



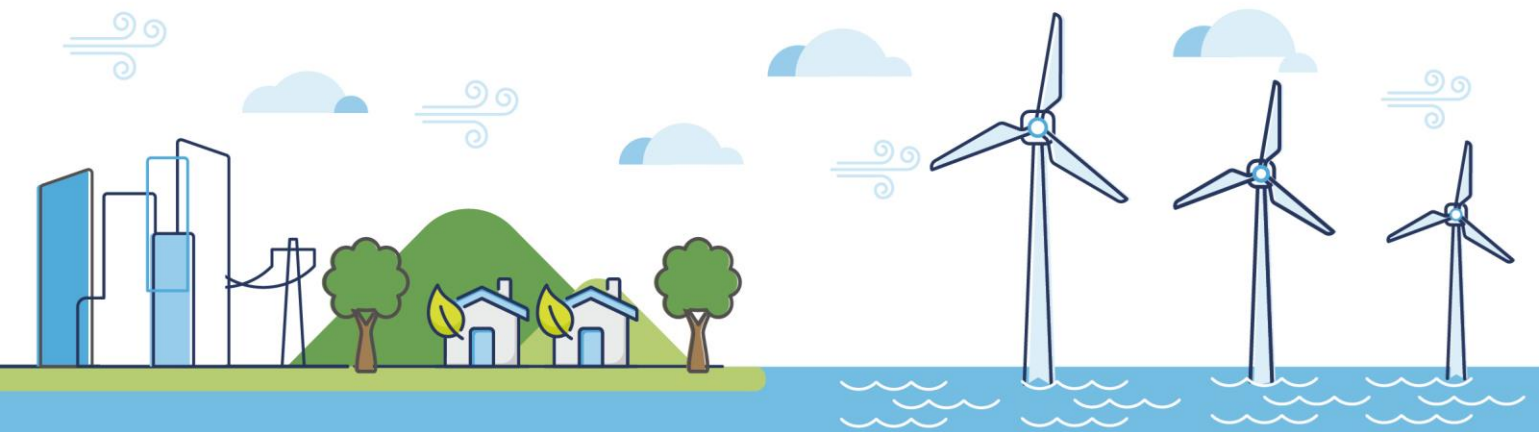
Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with UK Chamber of Shipping

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Glossary of Acronyms

AfL	Agreement for Lease
AIS	Automatic Identification System
ALARP	As Low As Reasonably Practicable
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Note
MNEF	Marine Navigation Engagement Forum
NRA	Navigation Risk Assessment
OSP	Offshore Substation Platform
OREI	Offshore Renewable Energy Installations
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
TSS	Traffic Separation Schemes
WTG	Wind Turbine Generator

Glossary of Units

km ²	square kilometre
MW	Megawatt

Glossary of Terminology

Agreement for Lease (AfL)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Applicant	Morecambe Offshore Windfarm Ltd
Application	This refers to the Applicant's application for a Development Consent Order (DCO). An application consists of a series of documents and plans which are published on the Planning Inspectorate's (PINS) website.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables would be present.



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1 Introduction

1.1 Overview of the Project

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The windfarm was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the windfarm was received in 2023.
3. The AfL comprises an area of up to 125km² and reflects the windfarm site assessed in the Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km².
4. The 'Project' relates the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSPs), and possible platform link cables to connect offshore substations).
5. A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

1.2 Purpose of this document

6. This draft Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from the United Kingdom (UK) Chamber of Shipping. This identifies topic areas where there is agreement, areas of disagreement, and areas which remain under discussion in relation to the Development Consent Order (DCO) application for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. The need for a SoCG between the Applicant and the UK Chamber of Shipping is set out in Section 1 of Appendix G of the Rule 6 letter issued by the Planning Inspectorate on 23 September 2024. The SoCG will be updated during the Examination and submitted at the Deadlines as agreed in the final Examination Timetable.
8. This draft SoCG has been structured to reflect topics of the DCO Application which are of interest to the UK Chamber of Shipping. The UK Chamber of Shipping is the trade association for the UK shipping industry, representing

200 members, operating 900 vessels equalling 18 million gross tonnes in capacity, across all vessel sectors. The UK Chamber of Shipping’s interest lies in ensuring the impact to navigational safety, commercial operation, and environmental performance are avoided, minimised as far as possible or suitably mitigated.

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

Table 1.1 Topics included in the draft SoCG

Topic/Chapter	PINS Reference
Draft DCO	APP-012
Chapter 14 Shipping and Navigation	APP-051
Appendix 14.1 Navigation Risk Assessment (NRA)	APP-073
Appendix 14.2 Cumulative Regional Navigation Risk Assessment (CRNRA)	APP-074
Chapter 20 Socio-economics, Tourism and Recreation	APP-057

1.3 Consultation

1.3.1 Pre-application

12. The Applicant has engaged with the UK Chamber of Shipping on the Project during the pre-application process, both in terms of informal non-statutory engagement and statutory consultation carried out pursuant to Section 42 of the Planning Act 2008.
13. The UK Chamber of Shipping provided comments on the PEIR on 2 June 2023 as part of the statutory consultation process.
14. The Applicant has engaged Shipping and Navigation consultees in extensive regional consultation throughout the pre-application process via the Marine Navigation Engagement Forum (MNEF) and hazard workshops as described

in **Table 2.1** in co-ordination with the Mona and Morgan Offshore Wind Projects.

15. Further details of this topic and relevant consultation held to date can be found in the Consultation Report (APP-015).

1.3.2 Post-application

16. UK Chamber of Shipping submitted a Relevant Representation (RR-084) in July 2024 that has been used to populate this draft SoCG.
17. The Applicant is committed to ongoing post-application engagement with the UK Chamber of Shipping. Following submission of the Application, meetings have been established with the UK Chamber of Shipping as detailed to date in **Table 2.1**.

1.3.3 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

18. In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or ‘in discussion’, the colour coding system set out in **Table 1.2** has been used.
19. Details on specific matters that are ‘Agreed’, ‘Not Agreed’ or ‘In Discussion’ are presented in **Table 2.2**.

Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

Position status	Position colour coding
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the UK Chamber of Shipping is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG.	Not Agreed – no material impact
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the UK Chamber of Shipping is considered to result in a materially different impact to the assessment conclusions.	Not Agreed – material impact
In Discussion The matter is neither ‘agreed’ or ‘not agreed’ and is a matter where further discussion is required between parties, for example, final wording of DCO conditions or where further information sharing/clarification is required.	In Discussion

2 Statements of Common Ground

20. A summary of the consultation undertaken to date with the UK Chamber of Shipping and the matters agreed, in discussion or not agreed (based on discussions and information exchanged between the Applicant and the MMO during the pre-application phase) are set out below for each of the draft SoCG topic areas.

Table 2.1 Summary of consultation

Date	Contact type	Owner	Topic
Pre-application			
9 February 2022	Online meeting	Applicant	To provide an overview of Scoping Report, key impacts and agree ways forward for NRA methodology for the Project.
6 May 2022	MNEF online meeting	Applicant	To discuss navigation safety, cumulative assessments with the Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets and development of the CRNRA.
9 August 2022	Online meeting	Applicant	Meeting with ferry operators, MCA, TH and UK Chamber of Shipping to provide an update on shipping and navigation project timeline and upcoming assessments. Also, to present ferry operator passage plans, alongside (Automatic Identification System (AIS)) data and refine understanding of passage planning and adverse weather routeing.
10 October 2022	MNEF online meeting	Applicant	Online meetings to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
12 October 2022	PEIR Hazard Workshop	Applicant	In-person hazard workshop, attended by representatives from ferry operators, regulators, commercial bodies, IoM Government, oil and gas, ports, fishing communities and recreational users.
18 January 2023	MNEF online meeting	Applicant	Online meeting to discuss navigation safety and cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets pre-PEIR. Project update on boundary amendments and how commitments will be tested post PEIR.

Date	Contact type	Owner	Topic
2 June 2023	Response to statutory consultation including the PEIR	UK Chamber of Shipping	UK Chamber of Shipping response to the PEIR.
21 September 2023	MNEF online meeting	Applicant	Online meeting to provide project updates and review of site boundary changes made since PEIR by the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
28 and 29 September 2023	ES Hazard Workshop	Applicant	In-person updated hazard workshop to inform the updated NRA/CRNRA for the Environmental Statement (ES), attended by representatives from ferry operators, regulators, commercial bodies, oil and gas, ports, fishing communities and recreational users.
8 February 2024	MNEF online meeting	Applicant	MNEF online meeting to provide Project updates.
Post-application			
20 September 2024	Online meeting	Applicant	Discussion on Relevant Representation and Statement of Common Ground for the Project.

Table 2.2 Topics agreed, in discussion or not agreed with the UK Chamber of Shipping in relation to shipping and navigation

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
Environmental Impact Assessment (EIA) and NRA – Shipping and Navigation				
COS 1	Consultation	The Chamber of Shipping has been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
COS 2	Policy and planning	The assessment has identified appropriate plans, policies and guidance (including Marine Guidance Note (MGN) 654) relevant to shipping and navigation and has attended to them within the assessment (see Section 14.4.1 of Volume 5, ES Chapter 14 Shipping and Navigation (APP-051) and Section 2 of Volume 5, Appendix 14.1 NRA (APP-073).	Agreed	Agreed
COS 3	Surveys	The vessel traffic surveys were conducted in accordance with MGN 654.	Agreed	Agreed
COS 4	Baseline environment	Sufficient data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
COS 5	Assessment methodology	The Formal Safety Assessment approach utilised within the NRA (APP-073) (outlined in Section 2.2.2) and for the assessment of effects (Section 14.7) within the ES (APP-051) is deemed appropriate for the purposes of predicting potential effects on shipping and navigation receptors and	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
		in-line with the approach outlined within the 'Methodology for assessing Marine Navigational Safety & Emergency Response Risks of Offshore Renewable Energy Installations (OREI)'.		
COS 6		The quantitative risk modelling methods used within the NRA to assess collision and allision risk are appropriate and in line with relevant guidance.	Agreed	Agreed
COS 7		Hazard Workshops (for the NRA, and for the CRNRA) were undertaken allowing adequate stakeholder input into the shipping and NRA (outlined in Table 43 of the NRA (APP-073), and Appendix B of the CRNRA (APP-074)) and are reflected within the conclusions laid out in Section 11 of the NRA (APP-073) and Section 9 of the CRNRA (APP-074).	Agreed	Agreed
COS 8		The navigation simulations were conducted in a fair and reasonable manner, and are appropriate for informing the NRA (APP-073) and CRNRA (APP-074).	Agreed	Agreed
COS 9		The assessment of effects in the ES (Section 14.7 of Chapter 14 Shipping and Navigation (APP-051)) has been undertaken based on an appropriate maximum design scenario (outlined in	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
		Table 11 in the NRA (APP-073)) for shipping and navigation.		
COS 10		The assessment within – the NRA (APP-073) and ES Chapter 14 Shipping and Navigation (APP-051) has been undertaken in line with relevant shipping and navigation legislation and guidance.	Agreed	Agreed
COS 11	Assessment of the Project-alone (in isolation) effects	Hazards and impacts identified as relevant to the Project have been appropriately identified and assessed within the NRA (APP-073).	Agreed	Agreed
COS 12		The potential effects identified in ES Chapter 14 Shipping and Navigation (APP-051) represent a comprehensive list of potential effects on shipping and navigation from the Project.	Agreed	Agreed
COS 13		All identified hazards have been assessed as either Medium Risk – Tolerable (if ALARP) or Broadly Acceptable for the Project alone assessment and there are no unacceptable hazards. Risk controls for the Project were reviewed with stakeholders at the hazard workshop. No further additional risk controls were identified for the Project. Therefore, the NRA concludes that where risks are scored as Medium, they can be considered to be ALARP	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
		and therefore Tolerable without the need for additional risk control measures		
COS 14		The Project would not interfere with the use of recognised sea lanes (such as Traffic Separation Schemes (TSS)) essential to international navigation.	Agreed	Agreed
COS 15		The Project alone would not have significant effects on lifeline ferry services or strategic routes and all Project alone effects on ferry services are not considered to have significant operational impacts.	Agreed	Agreed
COS 16		All other identified impacts (including impacts on search and rescue, radar and communications and recreational users) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed	Agreed
COS 17	Assessment of cumulative effects	Relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	Agreed	Agreed
COS 18		Hazards and impacts relevant to the Project in combination with cumulative projects have been assessed within the shipping and navigation assessments, including the CRNRA (APP-074).	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
COS 19		<p>All identified navigational safety hazards relating to the cumulative scenario for Morecambe, Mona and Morgan projects (including associated Transmission Assets) (excluding Moor Vannin)</p> <p>have been assessed to either Medium Risk – Tolerable if ALARP or Broadly Acceptable and there are no unacceptable hazards.</p>	Agreed	Agreed
COS 20		<p>The two hazards (described below) assessed as unacceptable are between Morgan Array Area and Moor Vannin Scoping Boundary and are not materially caused or risk increased by the Project.</p> <p>Allision and collision risk hazards between the Morgan Array Area and Moor Vannin Scoping Boundary were assessed through the CRNRA addendum as unacceptable. All other hazards relating to the cumulative scenario (including Moor Vannin) have been assessed to either Medium Risk – Tolerable if ALARP or Broadly Acceptable.</p>	Agreed	Agreed
COS 21		The Project in combination with cumulative projects would not interfere	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
		with the use of recognised sea lanes (such as TSS) essential to international navigation.		
COS 22		Commercial vessel (including passenger and lifeline ferry) routes have been appropriately identified and modelled (baseline and future-case).	Agreed	Agreed
COS 23		<p>The Project in combination with cumulative projects (including Mooir Vannin) could have potential significant effects on lifeline ferry services between Liverpool and Belfast in adverse weather conditions.</p> <p>The partial contribution of the Project is not considered to be material to the level of significance assigned, with effects still considered to be significant in the absence of the Project..</p>	In Discussion	In Discussion
COS 24		Contribution of the Project to impacts on other ferry services routes are minor and not considered to contribute to significant operational impacts.	Agreed	Agreed
COS 25		All other identified impacts (including impacts on search and rescue, radar and communications and recreational users) assessed for the cumulative scenario are ALARP and not significant in EIA terms with the proposed mitigation measures in place.	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
COS 26	Mitigation	The mitigation measures described within Chapter 14 Shipping and Navigation (APP-051), NRA (APP-073) and CRNRA (APP-074) are appropriate. Further mitigation measures identified (but not adopted) in the NRA (APP-073) and in Table 46 of the CRNRA (APP-074) would be disproportionate and therefore all medium risk hazards relating to the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) can be considered ALARP without the need for additional risk control measures. (relates to risk control options 1 to 9 (inclusive) and 11 in Table 46 of the CRNRA)	In Discussion	In Discussion
COS 27		As per CoS.SAN.21a but relates to risk control option 10 in Table 46 of the CRNRA (APP-074))	When considering the additional risk from cumulative projects in the Irish Sea over the period of operation, the Chamber view is that additional towing capability or resource may be required.	In Discussion
COS 28	Transboundary effects	No likely significant transboundary effects have been identified for the Project as no significant impact was identified, this includes passenger routes operating to Ireland or Belgium.	In Discussion	In Discussion
Environmental Impact Assessment (EIA) Socio Economics and indirect effects				

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
COS 29	Assessment of Project alone socio-economic effects	Commercial effects on shipping and navigation receptors (including ferry operators) were not specifically detailed in the Chapter 20 Socio-economics, Tourism and Recreation (APP-057), the commercial effects of routeing are incorporated into the conclusions of significance in ES Chapter 14 Shipping and Navigation (APP-051). No significant effects to shipping operations have been identified as a result of the Project alone, as noted in the NRA (APP-073) and ES Chapter 14 Shipping and Navigation (APP-051).	In Discussion	In Discussion
COS 30	Assessment of socio-economic cumulative effects	Commercial effects on shipping and navigation receptors (including ferry operators) were not specifically detailed in the Chapter 20 Socio-economics, Tourism and Recreation (APP-057), the commercial effects of routeing are incorporated into the conclusions of significance in ES Chapter 14 Shipping and Navigation (APP-051). Significant cumulative impacts on some ferry operations (relating to routeing impacts) have been identified within ES Chapter 14 Shipping and Navigation (APP-051).	In Discussion	In Discussion

Topic/ref.	Discussion Point	Applicant's position	UK Chamber of Shipping's position	Position summary
		<p>The Applicant is now engaging with relevant individual stakeholders to seek agreement on the commercial impacts, and the contribution made by the Project to effects.</p> <p>Such engagement is operational and commercial in nature.</p>		

3 Signatures

21. The above draft SoCG is agreed between the UK Chamber of Shipping and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the UK Chamber of Shipping	
Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for an on behalf of the Applicant	

4 References

DESNZ (2024) Overarching National Policy Statement for Energy (EN-1)

DESNZ (2024) Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3)

IMO (2018). Revised Guidelines for Formal Safety Assessment (FSA) for use in the Rule Masking Process MSC-MEPC.2/Circ.12/Rev.2.

MCA (2021). MGN 654 Annex 1: Methodology for Assessing the Marine Navigational Safety and Emergency Response Risks of Offshore Renewable Energy Installations (OREI).

Morecambe Offshore Windfarm Ltd (2024) Consultation Report (APP-015)

Morecambe Offshore Windfarm Ltd (2024) Draft DCO (APP-012)

Morecambe Offshore Windfarm Ltd (2024) Chapter 14 Shipping and Navigation (APP-051)

Morecambe Offshore Windfarm Ltd (2024) Appendix 14.1 Navigational Risk Assessment (APP-073)

Morecambe Offshore Windfarm Ltd (2024) Appendix 14.2 Cumulative Regional Navigational Risk Assessment (APP-074)

Morecambe Offshore Windfarm Ltd (2024) Chapter 20 Socio-economics, Tourism and Recreation (APP-057)