Morecambe Offshore Windfarm: Generation Assets

Examination Documents

Volume 9

Statement of Common Ground with Stena Line

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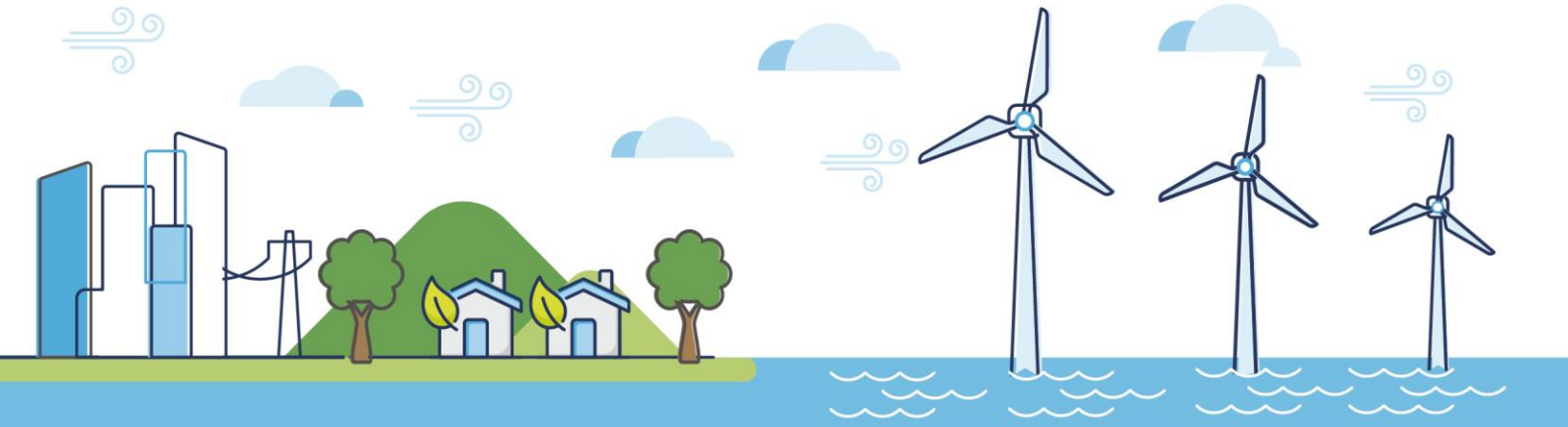

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02	18 February 2025	Approved for Use	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Morecambe Offshore Windfarm Ltd	Updated for Deadline 4

Contents

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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
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
MNEF	Marine Navigation Engagement Forum
NRA	Navigational Risk Assessment
OSP	Offshore Substation Platform
PEIR	Preliminary Environmental Information Report
SoCG	Statement of Common Ground
UNCLOS	United Nations Convention on the Law of the Sea
TSS	Traffic Separation Schemes
UK	United Kingdom
PINS	Planning Inspectorate
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 125km^2 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 87km^2.

4. The 'Project' relates to 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 OSP(s)).

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 Stena Line Limited ('Stena Line'). 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 Stena Line 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 indicated in the Rule 6 letter.

8. This draft SoCG has been structured to reflect topics of the DCO Application which are of interest to Stena Line. Stena Line operates six passenger and freight roll-on/roll-off vessels in this area on three separate routes.

9. Matters that are not yet agreed will be the subject of ongoing discussion ('In Discussion') between the Applicant and Stena Line 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 Stena Line. The phrase 'Not Agreed' identifies any points not agreed between the Applicant and Stena Line.

11. **Table 1.1** lists topics and documents of the Application which are of key interest to Stena Line.

Table 1.1 Documents relevant to the draft SoCG

Topic/Chapter	PINS Reference
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 Stena Line 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. Stena Line 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, as well as the Morgan and Morecambe Offshore Wind Farms: Transmission Assets.

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. The Applicant is committed to ongoing post-application engagement with Stena Line. Following submission of the Application, meetings have been established with Stena Line as detailed to date in **Table 2.1**.

1.3.3 Summary of 'Agreed', 'Not Agreed' and 'In Discussion' matters

17. 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.

18. 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 Stena Line is not considered to result in a material impact to the assessment conclusions.	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 Stena Line 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
Position Agreed but with concerns outstanding	Position Agreed but with concerns outstanding

2 Statements of Common Ground

19. **Table 2.1** provides a summary of the consultation undertaken to date in relation to shipping and navigation. Thereafter, **Table 2.2** sets out the topics agreed, in discussion or not agreed with Stena Line as informed by the consultation and information exchanged between the Applicant and Stena

Line during the pre-application and examination phases of the DCO Application.

Table 2.1 Summary of consultation

Date	Contact type	Owner	Topic
Pre-application			
7 January 2022	Online meeting	Applicant	Online introductory meeting to provide an overview of the Project, indicative timelines and upcoming survey plan and methodology.
7 February 2022	Online meeting	Applicant	Online meeting to provide an overview of the Scoping Report, key impacts to ferry operations and agree ways forward for Navigation Risk Assessment (NRA) methodology for the Project.
6 May 2022	MNEF online meeting	Applicant	Online meeting to disseminate information regarding cumulative navigation assessments and discuss any key navigation concerns.
9 August 2022	Online meeting	Applicant	Online meeting with Stena Line ferry operators, Maritime and Coastguard Agency, Trinity House and 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.
11 and 12 August 2022	Online meeting	Applicant	Bridge Simulation Preparations for the cumulative assessments.
23 to 25 August 2022	Bridge simulations	Applicant	Bridge Simulations for the cumulative assessments with Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets.
10 October 2022	MNEF online meeting	Applicant	Online meetings to disseminate information regarding cumulative navigation

Date	Contact type	Owner	Topic
			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.
23 to 25 May 2023	Bridge simulations	Applicant	Update to Bridge Simulations for the cumulative assessments with the Project, Mona Offshore Wind Project and Morgan Offshore Wind Project Generation Assets to inform the ES. The updated simulations reflected the site boundary changes made since PEIR by the three projects.
2 June 2023	Response to statutory consultation including the PEIR	Stena Line	Stena Line 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 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.

Date	Contact type	Owner	Topic
13 December 2023	Online meeting	Applicant	Online meeting to provide project updates, including review of engagements and assessments, and cumulative impacts associated with the Mooir Vannin Offshore Wind Farm.
8 February 2024	MNEF online meeting	Applicant	MNEF online meeting to provide Project updates.
22 February 2024	Online meeting	Applicant	Online meeting with Stena Line to provide a Project update and to discuss any residual concerns.
Post-application			
20 September 2024	Online meeting	Applicant	Discussion on Relevant Representation and Statement of Common Ground for the Project.
12 November 2024	Online meeting	Applicant	Discussion on the Statement of Common Ground for the Project.
22 November 2024	Online meeting	Applicant	Discussion on the Statement of Common Ground for the Project.
7 January 2025	Online meeting	Applicant	Discussion on the Statement of Common Ground for the Project.
14 February 2025	Online meeting	Applicant	Discussion of the draft protective provisions and on the Statement of Common Ground for the Project.

Table 2.2 Topics agreed, in discussion or not agreed with the Stena Line in relation to shipping and navigation

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
Environmental Impact Assessment (EIA) and NRA				
SL 1	Consultation	Stena Line has been adequately consulted on shipping and navigation matters to date.	Agreed	Agreed
SL 2	Policy and planning	The assessment has identified all appropriate plans, policies and guidance relevant to shipping and navigation and has given due regard to them within the Shipping and Navigation 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 Navigation Risk Assessment (NRA) (APP-073).	Agreed	Agreed
SL 3	Baseline environment	Sufficient data has been collated to appropriately characterise the baseline environment.	Agreed	Agreed
SL 4	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 Stena Line vessel routeing.	Agreed	Agreed
SL 5		Hazard Workshops (for the NRA, and for the CRNRA) were undertaken allowing adequate stakeholder input into the risk assessments (outlined in Table 43 of the NRA (APP-073), and Appendix B of the	Agreed	Agreed

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		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).		
SL 6		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 Table 11 in the NRA (APP-073)) for shipping and navigation to identify any effects to Stena Line operations.	Agreed	Agreed
SL 7	Assessment of the Project-alone impacts	Hazards identified as relevant to the Project have been appropriately identified and assessed within the Navigation Risk Assessment (APP-073).	Agreed	Agreed
SL 8		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 and considers appropriate impacts on Stena Line routes.	Agreed	Agreed
SL 9a		All identified hazards have been assessed as either Broadly Acceptable or Tolerable (and As Low As Reasonably Practicable (ALARP)) for the Project-alone assessment and there are no unacceptable hazards.	Stena Line accept that the NRA has returned a Broadly Acceptable or Tolerable (and As Low As Reasonably Practicable (ALARP)) for the Project-alone assessment .	Position Agreed but with concerns outstanding
SL 9b			While Stena Line accept that the NRA has returned a Broadly Acceptable or Tolerable (and As Low As Reasonably Practicable (ALARP))	Position Agreed but with

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
			for the Project-alone assessment it must still be highlighted and noted that the navigational risk level post development of the Project is appreciably increased above the current baseline level. This is identified to be particularly at the corners of the Project where there will be an increase in traffic encounters.	concerns outstanding
SL 10		The Project alone would not interfere with the use of recognised sea lanes (such as Traffic Separation Schemes (TSS)) essential to international navigation. In their response to the Morgan Generation project ExQ1, the MCA stated that 'in the context of paragraphs 2.8.316 and 2.8.317 in the National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3), 'sea lanes essential to international navigation' is understood to mean IMO-adopted Traffic Separation Schemes. The Applicant considers the Stena Line regular shipping routes to fall under NPS EN-3 Paragraph 2.8.328 as 'strategic routes essential to regional, national and international trade'. According to NPS EN-3 strategic routes can be disrupted, provided 'the site selection has been made with a view to avoid or minimise' the disruption (for example boundary changes post PEIR). The Applicant also notes that Stena Line currently operate multiple alternative routes between Great Britain and Northern Ireland	Stena Line has noted that the MCA's view is that Stena's Liverpool to Belfast route is not a route essential to international navigation in the context of paragraphs 2.8.316 and 2.8.317 the National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3). Whilst Stena Line accept that no Traffic Separation Schemes are impacted by the proposed Project alone it should however still be noted that there is a distinction between IMO recognised Traffic Separation Schemes and Sea lanes. United Nations Convention on the Law of the Sea (UNCLOS) refers to both separately and furthermore states in Article 60.7: "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." Regular shipping services between the two ports have existed since 1824 and proposals to construct on those sea lanes represents an "interference" with those shipping services, in respect of which the Applicant and Stena are in	In Discussion

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		which are unaffected by the Project, including between Heysham and Belfast, between Liverpool and Belfast, west of the Isle of Man, and between Liverpool and Belfast, east of Isle of Man and west of Calder.	the process of agreeing draft protective provisions for inclusion in the dDCO supported by a commercial side agreement to provide mitigation for residual operating impacts.	
SL 11		The Project alone would not have significant effects on lifeline ferry services and all Project alone effects on ferry services are not considered to have significant operational impacts. The Applicant and Stena Line have engaged on the drafting of protective provisions in favour of Stena Line to be included in the dDCO at Deadline 4 to provide mitigation for residual operational impacts, supplemented by a commercial side agreement which is subject to discussion between the parties.	Stena Line is in the process of agreeing draft the protective provisions with the Applicant, and continues to engage in discussions on the detail of a commercial side agreement to provide mitigation for residual operational impacts.	In Discussion
SL 12		All other Project alone effects (including radar and communications) have been assessed as not significant in EIA terms with the proposed mitigation measures in place. With regards to the impacts on radar, the Applicant refers to section 8.8 of the NRA (APP-073) which notes that spurious effects may be experienced, as detailed in the primary industry research. The Applicant notes, as recognised in this research and	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 close to or between two ORE projects. Furthermore, the Swedish government has rejected applications for 13 offshore wind farm	In Discussion

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		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 the Mona and Morecambe Array areas (5.7 nm separation), vessels can maintain in excess of 1.5 nm from the array boundaries and other vessels and therefore mitigate the effects on radar as per MGN 372 Amendment 1 Section 2.9.2. The Applicant is in further discussion with Stena Line to understand their specific concerns relating to impacts on marine navigational radar. The Applicant has undertaken a preliminary review of the potential effects of the Project on marine navigational radar systems used on Stena Line assets/vessels, focusing on the impact of WTG placement (i.e. distance between the WTG and future routes used by Stena Line) and WTG separation (i.e. the minimum distances between WTG as set out in the dDCO). This review concludes that given the WTG placement (minimum 2km between turbine and vessels) and the WTG separation (minimum 1,060m between WTG) there will be no significant impact on marine navigational safety from a radar interference perspective.	applications in Baltic Sea in early November 24 citing their military's concerns with regards to the possible effect on radar. 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) We continue to believe that there is an element of uncertainty as to the level of interference which can be expected. Stena Line welcomes further discussions with the Applicant in respect of concerns relating to impacts on marine navigational radar. Stena Line is currently awaiting receipt of a technical note from the Applicant reporting the outcome of its review of the potential effects of the Project on marine navigational radar systems used on Stena Line assets/vessels for its consideration.	

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
SL 13	Assessment of cumulative effects	All relevant cumulative projects have been identified and considered within the shipping and navigation assessments.	Agreed	Agreed
SL 14		Hazards and impacts relevant to the Project in combination with cumulative projects have been appropriately assessed within the shipping and navigation assessments, including the CRNRA (APP-074).	Agreed	Agreed
SL 15a		All identified navigational safety hazards relating to the cumulative scenario for Morecambe, Mona and Morgan projects (including associated Transmission Assets) have been assessed as acceptable.	Stena Line accept that the CRNRA has returned an Acceptable.	Position Agreed but with concerns outstanding
SL 15b			While Stena Line note that the CRNRA has returned an Acceptable rating it should still however be highlighted and noted that the navigational risk level is is appreciably increased above the current baseline. This is identified as having a potential to occur at the corners of the projects where there will be an increase in traffic encounters due to traffic funnelling. In essence the development of these four proposed projects changes an open water navigational passage to a near coastal passage at best and at times to a near pilotage situation from a Bridge resources management perspective.	Position Agreed but with concerns outstanding

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
SL 16		All except two hazards for the cumulative assessment that also included Mooir Vannin have been assessed as acceptable. The two hazards assessed as unacceptable were between Morgan and Walney and are not materially caused or risk increased by the Morecambe project.	Agreed	Agreed
SL 17		The Project in combination with cumulative projects would not interfere with the use of recognised sea lanes (such as TSS) essential to international navigation. In their response to the Morgan Generation project ExQ1, the MCA stated that 'in the context of paragraphs 2.8.316 and 2.8.317 in the National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3), 'sea lanes essential to international navigation' is understood to mean IMO-adopted Traffic Separation Schemes. The Applicant considers the Stena Line regular shipping routes to fall under NPS EN-3 Paragraph 2.8.328 as 'strategic routes essential to regional, national and international trade'. According to NPS EN-3 strategic routes can be disrupted, provided 'the site selection has been made with a view to avoid or minimise' the disruption (for example boundary changes post PEIR). The Applicant also notes that Stena Line currently operate multiple alternative routes between Great Britain and Northern Ireland	Stena Line accepts that the MCA's view is that Stena's Liverpool to Belfast route is not a route essential to international navigation in the context of paragraphs 2.8.316 and 2.8.317 the National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3). Whilst Stena Line accept that no Traffic Separation Schemes are impacted by the proposed project however we must make a distinction between IMO recognised Traffic Separation Schemes and Sea lanes. UNCLOS refers to both separately and furthermore states in Article 60.7: "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." It should be highlighted that even though the ports of Belfast and Liverpool fall under the jurisdiction of the United Kingdom the passage transit International waters. Regular shipping services between the two ports have existed since 1824 and proposals to	In Discussion

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		including between Heysham and Belfast, between Liverpool and Belfast, west of the Isle of Man, and between Liverpool and Belfast, east of Isle of Man and west of Calder.	construct in those sea lanes are an "interference" potentially requiring a cumulative deviation of 5.5 Nm per crossing, up to six times per day. The Applicant and Stena are in the process of agreeing draft protective provisions for inclusion in the dDCO supported by a commercial side agreement to provide mitigation for residual operating impacts relating to the Project alone.	
SL 18		The Project in combination with cumulative projects could have infrequent potential significant effects on ferry services between Liverpool and Belfast (east of Isle of Man) in adverse weather conditions. The contribution of the Project is not considered material to the level of significance assigned, with impacts driven by the other cumulative projects. The Applicant and Stena Line have engaged on the drafting of protective provisions in favour of Stena Line , to be included in the dDCO at Deadline 4 to provide mitigation for residual operational impacts from the Project alone, supplemented by a commercial side agreement which is subject to discussion between the parties.	Stena Line is in the process of agreeing draft protective provisions with the Applicant and continues to engage in discussions on the detail of a commercial side agreement to provide mitigation for residual operational impacts of the Project alone. .	In Discussion
SL 19		Contribution of the Project to impacts on other Stena Line services routes are minor	Stena Line operate at three routes in this area. Our services between Dublin and Liverpool and	Agreed

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		and not considered to contribute to significant operational impacts.	Belfast and Heysham are not materially affected by the Morecambe project.	
SL 20		All other cumulative effects (including radar and communications) have been assessed as not significant in EIA terms with the proposed mitigation measures in place. With regards to the impacts on radar, the Applicant refers to section 8.8 of the NRA (APP-073) 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 the Mona and Morecambe Array areas (5.7 nm separation), vessels can maintain in excess of 1.5 nm from the array boundaries and other vessels and therefore mitigate the effects on radar as per MGN 372 Amendment 1 Section 2.9.2. The Applicant is in further discussion with Stena Line to understand their specific concerns relating to impacts on marine navigational radar. The Applicant has undertaken a preliminary review of the potential effects of the Project on marine	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 close to or between two ORE projects. Furthermore, the Swedish government has rejected applications for 13 offshore wind farm applications in Baltic Sea in early November 24 citing their military's concerns with regards to the possible effect on radar. 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) We continue to believe that there is an element of uncertainty as to the level of interference which can be expected. Stena Line welcomes further discussions with the Applicant in respect of concerns relating to impacts on marine navigational radar. Stena Line is currently awaiting receipt of a technical note from the Applicant reporting the outcome of its review of the potential effects of the Project	In Discussion

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		navigational radar systems used on Stena Line assets/vessels, focusing on the impact of WTG placement (i.e. distance between the WTG and future routes used by Stena Line) and WTG separation (i.e. the minimum distances between WTG as set out in the dDCO). This review concludes that given the WTG placement (minimum 2km between turbine and vessels) and the WTG separation (minimum 1,060m between WTG) there will be no significant impact on marine navigational safety from a radar interference perspective.	on marine navigational radar systems used on Stena Line assets/vessels for its consideration.	
SL 21	Mitigation	The mitigation measures described within Section 14.3.3 and 14.7 of ES Chapter 14 Shipping and Navigation (APP-051) and Section 4.9 and 9.8 of the NRA (APP-073) and CRNRA (APP-074) are appropriate. The parties are in advanced discussions on the form of Protective Provisions for the benefit of Stena to include in the draft DCO and on the detail of a commercial side agreement. While these are not yet finalised (noting that the parties are aiming for Deadline 5 to do so), it is considered that, once agreed, the Protective Provisions and Commercial Side Agreement will resolve Stena's concerns. Until such point, however, many of the remaining discussion	Stena Line is in the process of agreeing draft protective provisions with the Applicant and continues to engage in discussions on the detail of a commercial side agreement to provide mitigation for residual operational impacts.	In Discussion

Topic/ref.	Discussion Point	Applicant's position	Stena Line's position	Position summary
		points in this Statement of Common Ground remain 'In Discussion'.		
SL 22	Transboundary	No likely significant transboundary effects have been identified for the Project, no significant impact has been identified for passenger routes operating to Ireland.	It is accepted that there is no significant impact identified on the ferry services to the Republic of Ireland however this is not the same for Northern Ireland.	Agreed
Other				
SL 23	Socio-economics	Consideration has been given to indirect effects of shipping and navigation on economic receptors assessed within the ES Chapter 20 Socio-economics, Tourism and Recreation (APP-057). Direct effects on ferry operations are assessed within ES Chapter 14 Shipping and Navigation (APP-051) the NRA (APP-073) and CRNRA (APP-074). The Applicant and Stena Line have engaged on the drafting of protective provisions in favour of Stena Line to be included in the dDCO at Deadline 4 to provide mitigation for residual operational impacts, supplemented by a commercial side agreement which is subject to discussion between the parties.	Stena Line is in the process of agreeing draft protective provisions with the Applicant and continues to engage in discussions on the detail of the commercial side agreement to provide mitigation for residual operational impacts. .	In Discussion

3 Signatures

20. The above draft SoCG is agreed between Stena Line and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of Stena Line	

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.

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 Navigation Risk Assessment (APP-073)

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

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