

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Statement of Common Ground between Morgan Offshore Wind Limited and Isle of Man Steam Packet Company

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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
ALARP	As Low As Reasonably Practicable
DCO	Development Consent Order
EIA	Environmental Impact Assessment
IoMSPC	Isle of Man Steam Packet Company
MNEF	Marine Navigation Engagement Forum
OSP	Offshore Substation Platform
SoCG	Statement of Common Ground

1 Statement of Common Ground between Morgan Offshore Wind Limited and Isle of Man Steam Packet Company

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 the Isle of Man Steam Packet Company (IoMSPC), 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 IoMSPC 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 IoMSPC’s remit

1.1.2.1 IoMSPC is the world's oldest continually operating passenger shipping company, providing essential ferry services between the Isle of Man and key ports in the United Kingdom and Ireland. IoMSPC operates a fleet of passenger and freight vessels, ensuring vital connectivity for the island's residents, businesses, and tourists.

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

1.1.2.3 This SoCG covers the following topics of relevance to IoMSPC:

1.1.2.4 Assessment and proposed mitigation of effects on:

- Shipping and lifeline ferry services
- Navigational safety

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 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 IoMSPC 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 IoMSPC 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: 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 consultation

1.2.2.1 Table 1.1 below provides a summary of the consultation undertaken by the Applicant with IoMSPC during the pre-application phase of the Morgan Generation Assets.

1.2.2.2 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with IoMSPC during the post-application phase of the Morgan Generation Assets.

Table 1.1: Summary of pre-application consultation with IoMSPC.

Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
Marine Navigation Engagement Forum (MNEF)				
10/11/2021	Meeting 1	IoMSPC	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

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Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
06/05/2022	Meeting 2	IoMSPC	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	IoMSPC	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	IoMSPC	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.
21/09/2023	Meeting 5	IoMSPC	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

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Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
08/02/2024	Meeting 6	IoMSPC	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	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • Project update • Key shipping and navigation impacts • Review of proposed approach to assessment.
04/04/2022	Meeting	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • To provide the evidential basis behind the current operations and constraints of ferry operations in order to inform the NRA and EIA.
01/06/2022	Letter	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • Letter to provide and update on the project
17/08/2022-19/08/2022	Navigation Simulations	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • PEIR stage bridge navigation simulations.
10/10/2022-11/10/2022	Hazard workshop	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • Morgan Generation Assets Hazard Workshop.
13/09/2023-14/09/2023	Navigation Simulations	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • Environmental Statement stage bridge navigation simulations.
28/09/2023-29/09/2023	Hazard workshop	IoMSPC	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.
11/12/2023	Meeting	IoMSPC	Non-statutory	<ul style="list-style-type: none"> • To provide an update following the Hazard workshops

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Table 1.2: Summary of post-application consultation with IoMSPC

Date	Form of consultation	Stakeholder	Statutory or non-statutory engagement	Summary of consultation
14/06/2024	Relevant representation	IoMSPC	Statutory	Relevant representations of IoMSPC.
24/06/2024	Meeting	IoMSPC	Non-statutory	Review of residual concerns.
05/09/2024	Meeting	IoMSPC	Non-statutory	Initial discussion on SoCG content and scope.
20/09/2024	Meeting	IoMSPC	Non-statutory	Discussion on SoCG.

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1.3 Agreement log

1.3.1 Overview

1.3.1.1 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 1.3 below.

Table 1.3: 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.

1.3.1.2 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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1.3.2 Shipping and navigation

1.3.2.1 Table 1.4 sets out the level of agreement between the parties for each relevant component of the application in relation to shipping and navigation.

Table 1.4: Agreement Log between the parties on shipping and navigation

Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
Environmental Risk Assessment (EIA) and Navigational Risk Assessment (NRA)				
IoMSPC.EIA.1	Consultation	The Applicant has undertaken adequate consultation with IoMSPC on potential impacts on shipping and navigation.	Agreed in meeting 05/09/24	Agreed
IoMSPC.EIA.2	Baseline environment	The baseline activity for shipping and navigation has been appropriately characterised and appropriate data has been used to inform the assessment.	Agreed in meeting 05/09/24	Agreed
IoMSPC.EIA.3	Assessment methodology	The assessment methodology for shipping and navigation is appropriate (including the potential effects and interpretation of impact and levels of significance, as well as the relevant cumulative projects). The hazards and impacts identified are relevant to the Morgan Generation Assets.	Agreed in meeting 05/09/24	Agreed
IoMSPC.EIA.4	Compliance with MGN654	The Applicant has undertaken the assessment in accordance with MGN654. This includes appropriate navigation simulations, an adequate Hazard Workshop allowing stakeholder input into the risk assessment, both of which are reflected within the Volume 4, Annex 7.1: Navigational Risk Assessment and CRNRA (APP-060) conclusions.	Agreed in meeting 05/09/24	Agreed

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Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
Safety of Navigation				
IoMSPC.SN.1	Safe routes for shipping	<p>The passage between Morgan Array Area and Walney Offshore Wind Farms (with a width of 4.1 nm to 5.3 nm) and Mona and Morgan (6 nm) is acceptable in most weather conditions and credible traffic situations to ensure safe action can be taken to maintain CPA of >1 nm from other vessels structures (as demonstrated during the navigation simulations with IoMSPC in September 2023).</p> <p>Therefore, and as consensus reached amongst participants at the Hazard Workshop held in Liverpool in September 2023 with IoMSPC representation, all unacceptable hazards had been reduced to Medium Risk and that further mitigation discussed (such as introducing traffic lanes) would be disproportionate to the level of risk and therefore could be concluded to be ALARP.</p>	In typical weather, safe routes for shipping are possible.	Ongoing point of discussion
IoMSPC.SN.2		<p>In adverse weather, it may not be safe or prudent for a vessel to proceed between Morgan Array Area and Walney Offshore Wind Farms or Mona and Morecambe Array Areas, due to the potential for adverse vessel motions which could detrimentally affect passenger comfort, personnel safety and cargo security. Therefore, masters may choose to take a longer passage around the offshore wind farms which would incur increased delays and operational impacts to IoMSPC.</p>	In bad weather safe routes for shipping are not achieved due to poor visibility and presence of existing offshore rigs	

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Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SN.3		<p>When considering all projects, including the pre-application Moor Vannin project, the sea room between the Morgan Array Area and Moor Vannin Scoping boundary is insufficient, leading to unacceptable allision and collision risk hazards as assessed within the CRNRA Appendix D.</p>	<p>2.7 nm corridor between Morgan Generation Assets and Moor Vannin scoping boundary is not acceptable.</p> <p>A gap either side of a single vessel passing centrally between the array areas is 1.35nm. A 'C' distance of 1.35nm as per MGN654 Annex 2 corresponds to a MEDIUM risk where compliance with the COLREGS may be challenging as well as likely S-Band radar/ARPA interference. This situation is not considered safe nor acceptable by IOMSPC for safe navigation of passenger ships, especially high-speed passenger craft.</p> <p>In addition, where two ships pass one another in a gap of 2.7nm a risk of LOW cannot be achieved. The following risk factors will be encountered:</p> <p>Vessel passing distance >0.7nm – the risk is HIGH with the windfarms.</p> <p>Vessel passing distance <0.7nm – the risk is MEDIUM with the windfarms.</p> <p>Such a passing distances may not be considered safe by ship Masters, particularly high-speed craft at full speed, eg 35kts with 900 passengers on board. Safety measures such as considerable speed reduction may have to be implemented leading to schedule delays.</p> <p>No regulatory routeing measures nor traffic control measures are in place nor proposed therefore a risk of HIGH or MEDIUM cannot be considered as "tolerable with ALARP measures" implemented.</p> <p>The IOMSPC opines for conventional passenger ferries and high speed passenger craft the risk for Isle of Man lifeline passenger ships passing other vessels within the bottleneck area between the proposed Moor Vannin and Morgan array areas should be LOW (MGN 654 Annex 2) for x2 vessels while maintaining a safe passing distance.</p>	Agreed

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Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SN.4	Traffic separation schemes	The Morgan Generation Assets would not interfere with traffic separation schemes (TSS), as the TSS Liverpool Bay and TSS Off Skerries are more than 20nm away.	Agreed in meeting 05/09/24	Agreed
Search and Rescue				
IoMSPC.SAR.1	Post consent plans	<p>The likelihood of requiring SAR activities within the Morgan Generation Assets is shown to be low through the NRA, and the risks of collision and allision are assessed as Medium Risk – Tolerable if ALARP.</p> <p>The Morgan Generation Assets layout will be designed to facilitate safe and effective SAR by vessels or helicopters. The NRA (APP-060) and chapter (APP-025) concluded that the impact on SAR as a result of the Morgan Array Area was minor due to embedded mitigations consistent with MGN654 Annex 5 but particularly:</p> <ul style="list-style-type: none"> • Development of ERCoP with MCA. • Two lines of orientation. • >1,400m between WTGs/OSPs. <p>Detailed SAR plans will not be developed until post-consent, as the layout and construction methods has not yet been determined. Therefore, the Applicant will not be in position to commence works until the SAR plan has been approved by the MCA (who will only do so once they are confident that the final design ensures risk to SAR operations are acceptable).</p> <p>These elements are secured within the draft Development Consent Order (AS-003) and deemed marine licences in the relevant conditions, such as Condition 25 for Offshore Safety Management.</p>	IoMSPC cannot comment on SAR until plans have been confirmed.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.SAR.2	Effects on Radar	<p>Section 1.8.12 of the NRA (APP-060) notes that adverse effects on radar can be experienced for vessels passing close to OWFs, which masters routinely experience and will be familiar with. The NRA concludes that the spacing between turbines is greater for the Morgan Generation Assets compared to existing Irish Sea projects and therefore there will be greater clarity in terms of radar detection between WTGs than that already experienced.</p> <p>The Applicant is aware that the Millom West platform is now hydrocarbon free and the decommissioning programme for Millom West is anticipated to be completed before the installation of the wind turbine generators on the foundations.</p>	<p>IoMSPC understand that X-band radar can be used but believe there may be limitations for S-band within close proximity of wind farm arrays.</p> <p>Risk with 2 nm passing distance in adverse weather/reduced visibility and possibility of radar interference.</p> <p>Agreed in meeting 20/09/2024 on the basis that Millom West has been decommissioned.</p>	Agreed
Operational Impacts to IoMSPC				
IoMSPC.OI.1	Morgan Array Area (in isolation)	The Morgan Generation Assets could have potential significant effects on lifeline ferry services due to adverse weather routing for IoMSPC route between Heysham and Douglas.	<p>Further discussion is needed with the Applicant on the residual impact.</p> <p>IoMSPC agrees with this statement</p>	Agreed
IoMSPC.OI.2	Mitigation (in isolation)	<p>With regards to adverse weather routing, the parties are engaging on the nature of the solution required to deal with the residual moderate effect for the high speed ferry route between Heysham and Douglas in adverse weather conditions.</p> <p>The Applicant will keep the ExA informed on the progress of these discussions throughout the examination.</p>	Agreed in meeting 20/09/2024. Weather may increase the likelihood of cancellation.	Agreed
IoMSPC.OI.3	Assessment of the effects from the Morgan Generation Assets cumulatively (excluding Moir Vannin Offshore Wind Farm Scoping Boundary) (CRNRA)	The Morgan Generation Assets in combination with cumulative projects (excluding Moir Vannin Scoping Boundary) could have potential significant effects due to adverse weather routing for IoMSPC between Liverpool and Douglas and Heysham and Douglas.	IoMSPC agrees with this statement	Agreed

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Reference Number	Discussion point	Applicant's Position	IoMSPC Position	Status
IoMSPC.OI.4	Mitigation (cumulative excluding Moir Vannin Scoping Boundary)	With regards to the cumulative impact of adverse weather routing, the parties are engaging on the nature of the solution required to deal with the residual moderate adverse effects. The Application will keep the ExA informed on the status of these discussions throughout the Examination.	IoMSPC agrees with this statement	Agreed
IoMSPC.OI.5	Assessment of the effects from the Morgan Generation Assets cumulatively (including Moir Vannin Offshore Wind Farm Scoping Boundary) (CRNRA)	The Morgan Generation Assets in combination with cumulative projects (including Moir Vannin Scoping Boundary) could have potential significant effects on lifeline ferry services, including the Isle of Man Steam Packet Company routes between Heysham and Douglas and Liverpool and Douglas.	IoMSPC agrees with this statement	Agreed
IoMSPC.OI.6	Mitigation (cumulative including Moir Vannin Scoping Boundary) (CRNRA)	The Applicant has dealt with those projects for which it has sufficient information to mitigate or find solutions to offset effects. The Applicant has considered the pre-application Moir Vannin scoping boundary as far as reasonably practicable within its assessments, but it is not appropriate for the Applicant to propose any further mitigation or solutions regarding the potential future Moir Vannin project.	2.7 nm corridor between Morgan Generation Assets and Moir Vannin scoping boundary is not acceptable.	Ongoing point of discussion