping and navigation.**

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
<b>Environmental Impact Assessment (EIA)</b>				
STENA.SN.1	Consultation	The Applicant has undertaken adequate consultation with Stena Line on potential impacts on shipping and navigation.	Agreed in meeting 12/09/24. Engagements carried out as per Table 1.2 above.	Agreed
STENA.SN.2(a)	Consultation (excluding consideration of Moir Vannin)	The EIA has had due regard to matters raised by Stena Line through statutory and non-statutory consultation on potential impacts on shipping and navigation.	Agreed in meeting 12/09/24. We agree that there has been considerable focus on the NRA for Morgan, Mona and Morecambe projects. The NRA post reduction of the Red line boundary has returned risk levels as ALARP however we must still identify that the risk level post development in comparison to the current level is appreciably raised and would, therefore, caution the relevance of the ALARP concept in the context of Stena Line's concerns. Stena Line continues to explore with the Applicant the commercial aspects of development on Stena Lines business.	Position Agreed but with concerns outstanding
STENA.SN.2(b)	Consultation (including consideration of Moir Vannin)	The EIA has had due regard to matters raised by Stena Line through statutory and non-statutory consultation on potential impacts on shipping and navigation. The Applicant contends that, whilst an agreement for lease area was awarded in 2015, there was insufficient information available on Moir Vannin until information on the Scoping Boundary was provided to Morgan Generation Assets on 01	Stena Line had requested that the Moir Vannin project be considered by the same NRA process as Morgan, Mona and Morecambe viewing it as an adjacent transboundary development. Stena Line raised in Section 42 consultation that the Applicant was aware that the Moir Vannin project was in progress. Discussed in meeting 01/11/24 - On the basis that the Applicant agrees with the position that there is	Position Agreed but with concerns outstanding

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>September 2023. The Stena Line navigation simulations were completed in May 2023 and therefore before this information was known, and therefore could not be fully assessed.</p> <p>The Applicant notes that Stena Line were present at the second hazard workshop in September 2023 where a cumulative assessment with Mooir Vannin was discussed. Consensus was reached with attendees that there was insufficient space between Morgan Array Area and Mooir Vannin. As such it was not necessary to undertake further navigation simulations to confirm this. No further changes since September 2023 have been provided that would necessitate revisiting this conclusion.</p>	<p>insufficient space between Morgan Array Area and Mooir Vannin, Stena Line can accept that there is a position of agreement on this point however we would appreciate a clarification as to how both parties would propose that this is addressed between the two applicants (Morgan and Mooir Vannin).</p>	
STENA.SN.3	Baseline environment	<p>The baseline for shipping and navigation has been appropriately characterised and appropriate data has been used to inform assessment.</p>	<p>Agreed in meeting 12/09/24.</p> <p>Stena Line accepts the data as presented by the Applicant for the concentration and type of marine traffic as currently using the area.</p>	Agreed
STENA.SN.4	Baseline environment	<p>The potential effects identified within Volume 2, Chapter 7: Shipping and navigation (APP-025) represent a comprehensive list of potential effects on shipping and navigation from the Morgan Generation Assets.</p>	Agreed	Agreed
STENA.SN.5(a)	Assessment methodology (excluding consideration of Mooir Vannin)	<p>The assessment methodology for shipping and navigation is appropriate (including interpretation of impact and levels of significance).</p>	Agreed in meeting 12/09/24.	Agreed
STENA.SN.5(b)	Assessment methodology (including consideration of Mooir Vannin)	<p>The assessment methodology for shipping and navigation is appropriate (including interpretation of impact and levels of significance).</p> <p>The Applicant contends that, whilst an agreement for lease area was awarded in 2015, there was insufficient information available on Mooir Vannin until information on the Scoping Boundary was provided to Morgan Generation Assets on 01 September 2023. The Stena Line navigation</p>	<p>Agreed with the exception that the NRA process for Mooir Vannin was carried out without representation of Stena Line.</p> <p>Discussed in meeting 01/11/24</p> <p>As with STENA.SN.2(b)</p> <p>On the basis that the applicant agrees with the position that there is insufficient space between Morgan Array Area and Mooir Vannin, Stena Line</p>	Position Agreed but with concerns outstanding

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>simulations were completed in May 2023 and therefore before this information was known, and therefore could not be fully assessed.</p> <p>Navigation simulations were conducted, that included the Mooir Vannin Offshore Wind Farm Scoping Boundary, with IoMSPC masters. The Applicant believes that as experienced masters who would most frequently transit this route, their views on the safety of this route can be representative to other operators.</p> <p>The Applicant notes that Stena Line were present at the second hazard workshop in September 2023 where a cumulative assessment with Mooir Vannin was discussed. Consensus was reached with attendees that there was insufficient space between Morgan Array Area and Mooir Vannin. As such it was not necessary to undertake further navigation simulations to confirm this. No further changes since September 2023 have been provided that would necessitate revisiting this conclusion.</p>	can accept that there is a position of agreement on this point however we would appreciate a clarification as to how both parties would propose that this is addressed between the two applicants	
STENA.SN.6	Assessment methodology	The navigation simulations were conducted in a fair and reasonable manner, and are appropriate for informing Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060).	Agreed in meeting 12/09/24.	Agreed
STENA.SN.7(a)	Assessment methodology (excluding consideration of Mooir Vannin)	The Hazard Workshops were undertaken allowing adequate stakeholder input into the risk assessment and are reflected within the NRA conclusions set out in section 1.11 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060).	Agreed in meeting 12/09/24.	Agreed
STENA.SN.7(b)	Assessment methodology (including consideration of Mooir Vannin)	The Hazard Workshops were undertaken allowing adequate stakeholder input into the risk assessment and are reflected within the NRA conclusions set out in section 1.11 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060).	<p>Accepted, with the exception that the NRA process for Mooir Vannin was carried out without representation of Stena Line.</p> <p>Discussed in meeting 01/11/24</p> <p>As with STENA.SN.2(b)</p>	Position Agreed but with concerns outstanding

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>The Applicant contends that, whilst an agreement for lease area was awarded in 2015, there was insufficient information available on Mooir Vannin until information on the Scoping boundary was provided to Morgan Offshore Wind Limited on 01 September 2023. The Stena Line navigation simulations were completed in May 2023 and therefore before this information was known, and therefore could not be fully assessed.</p> <p>Navigation simulations were conducted, that included the Mooir Vannin Offshore Wind Farm Scoping boundary, with IoMSPC masters. The Applicant believes that as experienced masters who would most frequently transit this route, their views on the safety of this route can be representative to other operators.</p> <p>The Applicant notes that Stena Line were present at the second hazard workshop in September 2023 where a cumulative assessment with Mooir Vannin was discussed. <u>Consensus was reached with attendees that there was insufficient space between the Morgan Array Area and Mooir Vannin.</u> As such it was not necessary to undertake further navigation simulations to confirm this. No further changes since September 2023 have been provided that would necessitate revisiting this conclusion.</p> <p>See STENA.SN.24 onwards for Mooir Vannin – Morgan gap updates/navigation simulations.</p>	<p>On the basis that the Applicant agrees with the position that there is insufficient space between Morgan Array Area and Mooir Vannin, Stena Line can accept that there is a position of agreement on this point however we would appreciate a clarification as to how both parties would propose that this is addressed between the two applicants (Morgan and Mooir Vannin).</p> <p>Stena Line would highlight that there were outstanding concerns raised by Stena Line and the IOM Steam Packet Company, after the navigation simulations which were conducted in respect of the scoring in the Simulations of 20th &amp; 21st Jan 2025 at HR Wallingford.</p> <p>Stena Line would also flag that the views of Masters from other operators 'on the safety of this route' cannot be taken as representative of Stena Line's views as the Applicant seeks to suggest, given that they were made by Masters of another commercial entity.</p>	
STENA.SN.8	Assessment methodology	Relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	Accepted, on the basis that the Applicant agreed at the time with the position that there is insufficient space between Morgan Array Area and Mooir Vannin.	Agreed
STENA.SN.9	Project design envelope	Volume 2, Chapter 7: Shipping and navigation (APP-025) has identified, described and assessed the maximum design scenario for the EIA.	Agreed in version issued by Stena Line 15/09/2024.	Agreed



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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
<b>Navigational Risk Assessment (NRA)</b>				
STENA.SN.10	Assessment of the effects from the Morgan Generation Assets alone	Hazards and impacts identified as relevant to the Morgan Generation Assets have been assessed within the shipping and navigation assessment.	Agreed in meeting 12/09/24.	Agreed
STENA.SN.11		Hazards have been assessed as either Broadly Acceptable or Tolerable (if As Low As Reasonably Practicable (ALARP)) and there are no unacceptable hazards.	Agreed in meeting 12/09/24. We agree that the consensus at the Haz ID Workshops returned all hazards as ALARP.	Agreed
STENA.SN.12		<p>With regards to navigational safety, the mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) would be disproportionate and therefore all medium risk hazards can be considered ALARP without the need for additional risk control measures.</p> <p>1) Following discussion with Stena Line on 01/10/2024, Stena Line confirmed they understand the intention for the VTMP therefore Item 1 in Stena Line's position is agreed.</p> <p>The Outline Vessel Traffic Management Plan (APP-071) has been updated at Deadline 2 and 5 to include further details around the engagement on plans through the Marine Navigation Engagement Forum.</p> <p>Vessel traffic monitoring required for MCA (MGN654) is set out in the In Principle Monitoring Plan (APP-066) as part of the Navigation Monitoring Strategy.</p> <p>2) <b>Final position:</b> as per MCA response to ExQ2 (REP5-069) the Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. While the assessment of towing</p>	<p>1. We need to know how the Vessel Traffic Management Plan (VTMP) will be monitored and co-ordinated from a practical perspective (Agreed).</p> <p>2. Emergency Tow Vessels (ETV's) from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk and because the time available to the Master of a disabled vessel is limited due to the proximity of adjacent turbines an ETV to cover the area would be very beneficial. Stena Line notes that the Applicant's final position that the Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. In this respect it is reiterated that upon such consideration by the MCA an ETV to cover the area would be very beneficial. (Concerns Outstanding)</p> <p>3. Stena notes that the Applicant's final position is that the Applicant will not indemnify shipping operators from losses or damages incurred through the emergency use of anchors, brought about by Force Majeure occurrences. Stena therefore continues to have serious concerns in respect of the effects upon its operations. (Not agreed)</p>	<p>1) <b>Agreed</b></p> <p>2) <b>Concerns outstanding</b></p> <p>3) <b>Not agreed</b></p>

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>capability would be secured via the Vessel Traffic Management Plan, details of towing capability would be required to be contained within the ERCoP, or an update to the ERCoP.</p> <p>3) <b>Final position:</b> The Applicant will not indemnify shipping operators from losses or damage incurred through emergency use of anchors during force majeure situations.</p>		
STENA.SN.13		The Morgan Generation Assets would not interfere with sea lanes (Traffic Separation Schemes (TSS)) as defined by the NPS.	<p>We disagree with the position that only IMO recognised Traffic Separation Schemes constitute Sea lanes.</p> <p>UNCLOS refers to both separately and furthermore states in Article 60.7:</p> <p>“Artificial islands, installations and structures and the safety zones around them may not be established where interference may be caused to the use of recognized sea lanes essential to international navigation.”</p>	Not agreed
STENA.SN.14		<p>All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) would not be significant in EIA terms with the proposed mitigation measures in place.</p> <p>With regards to the impacts on <u>radar</u>, the Applicant refers to section 1.8.12 of the NRA (APP-060) which notes that spurious effects may be experienced, as detailed in the primary industry research. The Applicant notes, as recognised in this research and MGN 372 that such effects can be mitigated for appropriate passing distances. The Applicant also notes that Stena Line vessels are familiar with operating past offshore wind farms, including between two (Ormonde and West of Duddon Sands). When passing the centre of the route between Walney offshore wind farms and the Morgan Array area, 2 nm offset is maintained from the array boundaries which is in excess of the 1.5</p>	<p>While the position was made by the Applicant during the Simulation exercises that Marine Radar is not significantly affected by the proximity of wind turbines, the National Academies of Sciences, Engineering, and Medicine, 2022 paper Wind Turbine Generator Impacts to Marine Vessel Radar gives us cause for concern that such interference is not fully evaluated in particular when passing between two ORE projects.</p> <p>Discussed in meeting 01/11/24 - The Applicants additional clarifying points are noted. We continue to believe, however, that there remains a continuing element of uncertainty as to the level of interference and the risk that poses, not just to Stena Line vessels but all vessels dependent on radar monitoring.</p>	Position Agreed but with concerns outstanding

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>nm at which these effects are experienced as per MGN 372 Amendment 1 Section 2.9.2.</p> <p>The Applicant also notes that the National Academies study referred to by Stena Line concludes that <i>"larger spacing between turbines will lead to less electromagnetic interaction between turbines. Consequently, it is expected that spurious echoes due to multiple scattering between turbines will lessen as turbine spacing increases"</i>. As such, the 1,400 m spacing between WTGs in the Morgan Array Area, will likely result in having lesser effects than those currently experienced with operational wind farms which Stena Line are successfully managing.</p> <p><b>Final position:</b> the Applicant will discuss with the MCA during the post consent/pre-construction stage the need for providing in-field, marine band VHF radio communications aerial(s) that can cover the entire wind farm site and its surrounding area, as per MGN654 Annex 5, section 6.1.</p>	<p>The Swedish government has recently rejected applications for 13 offshore wind farm applications in Baltic Sea citing their military's concerns with regards to the possible effect on radar.</p> <p>While the report does not specify the areas of the radio spectrum effected it would be reassuring to understand if the Marine bands are included ie 3.02–3.1 GHz (S band) or 3.1–9.45 GHz (S and X band).</p> <p>Stena notes that the Applicant's final position that the Applicant will discuss the need for providing in-field, marine band VHF radio communications aerial(s) that can cover the entire wind farm site and its surrounding area with the MCA post consent/pre-construction stage. The Applicant's position means that Stena Line will face operational uncertainty even after the examination has closed which is unacceptable.</p>	
STENA.SN.15		The Morgan Generation Assets could have potential significant effects on strategic ferry services due to adverse weather routing for Stena Line.	<p>Agreed in meeting 12/09/24.</p> <p>We agree that it will have effects on the lifeline services of ourselves and possibly other operators.</p>	Position Agreed but with concerns outstanding
STENA.SN.16	Mitigation (Morgan Generation Assets alone)	<p>With regards to adverse weather routing, the parties are engaging on the nature of the solution required to address the residual moderate adverse effects.</p> <p><b>Final position:</b> The Applicant will continue to engage on the terms of a commercial agreement and, should this be agreed, will report this to the Secretary of State. The Applicant does not consider than any protective provisions are necessary or justified and, even if a commercial agreement is not reached, any residual impact is considerably outweighed by the benefits of the Morgan Offshore Wind Project.</p>	<p>Stena Line and the Applicant are engaging on this matter. The first meeting was 18/10/2024 and meetings have continued since. These discussions remain ongoing under a Non-Disclosure Agreement.</p> <p>On the basis that at this time, the parties have not yet entered into an agreement and discussions remain ongoing, the matter of mitigation remains to be settled as the Examination draws to a close. Stena would therefore require some security in the event that the parties fail to enter into an agreement. It is suggested that such protection would be in the form of a protective provision in the DCO itself</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
			(wording for which will be submitted by Stena at Deadline 6).	
<b>Cumulative Regional Navigational Risk Assessment (CRNRA)</b>				
STENA.SN.17	Assessment of the effects from the Morgan Generation Assets cumulatively (excluding Moir Vannin Offshore Wind Farm Scoping Boundary)	Hazards and impacts identified as relevant to the Morgan Generation Assets in combination with cumulative projects (excluding Moir Vannin Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed in meeting 12/09/24.	Agreed
STENA.SN.18		Hazards relating to the cumulative scenario (excluding Moir Vannin Scoping Boundary) have been assessed as either Broadly Acceptable or Tolerable (if ALARP) and there are no unacceptable hazards.	The NRA post reduction of the Red line boundary has returned risk levels as ALARP however we must still highlight that the risk level post development in comparison to the current level is appreciably raised.	Position Agreed but with concerns outstanding
STENA.SN.19		<p>The mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (excluding Moir Vannin Scoping Boundary) can be considered ALARP without the need for additional risk control measures.</p> <p>1) Following discussion with Stena Line on 01/10/2024, Stena Line confirmed they understand the intention for the VTMP therefore Item 1 in Stena Line's position is agreed. The Outline Vessel Traffic Management Plan (APP-071) has been updated at Deadline 2 and 5 to include further details around the engagement on plans through the Marine Navigation Engagement Forum. Vessel traffic monitoring required for MCA (MGN654) is set out in the In</p>	<p>1. We need to know how the Vessel Traffic Management Plan (VTMP) will be monitored and co-ordinated from a practical perspective (Agreed).</p> <p>2. ETV's from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk and because the time available to the Master of a disabled vessel is limited due to the proximity of adjacent turbines an ETV to cover the area would be very beneficial. Stena notes that the Applicant's final position that the Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. In this respect it is reiterated that upon such consideration by the MCA an ETV to cover the area would be very beneficial. (Concerns Outstanding).</p> <p>3. Stena notes that the Applicant's final position is that the Applicant will not indemnify shipping operators from losses or damages to the Applicant incurred through the emergency use of anchors, brought about by Force Majeure</p>	<p>1. Agreed</p> <p>2. Concerns outstanding</p> <p>3. Not agreed</p>

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>Principle Monitoring Plan (APP-066) as part of the Navigation Monitoring Strategy.</p> <p>2) <b>Final position:</b> as per MCA response to ExQ2 (REP5-069) the Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. While the assessment of towing capability would be secured via the Vessel Traffic Management Plan, details of towing capability would be required to be contained within the ERCoP, or an update to the ERCoP.</p> <p>3) <b>Final position:</b> The Applicant will not indemnify shipping operators from losses or damage incurred through emergency use of anchors during force majeure situations.</p>	<p>occurrences (Ongoing). Stena therefore has concerns in respect of the effects upon its operations. (Not agreed)</p>	
STENA.SN.20		The Morgan Generation Assets in combination with cumulative projects (excluding Mooir Vannin Scoping Boundary) would not interfere with traffic separation schemes (TSS).	<p>Disagree. The Morgan project potentially requires three of Stena lines Belfast – Liverpool RoRo's to deviate up to twice a day each.</p> <p>We contend that our current passage is a recognised sea lane.</p>	Not agreed
STENA.SN.21		<p>The Morgan Generation Assets in combination with cumulative projects (excluding Mooir Vannin Scoping Boundary) could have potential significant effects due to:</p> <ul style="list-style-type: none"> <li>Adverse weather routing for Stena Line</li> </ul>	Agreed in meeting 12/09/24.	Position Agreed but with concerns outstanding
STENA.SN.22		<p>All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (excluding Mooir Vannin Scoping Boundary) would not be significant in EIA terms with proposed mitigation measures in place.</p> <p>See Applicant's position for STENA.SN.14 regarding radar.</p>	While the position was made by the Applicant during the Simulation exercises that Marine Radar is not significantly affected by the proximity of wind turbines, the National Academies of Sciences, Engineering, and Medicine, 2022 paper Wind Turbine Generator Impacts to Marine Vessel Radar gives us cause for concern that such interference is not fully evaluated in particular when passing between two ORE projects.	Position Agreed but with concerns outstanding

## MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
			<p>Discussed in meeting 01/11/24 - The Applicants additional clarifying points are well noted. We continue to believe that there is an element of uncertainty as to the level of interference if at all.</p> <p>The Swedish government has rejected applications for 13 offshore wind farm applications in Baltic Sea citing their military's concerns with regards to the possible effect on radar.</p> <p>While the report does not specify the areas of the radio spectrum effected it would be reassuring to understand if the Marine bands are included ie 3.02–3.1 GHz (S band) or 3.1–9.45 GHz (S and X band).</p> <p>Stena notes that the Applicant's final position that the Applicant will discuss the need for providing in-field, marine band VHF radio communications aerial(s) that can cover the entire wind farm site and its surrounding area with the MCA post consent/pre-construction stage.</p>	
STENA.SN.23	Mitigation (cumulative excluding Mooir Vannin)	<p>With regards to the impact of adverse weather routing and impact to strategic and lifeline ferries, the parties are engaging on the nature of the solution required to address the residual moderate adverse effects.</p> <p><b>Final Position:</b> The Applicant will continue to engage on the terms of a commercial agreement and, should this be agreed, will report this to the Secretary of State. The Applicant does not consider than any protective provisions are necessary or justified and, even if a commercial agreement is not reached, any residual impact is considerably outweighed by the benefits of the Morgan Offshore Wind Project.</p>	<p>Stena Line and the Applicant are engaging on this matter. The first meeting was 18/10/2024 and meetings have continued since. These discussions remain ongoing under a Non-Disclosure Agreement.</p> <p>On the basis that at this time, the parties have not yet entered into an agreement and discussions remain ongoing, the matter of mitigation remains to be settled as the Examination draws to a close. Stena would therefore require some security in the event that the parties fail to enter into an agreement. It is suggested that such protection would be in the form of a protective provision in the DCO itself (wording for which will be submitted by Stena at Deadline 6).</p>	Ongoing point of discussion
STENA.SN.24	Assessment of the effects from the Morgan Generation Assets	Hazards and impacts identified as relevant to the Morgan Generation Assets in combination with cumulative projects (including Mooir Vannin)	Agreed in meeting 12/09/24.	Agreed



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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.25	cumulatively (including Mooir Vannin Offshore Wind Farm Scoping Boundary)	Scoping Boundary) have been assessed within the shipping and navigation assessment.		
		<b>Final position:</b> The Applicant has undertaken an update to the CRNRA Appendix D to determine whether there would now be sufficient searoom for safe navigation. This process involved stakeholder engagement, further navigation simulations and additional analysis. The assessment concludes that 4.1nm meets relevant guidance and enables vessels to navigate in full compliance with the COLREGs and the practice of good seamanship. Therefore, the risks are reduced to Tolerable and As Low As Reasonably Practicable without the need for further mitigation.	Agreed in meeting 12/09/24.  The Red line boundary to the Northern end of Morgan was reduced to provide for sufficient seaway for Marine traffic between it and the Walney extension. Applying the same rationale, Stena Line is of the view that the seaway between Morgan and Mooir Vannin is also too narrow. It is noted that the Applicant's assessment concluded that 4.1nm meets relevant guidance and enables vessels to navigate in full compliance with the COLREGs and the practice of good seamanship. Stena Line would, however, flag that, at this time, the Mooir Vannin project has yet to be submitted and as such the Scoping Boundary is not set in stone and could indeed still be subject to amendment by the Applicant for Mooir Vannin, such that the distance is further narrowed. There is, as a result, therefore a lack of certainty on which the assessment of ALARP has been based. This means that when the examination closes Stena Line will have no guarantee/certainty regarding the resolution of an issue that potentially affects the safety of passage of its vessels. This is not acceptable.	Position Agreed but with concerns outstanding
STENA.SN.26		The mitigation measures described within Table 1.9 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) are appropriate. Further mitigation measures identified (but not adopted) in Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (including Mooir Vannin Scoping Boundary) can be considered ALARP without the need for additional risk control measures.	<ol style="list-style-type: none"> <li>1. We need to know how the Vessel Traffic Management Plan (VTMP) will be monitored and co-ordinated from a practical perspective (Agreed).</li> <li>2. ETV's from Table 1.42 of Volume 4, Annex 7.1: Navigational Risk Assessment. This is scored as medium risk and because the time available to the Master of a disabled vessel is limited due to the proximity of adjacent turbines an ETV to cover the area would be very beneficial. Stena notes that the Applicant's final position that the</li> </ol>	<ol style="list-style-type: none"> <li>1) Agreed</li> <li>2) Concerns outstanding</li> <li>3) Not agreed</li> </ol>



## MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
		<p>1) Following discussion with Stena Line on 01/10/2024, Stena Line confirmed they understand the intention for the VTMP therefore Item 1 in Stena Line's position is agreed. The Outline Vessel Traffic Management Plan (APP-071) has been updated at Deadline 2 and 5 to include further details around the engagement on plans through the Marine Navigation Engagement Forum. Vessel traffic monitoring required for MCA (MGN654) is set out in the In Principle Monitoring Plan (APP-066) as part of the Navigation Monitoring Strategy.</p> <p>2) <b>Final position:</b> as per MCA response to ExQ2 (REP5-069) the Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. While the assessment of towing capability would be secured via the Vessel Traffic Management Plan, details of towing capability would be required to be contained within the ERCoP, or an update to the ERCoP.</p> <p>3) <b>Final position:</b> The Applicant will not indemnify shipping operators from losses or damage incurred through emergency use of anchors during force majeure situations.</p>	<p>Applicant will discuss towing capability with the MCA post consent and/or pre-construction stage. In this respect it is reiterated that upon such consideration by the MCA an ETV to cover the area would be very beneficial. (Concerns Outstanding).</p> <p>3. Stena notes that the Applicant's final position is that the Applicant will not indemnify shipping operators from losses or damages to the Applicant incurred through the emergency use of anchors, brought about by Force Majeure occurrences. Stena therefore has concerns in respect of the effects upon its operations. (Not agreed).</p>	
STENA.SN.27		The Morgan Generation Assets in combination with cumulative projects (including Mooir Vannin Scoping Boundary) would not interfere with traffic separation schemes (TSS).	<p>We disagree with the position that only IMO recognised Traffic Separation Schemes constitute Sea lanes. UNCLOS refers to both separately and furthermore states in Article 60.7:</p> <p>"Artificial islands, installations and structures and the safety zones around them may not be established where interference may be caused to the use of recognized sea lanes essential to international navigation."</p>	Not agreed

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.28		The Morgan Generation Assets in combination with cumulative projects (including Mooir Vannin Scoping Boundary) could have potential significant effects on strategic routes and lifeline ferry services.	Agreed in meeting 12/09/24.	Position Agreed but with concerns outstanding
STENA.SN.29		<p>Other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (including Mooir Vannin Scoping Boundary) would not be significant in EIA terms with the proposed mitigation measures in place.</p> <p>See Applicant's position for STENA.SN.14 regarding radar.</p>	<p>While the position was made by the Applicant during the Simulation exercises that Marine Radar is not significantly affected by the proximity of wind turbines, the National Academies of Sciences, Engineering, and Medicine, 2022 paper Wind Turbine Generator Impacts to Marine Vessel Radar gives us cause for concern that such interference is not fully evaluated in particular when passing between two ORE projects.</p> <p>Discussed in meeting 01/11/24 - The Applicants additional clarifying points are well noted. We continue to believe that there is an element of uncertainty as to the level of interference if at all.</p> <p>The Swedish government has rejected applications for 13 offshore wind farm applications in Baltic Sea citing their military's concerns with regards to the possible effect on radar.</p> <p>While the report does not specify the areas of the radio spectrum effected it would be reassuring to understand if the Marine bands are included ie 3.02–3.1 GHz (S band) or 3.1–9.45 GHz (S and X band).</p> <p>Stena notes that the Applicant's final position that the Applicant will discuss the need for providing in-field, marine band VHF radio communications aerial(s) that can cover the entire wind farm site and its surrounding area with the MCA post consent/pre-construction stage. This means that when the examination closes Stena Line will have no guarantee/certainty regarding the resolution of an issue that potentially affects the safety of passage of its vessels. This is not acceptable.</p>	Position Agreed but with concerns outstanding

## MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
STENA.SN.30	Mitigation (cumulative including Mooir Vannin)	<p>The Applicant has made provision for mitigation for the cumulative scenario involving those projects for which it has sufficient information to mitigate or find solutions to offset effects. The Applicant has considered Mooir Vannin as far as reasonably practicable within its assessments. The reduction to the Morgan project boundary following Section 42 consultation increased the distance between the two projects and Mooir Vannin has subsequently increased the distance to 4.1nm by reducing their southern boundary following Scoping.</p> <p>The Applicant notes that in the Scoping Report by Mooir Vannin Offshore Wind Farm Limited (2023), the Shipping and Navigation impact assessment will be undertaken in line with the MCA MGN 654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, potential cumulative impacts and necessary mitigation will be considered by Mooir Vannin Offshore Wind Farm in its assessment and through the relevant planning process.</p> <p>The Applicant has undertaken an update to the CRNRA Appendix D to determine whether there would now be sufficient searoom for safe navigation. This process involved stakeholder engagement, further navigation simulations and additional analysis. The assessment concludes that 4.1nm meets relevant guidance and enables vessels to navigate in full compliance with the COLREGs and the practice of good seamanship. Therefore, the risks are reduced to Tolerable and As Low As Reasonably Practicable without the need for further mitigation.</p>	<p>Stena Line had requested that the Mooir Vannin project be considered by the same NRA process as Morgan, Mona and Morecambe viewing it as an adjacent transboundary development.</p> <p>Stena Line raised in Section 42 consultation that the Applicant was aware that the Mooir Vannin project was in progress.</p> <p>Stena Line contends that Mooir Vannin's proximity to Morgan will require some accommodation to provide for safe navigation between two projects in the same way that the Northern red line boundary for Morgan was reduced due to its proximity to the Walney Extension.</p> <p>Discussed in meeting 01/11/24</p> <p>As with STENA.SN.2(b)</p> <p>On the basis that the Applicant agrees with the position that there is insufficient space between Morgan Array Area and Mooir Vannin, Stena Line can accept that there is a position of agreement on this point however we would appreciate a clarification as to how both parties would propose that this is addressed between the two applicants (Morgan and Mooir Vannin)</p> <p>The navigation simulation, which were attended by both operators and the MCA on 21 January 2025 still returned High and Medium risks scored.</p> <p>It is noted that the Applicant's assessment concluded that 4.1nm meets relevant guidance and enables vessels to navigate in full compliance with the COLREGs and the practice of good seamanship. Stena Line would in response, however, flag that: (i) ALARP is of little relevance in terms of vessels passing between two separate arrays; (ii) Stena Line is not in a position to be able to agree the acceptability of the proposals until the Moor Vannin project has confirmed their red line</p>	Position Agreed but with concerns outstanding

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Reference Number	Discussion point	Applicant's Position	Stena Line Position	Status
			boundary. At this time, the Moir Vannin project has yet to be submitted and as such the Scoping Boundary is not set in stone and could indeed still be subject to amendment by the Applicant for Moir Vannin, such that the distance is further narrowed. There is, as a result, therefore a lack of certainty. This means that when the examination closes Stena Line will have no guarantee/certainty regarding the resolution of an issue that potentially affects the safety of passage of its vessels. This is not acceptable..	