

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and UK Chamber of Shipping

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Image of an offshore wind farm

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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
DCO	Development Consent Order
EIA	Environmental Impact Assessment
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
OSP	Offshore Substation Platform
SoCG	Statement of Common Ground

1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND UK CHAMBER OF SHIPPING

1.1 Introduction

1.1.1 Overview

1.1.1.1 This initial Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and UK Chamber of Shipping, hereafter referred together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the Development Consent Order (DCO) application for the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the ‘Morgan Generation Assets’).

1.1.1.2 The need for a SoCG between the Applicant and UK Chamber of Shipping 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 UK Chamber of Shipping’s remit

1.1.2.1 The UK Chamber of Shipping (CoS) 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 CoS interest lies in ensuring the impact to navigational safety, commercial operation, and environmental performance are avoided or minimised as far as possible.

1.1.2.2 The elements of the Morgan Generation Assets which may affect the interests of UK CoS are detailed in Schedule 1 (Authorised Development), Part 1 (Authorised Development) of the Draft DCO (AS-003).

1.1.2.3 This SoCG covers the following topics of relevance to UK CoS:

- Assessment and proposed mitigation of effects on:
 - Navigation and safety, shipping routes and scheduled services (shipping and navigation)
 - Social and economic receptors.

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:

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- 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.

1.1.4 Approach to SoCG

1.1.4.1 This SoCG has been developed during the pre-Examination phase and will be 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 UK CoS 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 UK CoS 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 03 October 2024 (Deadline 1).

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, NRA, CRNRA)	Ongoing point of discussion
Social and economic receptors	Ongoing point of discussion

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1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with UK CoS during the pre-application phase of the Morgan Generation Assets.

1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicant with UK CoS during the post application phase of the Morgan Generation Assets.

Table 1.2: Summary of pre-application consultation with UK Chamber of Shipping.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
Marine Navigation Engagement Forum (MNEF)			
10/11/2021	Meeting 1	Non-statutory	<ul style="list-style-type: none"> • Project introduction and development process • Project timeline • Project Design (Scoping) and Refinement • Community and Maritime Engagement • MNEF purpose and ToR • Site selection in relation to shipping and navigation constraints • Impacts of COVID-19 on data collection.
06/05/2022	Meeting 2	Non-statutory	<ul style="list-style-type: none"> • Project update - review of key themes from previous meeting • Data Collection and NRA • Impacts to ferry operators • Relation of impacts on ferry routes with regulation and guidance • Sensitivity of ferry operator schedules. • Extent of incident data • Safety of navigating in gaps • Consequences of allisions with wind turbines.
10/10/2022	Meeting 3	Non-statutory	<ul style="list-style-type: none"> • Project update • Application process • Cumulative impacts of multiple projects on ferry operations (responding to stakeholder feedback) • How the cumulative impacts will be assessed or examined • Introduction to Morgan/Morecambe combined transmission project.
18/01/2023	Meeting 4	Non-statutory	<ul style="list-style-type: none"> • Project update • Cumulative assessment approach and progress • Update on assessment work completed since MNEF 3 – HAZID workshop, PEIR deliverables Morgan NRA, cumulative regional NRA and bridge simulations • PEIR process and statutory consultation • Project revisions and commitments • Planned activities and next steps.

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
21/09/2023	Meeting 5	Non-statutory	<ul style="list-style-type: none"> • Project update • Cumulative assessment approach and progress • PEIR assessment and key findings • Project revisions • Update on assessment work undertaken since MNEF 4 • DCO application process • Planned activities and next steps.
08/02/2024	Meeting 6	Non-statutory	<ul style="list-style-type: none"> • Project update • Update on assessment work undertaken since MNEF 5 and consideration of Moir Vannin Offshore Wind Farm) • DCO application process • Planned activities and next steps. • Cumulative assessment approach and progress.

Shipping and navigation consultation

14/02/2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Methodological engagement • Relation of impacts on ferry routes with regulation and guidance • Site selection in relation to shipping and navigation constraints • Impacts to ferry operators (Safety and Commercial) • Need for a cumulative assessment • Adverse weather routeing decision making • Need for collaborative engagement in assessment.
19/08/2022	Nav Sims	Non-statutory	<ul style="list-style-type: none"> • Attendance as observer at IoMSPC Nav Sims in HR Wallingford.
23/08/2022 – 24/08/2022	Nav Sims	Non-statutory	<ul style="list-style-type: none"> • Attendance as observer at Stena Nav Sims in HR Wallingford.
03/10/2022	Meeting	Non-statutory	<ul style="list-style-type: none"> • Online webinar to run through the approach and process for the Hazard workshop with all S&N stakeholder attendees.
10/10/2022- 11/10/2022	Hazard workshop	Non-statutory	<ul style="list-style-type: none"> • Morgan Generation Assets Hazard Workshop.
22/06/2023 – 23/06/2023	Nav Sims	Non-statutory	<ul style="list-style-type: none"> • Attendance as observer at Seatruck Nav Sims in HR Wallingford.
28/09/2023- 29/09/2023	Hazard workshop	Non-statutory	<ul style="list-style-type: none"> • In person hazard workshop • Cumulative NRA hazard workshop undertaken to inform the Environmental Statement • Morgan Generation Assets NRA hazard workshop undertaken to inform the Environmental Statement.

Statutory (Section 42) consultation

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Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
02/06/2023	Section 42 response	Statutory	<ul style="list-style-type: none"> • Impacts (safety and commercial) on vital shipping services • PEIR consultation given proposed changes to the Morgan Array Area boundary • Financial costs of fuel and increased emissions including impacts to hinterland supply chains and scheduling • Inclusion of the proposed Moor Vannin Offshore Wind Farm Scoping Boundary within the cumulative effects assessment.

Table 1.3: Summary of post-application consultation with UK Chamber of Shipping

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
19/06/2024	Relevant representations	Statutory	Relevant representations of UK CoS.
05/09/2024	Meeting	Non-statutory	Initial discussion on SoCG content and scope
20/09/2024	Via correspondence	Non-statutory	Review of SoCG for submission at Deadline 1

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.
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 (as identified in section 1.1.2).

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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	UK Chamber of Shipping Position	Status
Environmental Impact Assessment (EIA)				
UKCoS.SN.1	Policy and planning	The assessment has identified appropriate plans and policies relevant to shipping and navigation and has attended to them within the assessment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.2	Consultation	The CoS have been adequately consulted on shipping and navigation matters to date.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.3	Surveys	The vessel traffic surveys were conducted in accordance with Marine Guidance Note (MGN) 654 (MCA, 2021).	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.4	Baseline environment	Sufficient primary and secondary shipping and navigation data has been collated to appropriately characterise the baseline environment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.5	Baseline environment	Sufficient primary and secondary shipping and navigation data has been collated to appropriately characterise the baseline environment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.6	Baseline environment	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.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.7	Assessment methodology	The Formal Safety Assessment approach to the assessment of effects is deemed appropriate for the purposes of predicting potential effects on shipping and navigation receptors.	Agreed in meeting 05/09/2024	Agreed

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Reference Number	Discussion point	Applicant's Position	UK Chamber of Shipping Position	Status
UKCoS.SN.8	Assessment methodology	The quantitative risk modelling methods (e.g. International Association of Lighthouse Authorities (IALA) Waterway Risk Assessment Program (IWRAP) and encounter modelling) used to assess collision and allision risk are appropriate and align with relevant guidance.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.9	Assessment methodology	The assessment within Volume 4, Annex 7.1: Navigational Risk Assessment (APP-060) and Volume 2, Chapter 7: Shipping and navigation (APP-025) has been undertaken in line with relevant shipping and navigation legislation and guidance including MGN 654.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.10	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 05/09/2024	Agreed
UKCoS.SN.11	Assessment methodology	The Hazard Workshop was 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 05/09/2024	Agreed
UKCoS.SN.12	Assessment methodology	All relevant cumulative projects have been identified and are included within the shipping and navigation assessment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.13	Assessment methodology	Volume 2, Chapter 7: Shipping and navigation (APP-025) has identified, described and assessed an appropriate maximum design scenario for shipping and navigation.	Agreed in meeting 05/09/2024	Agreed
Navigation Risk Assessment (NRA) and ES Chapter				
UKCoS.SN.14	Assessment of the effects from the Morgan Generation Assets alone	All hazards and impacts identified as relevant to the Morgan Generation Assets have been assessed within the shipping and navigation assessment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.15		All hazards have been assessed as either Medium Risk – Tolerable if ALARP or Broadly Acceptable and there are no unacceptable hazards.	Agreed in meeting 05/09/2024	Agreed

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Reference Number	Discussion point	Applicant's Position	UK Chamber of Shipping Position	Status
UKCoS.SN.16	(in isolation) (NRA)	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.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.17		The Morgan Generation Assets would not interfere with the use of recognised sea lanes essential to international navigation (Traffic Separation Schemes).	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.18		The Morgan Generation Assets could have potential significant operational effects on lifeline ferry services and strategic routes due to adverse weather routing for Isle of Man Steam Packet Company (IoMSPC) route between Heysham and Douglas and Stena Line route between Heysham and Belfast and Liverpool and Belfast (east of the Isle of Man).	Agreed via correspondence 20/09/24	Agreed
UKCoS.SN.19		Operational impacts on other ferry services and strategic routes are not considered to be significant.	Agreed via correspondence 20/09/24	Agreed
UKCoS.SN.20		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) would not be significant in EIA terms with proposed mitigation measures in place.	Agreed in meeting 05/09/2024	Agreed

Cumulative Regional Navigation Risk Assessment (CRNRA) and ES Chapter

UKCoS.SN.21	Assessment of the effects from the Morgan Generation Assets cumulatively (excluding Moir Vannin Offshore Wind	All hazards and impacts identified as relevant to the Morgan Generation Assets in combination with cumulative projects (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed within the shipping and navigation assessment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.22		All hazards relating to the cumulative scenario (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed as either Medium Risk – Tolerable if ALARP or Broadly Acceptable and there are no unacceptable hazards.	Agreed in meeting 05/09/2024	Agreed

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Reference Number	Discussion point	Applicant's Position	UK Chamber of Shipping Position	Status
UKCoS.SN.23	Farm) (CRNRA)	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 Mooir Vannin Offshore Wind Farm Scoping Boundary) can be considered ALARP without the need for additional risk control measures.	CoS reviewing relevant material	Ongoing point of discussion
UKCoS.SN.24		The Morgan Generation Assets in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes essential to international navigation (Traffic Separation Schemes).	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.25		The Morgan Generation Assets in combination with cumulative projects (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant effects due to: <ul style="list-style-type: none"> • Adverse weather routing for IoMSPC routes between Liverpool and Douglas and Heysham and Douglas and Stena Line routes between Heysham and Belfast and Liverpool and Belfast (east of the Isle of Man) • Impact to commercial operators including strategic routes and lifeline ferries for Stena Line route between Liverpool and Belfast (east of the Isle of Man) 	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.26		Operational impacts on other ferry services and strategic routes are not considered to be significant.	Agreed	Agreed
UKCoS.SN.27		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (excluding Mooir Vannin Offshore Wind Farm Scoping Boundary) have been assessed not to be significant in EIA terms with proposed mitigation measures in place.	Agreed in meeting 05/09/2024	Agreed

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Reference Number	Discussion point	Applicant's Position	UK Chamber of Shipping Position	Status
UKCoOS.SN.28	Assessment of the effects from the Morgan Generation Assets cumulatively including Moir Vannin Offshore Wind Farm (CRNRA)	All hazards and impacts identified as relevant to the Morgan Generation Assets in combination with cumulative projects (including Moir Vannin) have been assessed within the shipping and navigation assessment.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.29		Allision and collision risk hazards between the Morgan Array Area and Moir Vannin Scoping Boundary was assessed as part of the CRNRA (APP-060) as unacceptable. All other hazards relating to the cumulative scenario (including Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed as either Medium Risk – Tolerable if ALARP or Broadly Acceptable.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.30		The Morgan Generation Assets in combination with cumulative projects (including Moir Vannin Offshore Wind Farm Scoping Boundary) would not interfere with the use of recognised sea lanes essential to international navigation (Traffic Separation Schemes).	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.31		The Morgan Generation Assets in combination with cumulative projects (including Moir Vannin Offshore Wind Farm Scoping Boundary) could have potential significant effects on commercial operators including strategic routes and lifeline ferry services. This includes those between: <ul style="list-style-type: none"> • Liverpool and Douglas • Heysham and Douglas • Heysham and Belfast • Liverpool and Belfast • Ramsey and Glasson. and excludes the route between Belfast and Douglas.	Agreed in meeting 05/09/2024	Agreed
UKCoS.SN.32		Operational impacts on other ferry services and strategic routes are not considered to be significant.	Agreed in meeting 05/09/2024	Agreed

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Reference Number	Discussion point	Applicant's Position	UK Chamber of Shipping Position	Status
UKCoS.SN.33		All other impacts (impacts on search and rescue, radar, communications and positioning systems, etc.) assessed for the cumulative scenario (including Moir Vannin Offshore Wind Farm Scoping Boundary) have been assessed not to be significant in EIA terms with proposed mitigation measures in place.	CoS reviewing relevant material.	Ongoing point of discussion

1.4.3 Social and economic receptors

1.4.3.1 The parties are engaging on an Agreement Log for socio-economics. At this stage, the Agreement Log is an ongoing point of discussion, and the parties will provide an updated SoCG at Deadline 3.