

1. Purpose of this document

- 1.1 The Examining Authority (“ExA”) issued its Second Written Questions to the Applicant and other Interested Parties on 19 December 2024 **[PD-011]** (“ExQ2”). Stena Line Limited (“Stena”) has responded to those questions directed to it and such other questions as may be relevant in the sections below.
- 1.2 A glossary of terms and list of acronyms can be found in Section 5.
- 1.3 Each question has a unique topic prefix identifier (capital letters), a reference number which starts with 2 (indicating that it is from ExQ2) and then a question number.
- 1.4 Column 4 of the Tables below provides Stena Line’s response to each relevant question. Where a question has been addressed through the making of a DL5 submission, a cross-reference to the relevant DL5 submission is provided in the appropriate Table.

2. Cross-Topic, General and Miscellaneous Questions (GEN)

ExQ2	Question to:	Question	Stena Line's Response
GEN 2.3	Applicant Interested Parties	<p>National Policy, Guidance and Legislation</p> <p>The Applicant and Interested Parties are asked to provide comment on further updates or changes to UK and Isle of Man Government legislation, policy or guidance relevant to the determination of this application that have been issued since submission of the application.</p> <p>Provide a summary of the implications, if any, for the Examination.</p> <p>Note: such updates include but are not limited to the National Planning Policy Framework published on 12 December 2024, the Clean Power 2030 Action Plan published on 13 December 2024, and other recently published Ministerial statements and policy papers.</p>	<p>Stena has no comments to make at this stage with regard to current updates or changes to policy, legislation or guidance issued since submission of the application as far as navigational matters are concerned.</p> <p>In the event, however, that any other parties raise comments in respect of current made changes to policy, legislation or guidance which might have a bearing upon Stena's interests, Stena would wish to reserve the right to provide any additional comments as may be relevant at DL6.</p> <p>For the assistance of the ExA, however, it should be noted that certain changes in the law are anticipated in the not too distant future which will impact on Stena's operations. These changes include:</p> <p>The UK ETS - Additional costs for Stena will be brought about by the introduction of the UK's Emissions Trading Scheme ("the UK ETS"). It is anticipated that Stena will be expected to comply with the obligation under the UK ETS from 1 January 2026. It should be noted that in respect of maritime emissions, there will be no phase-in period and, therefore, full compliance (and consequently any associated costs) will commence from that date.</p> <p>The ExA should be aware that, as part of its sustainability policy, Stena Line is committed to building new fuel-efficient tonnage and to changing to new greener fuels</p>

ExQ2	Question to:	Question	Stena Line's Response
			<p>such as Methanol. We anticipate that this will be heavily negated by the construction and operation of the Morgan Project (both individually and in combination with the other windfarm projects that are proposed). We have calculated the magnitude of these costs in a framework document over the lifetime of the project. We will be seeking to share these with the Applicant for transparency purposes and will consider further if it is appropriate from a confidentiality perspective to share these with the ExA at a later date.</p> <p>In addition to this, the International Maritime Organization ("IMO") is due to consider the adoption of a new Emission Control Area ("ECA") in the Northeast Atlantic Ocean in its next session (being early 2025). This new ECA would join up with existing ECAs in the Atlantic Ocean, North Sea, Baltic Sea, Mediterranean Sea and Norwegian Sea. When adopted, the requirements of the Northeast Atlantic ECA will likely come into force in 2027. Once this is in force, all ships subject to the International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI which are operating in the North East Atlantic ECA will be required to use on-board fuel oils with a maximum sulphur content of 0.10% m/m in accordance with MARPOL Annex VI, regulation 14, or to use alternative emission reduction and control technologies to comply with the emission standard. The net effect will be an increase in fuel costs which will, of course, be magnified by any</p>

ExQ2	Question to:	Question	Stena Line's Response
			increase in distances between ports when compared with the current baseline.

3. Draft Development Consent Order (DCO)

ExQ2	Question to:	Question	Stena Line's Response
DCO 2.4	All Interested Parties	<p>Requirement 1: Time Limits – Commencement and Challenge Period (1)</p> <p>IPs are invited to comment on the Applicant's responses to ExQ1 DCO 1.4 and DCO 1.5 (pages 50-51 [REP3-006]), in seeking to justify the seven-year commencement period and the extension to the period should a legal challenge be submitted.</p>	<p>Stena does not object to the principle of an extension to the Project's commencement from five to seven years but does ask for confirmation that the Applicant has, in providing its response to ExQ1 DCO 1.4 (copied below) also considered the potential for cumulative/in combination effects arising in terms of navigational impacts. This is in the context of both the Morgan Project and the other offshore windfarm projects which may come forward. Stena's concern is that the extended period may create the potential for navigational impacts arising from the construction of the projects occurring simultaneously or overlapping – a scenario which would not have arisen if the period remained as originally envisaged, namely five years.</p> <p><i>ExQ1 DCO 1.4 - "The Applicant does not consider that a seven-year commencement period would change the accuracy of the information presented in the Environmental Statement. The potential for changes in the environmental baseline over time is one of the reasons that pre-commencement surveys are a standard requirement secured through conditions within a deemed marine licence for an offshore wind farm project. This is included within condition 27 of each deemed marine licence in schedules 3 and 4 of the draft DCO [REP1-021]. There is not considered to be a material difference between 5 years and 7 years with regards to the need for additional surveys."</i></p>

4. Shipping and Navigation (SN)

ExQ2	Question to:	Question	Stena Line's Response
SN 2.3	Isle of Man Territorial Sea Committee Moir Vannin Offshore Wind Farm Limited Stena Line UK Chamber of Shipping	<p>Design vessel length in relation to PIANC guidance for safe passage space</p> <p>The IPs listed are asked to comment on what would be a reasonable 'design vessel' length overall (LOA) to be applied in relation to the PIANC guidance on route width as discussed in [APP-060, Appendix E, Section 7.6] considering the vessels expected to transit the sea space between the Proposed Development and the proposed Moir Vannin OWF, either on passage to or from the Port of Douglas or on passage past the east and north of the Isle of Man</p>	<p>i) <i>Stena vessels</i> - The largest Stena Line vessels that are currently in service on the route that passes to the east and north of the Isle of Man are the <i>Stena Edda</i> and the <i>Stena Embla</i>. Both of these vessels are 215m in length whilst <i>Stena Forwarder</i> is 179 m in length.. As far as Stena is aware, these are currently the largest vessels used on this route.</p> <p>ii) <i>Prospect of larger vessels</i> - There is a strong likelihood that Stena will bring into service two <i>eFlexer</i> vessels on the Belfast – Liverpool route in order to allow for greater lane meterage requirements. These vessels are notably larger, with a length of 240m and will be transferred from the Baltic where they are currently in use.</p> <p>(iii) <i>Other vessels</i> – Stena currently operate the largest tonnage on the route.</p> <p>(iv) <i>Reasonable 'design vessel' length overall to be applied in relation to the PIANC guidance for the routes?</i> In order properly to account for the future redeployment of the <i>eFlexer</i> vessels,</p>

			<p>Stena considers that an appropriate design vessel length would be, as a minimum, 240m.</p> <p>In this context, Stena Line notes the following submission from the Applicant at [APP-060]:</p> <p><i>'All three routes comply with the 20-degree rule recommended by the MCAs MGN654 and the PIANC guidance for both 200 m and 300 m design vessels, given the volume of traffic. Whilst the average vessel size for all three routes is less than 200 m, some vessels up to 300 m do transit these routes'</i></p> <p>Stena would draw the ExA's attention to the fact that the '20-degree rule' as set out in MGN 654 is very much a minimum requirement. It would, therefore, be helpful if the Applicant could provide a greater layer of manoeuvrability.</p> <p>In addition, Stena Line is of the view that even the minimum 20-degree rule will in any case not be met, leading to non-compliance in each direction, when the Walney Extension – Morgan – Moor-Vannin channel is analysed collectively and in combination.</p> <p>Stena has provided a cumulative analysis of the 20-degree rule on this channel at Appendix 1 to this document, which shows that the Morgan</p>
--	--	--	--

			Project is not currently in compliance with the minimum PIANC guidance.
SN 2.4	Maritime and Coastguard Agency Moir Vannin Offshore Wind Farm Limited Stena Line UK Chamber of Shipping	<p>Precedent for restricted navigation corridors past OWFs</p> <p>The ExA invites comment from the listed IPs on the discussion of UK precedent for restricted channels between windfarms presented in [APP-060, Section 7.6 of Appendix E] as expanded in the Applicant's Annex 3.1 to responses to ISH2 Action Points [REP4-005] and invites suggestion of any other relevant precedent (whether or not flanked on both sides by offshore wind turbine arrays) of navigation route 'corridors' of restricted width, outwith ports and harbours.</p>	<p>Stena line operates two vessels on its Belfast to Heysham route. These vessels each operate a round trip between the two ports on a daily basis, year-round. This passage intersects with the West Duddon, Walney phase 1 & 2 and Walney Extension and the Ormond and Barrow windfarms. All of these windfarms, however, were constructed to either the North or South of the Stena vessels' normal course lines and as a consequence, no enforced deviation from the route by Stena's vessels was required.</p> <p>Furthermore, only the much smaller Ormond and Barrow windfarms lie to the north of this vessel route and as such create only a minimal channel effect (see Appendix 2). This in turn results in a minimal restriction to vessel masters from the perspective of reduced availability of sea room for altering course for other traffic or for reasons of weather.</p> <p>This is combined with minimal merchant traffic normally encountered on this route.</p> <p>As such, it will be appreciated that the vessel interaction with windfarms on the Belfast to Heysham route is not comparable in terms with</p>

			<p>the impact on routing and navigation that will be caused by the Morgan Project.</p>
<p>SN 2.7</p>	<p>Maritime and Coastguard Agency Stena Line UK Chamber of Shipping Any Other Interested Parties</p>	<p>Security for continuation of the Marine Navigation Engagement Forum The listed IPs are asked to confirm if they consider that adequate security for post-consent stakeholder engagement would be provided by Commitment Co72 in the Commitments Register [REP4-025] which commits to continued engagement of the Marine Navigation Engagement Forum (MNEF) post-consent, and if not, why not.</p>	<p>Stena is strongly of the view that there are a considerable number of navigational safety issues outstanding that are specific to Stena’s own interests, including (but not limited to): the introduction of potentially hazardous apparatus and infrastructure into the marine environment; potential commercial implications for Stena’s existing operations; and the potential need for any indemnities - for example, in respect of in-combination/cumulative impacts on navigation from the potential for simultaneous/overlapping construction of projects as a result of the 7 year commencement period (referred to in DCO 2.4 above).</p> <p>Because these matters relate directly to routes that are operated by Stena, it would not be appropriate for these matters to be dealt with by any parties other than Stena and the Applicant.</p> <p>In this context and in response to the question raised, the ExA should be aware that Stena is discussing a number of options with the Applicant about which the ExA will, if a short delay acceptable to the ExA, be informed no later DL 6. That response will include Stena’s views as to the</p>

			comfort and security of engagement that will be provided by the MNEF.
SN 2.9	Isle of Man Steam Packet Company Stena Line UK Chamber of Shipping	<p>Agreeing assessment of likely effects of ferry route deviations</p> <p>The listed IPs are asked to report briefly by D6 the best efforts they have made to agree with the Applicant an assessment of any likely significant social or economic effects and carbon emissions effects of the route deviation that would be necessitated by the presence of the proposed Morgan Generation Assets array alone, for each ferry route or routes which would be affected. It would be helpful to the ExA if such assessment were to be stated on a percentage change basis.</p>	Stena will provide a comprehensive response to this question as part of its D6 submissions
SN 2.11	Isle of Man Steam Packet Company Stena Line	<p>Mitigation for adverse commercial and carbon emissions effects of ferry deviations</p> <p>The IoMSPC and Stena Line are each asked to advise:</p> <ol style="list-style-type: none"> i. What mitigation it is seeking for adverse commercial and carbon emissions effects resulting from the need for deviated passages of its ferry services. ii. How would any such mitigation be allocated among the cumulative projects creating the need for deviation. <p>How should any such mitigation be secured via a DCO, if made.</p>	<p>Stena is engaged in discussions with the Applicant with regard to mitigation. This may be secured by a number of means all of which are currently the subject of the ongoing discussions – and may extend to securing some form of protection in the DCO itself.</p> <p>If acceptable to the ExA, however, due to the nature of the negotiations, Stena would prefer to delay its response to the three questions raised until DL 6?</p> <p>.</p>

5. Glossary and List of Acronyms

dDCO	Draft Development Consent Order
D6	Deadline 6
ExA	Examining Authority
ExQ2	Examining Authority's Second Written Questions

Appendix 1 - Analysis of the 20-degree rule from MGN654 as it applies to the Morgan – Moir Vannin – Walney Extension Channel

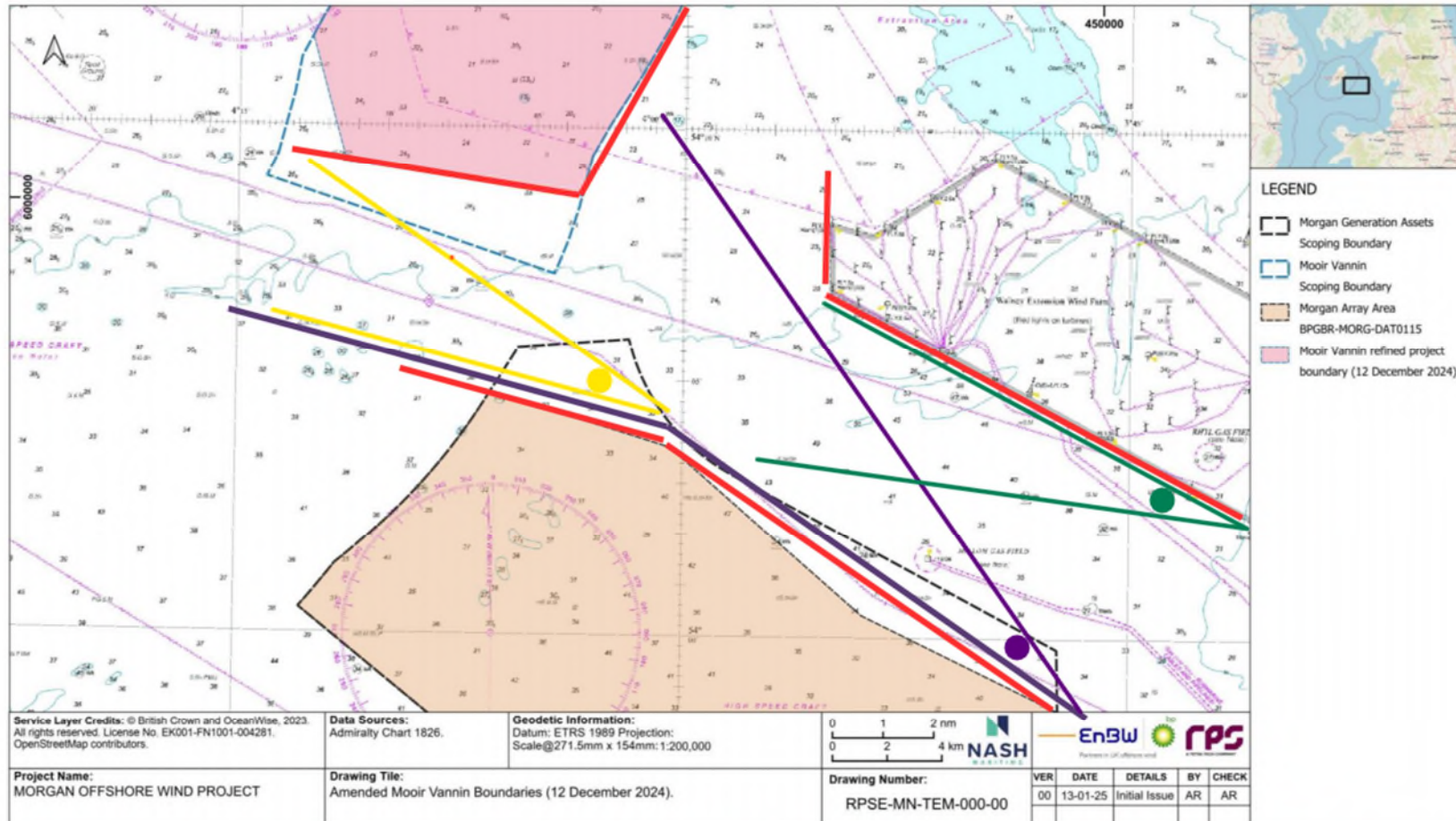


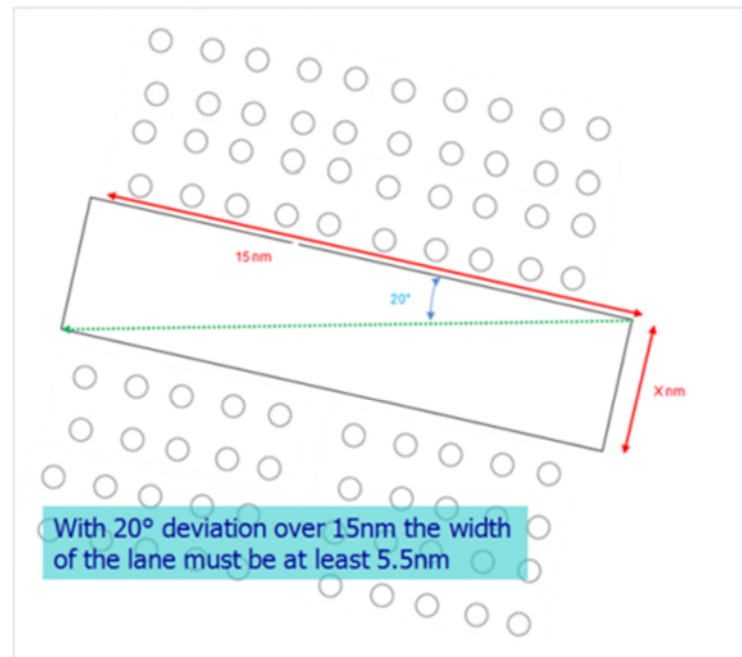
Figure 1: Boundaries of Morgan Generation Assets (Application Boundary) and Moir Vannin Offshore Wind Project (post-12 December 2024).

Extract from MGN 654 (M+F) Safety of Navigation: Offshore Renewable Energy Installations (OREIs) - Guidance on UK Navigational Practice, Safety and Emergency Response.

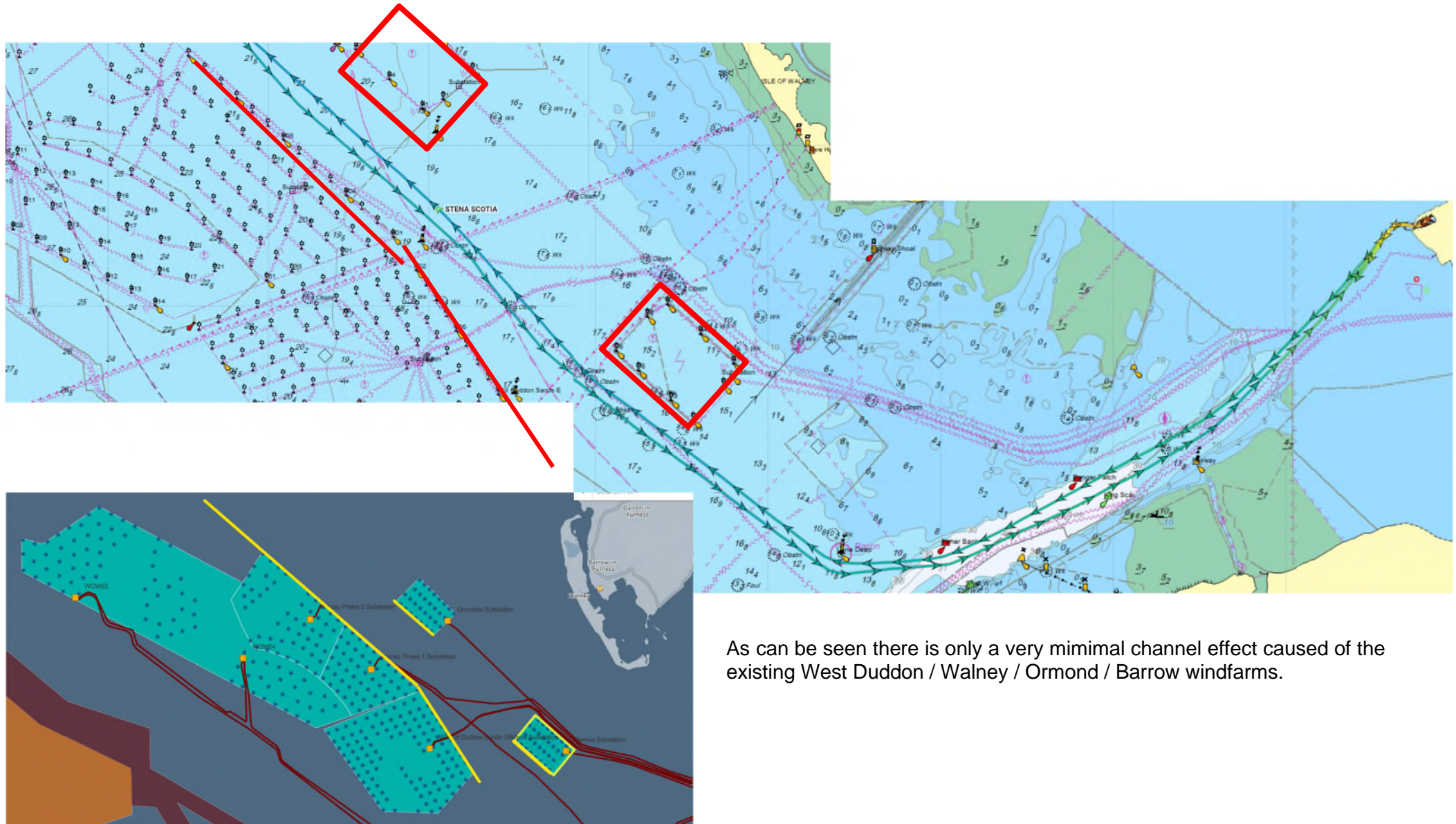
iii. Constraints of weather, sea and tidal conditions that may be expected in the location.

(1) Unlike inshore and estuary areas, when on passage in exposed sea areas, for example offshore in the North Sea, it will not always be possible to make good a planned course. Experience also shows that in heavy sea conditions it is much harder to turn the vessel around and may not be possible to achieve a dead stop and deviations from track are common. Therefore 20° or more, are common (as determined from the traffic assessment of the NRA) and must be considered in developing corridors through OREIs.

(2) For example:



Appendix 2 - Analysis of the channel effect of the existing West Duddon / Walney / Ormond / Barrow windfarms



As can be seen there is only a very minimal channel effect caused of the existing West Duddon / Walney / Ormond / Barrow windfarms.