

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Consultation report

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Image of an offshore wind farm

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Consultation Mailing Zone	A defined area where all addresses would be sent a postcard mailout as part of the consultation.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Morgan Offshore Wind Project: Generation Assets.
Evidence Plan Process (EPP)	The Evidence Plan Process (EPP) is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Morgan Generation Assets.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
Information to Support the Appropriate Assessment (ISAA)	A report setting out a study to consider whether the Morgan Generation Assets could have adverse effects, either alone or in combination with other plans or projects, on the integrity of designated European sites for which the potential for likely significant effects (LSE) has been previously established.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for 'deemed marine licences' as part of the DCO process.
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.

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Term	Meaning
Marine Conservation Zone (MCZ) Assessment	An assessment of the potential for the Morgan Generation Assets to affect the protected features of MCZs, and any ecological or geomorphological processes on which the protected feature is dependent on.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets, plus offshore and onshore transmission assets and associated activities.
Morecambe Offshore Windfarm: Generation Assets	The Morecambe Offshore Windfarm: Generation Assets is located in the east Irish Sea approximately 28.75 km (15.5nm) from the northwest coast of England (when measured from Mean High Water Springs (MHWS)). The anticipated nominal capacity of the Morecambe Offshore Windfarm: Generation Assets is 480 MW.
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 part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
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 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).
Morgan Offshore Wind Project: Generation Assets PEIR	The Morgan Generation Assets Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan Offshore Wind Project: Generation Assets.
Morgan Offshore Wind Project: Generation Assets Scoping Report	The Morgan Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan Offshore Wind Project: Generation Assets.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets. This includes the Offshore Substation Platforms (OSPs), interconnector cables, Morgan offshore booster station, offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure, such as circuit breaker infrastructure (as defined in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets PEIR).
Morgan Potential Array Area	The area that was presented in the Morgan Generation Assets PEIR as the area within which the wind turbines, foundations, inter-array cables, interconnector cables and offshore substation platforms (OSPs) forming the Morgan Generation Assets. This area was the boundary consulted on during statutory consultation and subsequently refined for the application for Development Consent.
National Policy Statement(s) (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.

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Term	Meaning
Net zero	A target of completely negating the amount of greenhouse gases produced by human activity either worldwide or by a country or organisation, to be achieved by reducing emissions and implementing methods of absorbing carbon dioxide from the atmosphere.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
Offshore Substation Platform (OSP)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore Wind Leasing Round 4	The Crown Estate (TCE) auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Planning Act 2008 (the 2008 Act)	Primary legislation establishing, inter alia, the Infrastructure Planning Commission and provisions about its functions and provisions about and matters ancillary to the authorisation of Nationally Significant Infrastructure Projects.
Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance)	The Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance) authored by the former Department of Communities and Local Government (DCLG) (now the Department of Levelling Up, Housing and Communities (DLUHC)) sets out the requirements and procedures for the pre-application process and consultation for major infrastructure project.
Pre-construction site investigation surveys	Pre-construction geophysical and/or geotechnical surveys undertaken offshore to inform, amongst other things, the final design of the Morgan Offshore Wind Project: Generation Assets.
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the Development Consent Order, once made.
Project Design Envelope (PDE)	The Project Design Envelope sets out the design assumptions and parameters from which the realistic MDSs are drawn for the Morgan Generation Assets Environmental Impact Assessment (EIA). This is also often referred to as the 'Rochdale Envelope' approach.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations)	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations), is a statutory instrument relating to Nationally Significant Infrastructure Projects (NSIPs).
The Infrastructure Planning (Environmental Impact Assessment)	The EIA Regulations 2017 transposed the EU system of environmental assessment into domestic law and the European Union (Withdrawal) Act 2018 retained these provisions at the end of the transition period. With the

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Term	Meaning
Regulations 2017 (EIA Regulations 2017)	repeal of the European Communities Act 1972 the government needs to secure powers in primary legislation if it is to repeal and replace the EU system. DLUHC is responsible for the EU derived environmental assessment regime throughout the planning system in England. This applies to projects consented under the Planning Act 2008 (i.e., the nationally significant infrastructure project (NSIP) regime).
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
The Secretary of State for Energy, Security and Net Zero	The decision maker with regards to the application for development consent for the Morgan Offshore Wind Project: Generation Assets.
Wind Turbines	The wind turbine generators, including the tower, nacelle and rotor.

Acronyms

Acronym	Description
ABP	Associated British Ports
AEoI	Adverse Effect on Integrity
AHEF	Archaeology and Heritage Engagement Forum
BEIS	Department for Business, Energy and Industrial Strategy
CEA	Cumulative Effect Assessment
Cefas	Centre for Environment, Fisheries and Aquaculture Science
CRNRA	Cumulative Regional Navigational Risk Assessment
cSAC	candidate Special Areas of Conservation
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
dDCO	Draft Development Consent Order
Defa	Department for Food and Agriculture
DESNZ	Department for Energy Security and Net Zero
DLUHC	Department for Levelling Up, Housing and Communities
dML	deemed Marine Licence
EA	Environment Agency
EDR	Effective Deterrent Range
EEA	European Economic Area
EIA	Environmental Impact Assessment
EMODnet	European Marine Observation and Data Network
EPP	Evidence Plan Process
EU	European Union

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Acronym	Description
EWG	Expert Working Group
GDPR	General Data Protection Regulations
GHG	Greenhouse Gas
HE	Historic England
HNDR	Holistic Network Design Review
HRA	Habitats Regulations Assessment
HSC	Historic Seascape Character
IEMA	Institute of Environmental Management and Assessment
IFP	Instrument Flight Procedures
IoM	Isle of Man
ISAA	Information to Support the Appropriate Assessment
JNCC	Joint Nature Conservation Committee
LEP	Local Enterprise Partnership
LoS	Line of Sight
LSE	Likely Significant Effects
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MMO	Marine Management Organisation
MNEF	Marine Navigation Engagement Forum
MOD	Ministry of Defence
MP	Member of Parliament
MS	Member of Senedd
MSA	Minimum Safety Altitude
NFFO	National Federation of Fisherman's Organisation
NGET	National Grid Electricity Transmission
NGESO	National Grid Electricity System Operator
NIFPO	Northern Ireland Fish Producer's Organisation
NPC	Non-prescribed consultee
NPS	National Policy Statement
NRA	Navigational Risk Assessment
NRW	Natural Resource Wales
NSIP	Nationally Significant Infrastructure Project
NTS	Non-Technical Summary

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Acronym	Description
NNWT	North West Wildlife Trust
Ofwat	The Water Services Regulatory Authority
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PAD	Protocol for Archaeological Discoveries
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
POI	Point of Interconnection
pSAC	possible Special Areas of Conservation
pSPA	Potential Special Protection Areas
PSR	Primary Surveillance Radar
PTS	Permanent Threshold Shift
PWIL	Person With an Interest in the Land
RCAHMW	Royal Commission on the Ancient Historical Monuments of Wales
RNLI	Royal National Lifeboat Institution
RSPB	Royal Society for the Protection of Birds
SAR	Search and Rescue
SLVIA	Seascape, Landscape and Visual Impact Assessment
SNCB	Statutory Nature Conservation Bodies
SoCC	Statement of Community Consultation
SCGs	Statements of Common Ground
SPA	Special Protection Areas
SFF	Scottish Fisherman's Federation
SSC	Suspended Sediment Concentration
SWFPO	South Western Fish Producers Organisation
TAEZ	Temporary Archaeology Exclusion Zone
TCE	The Crown Estate
TEP	Technical Engagement Plan
THLS	Trinity House Lighthouse Services
TSC	Territorial Seas Committee
TTS	Temporary Threshold Shift
TWT	The Wildlife Trusts
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
VMS	Vessel Monitoring System

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Acronym	Description
WFA	Welsh Fishermans Association
WTW	Wildlife Trust Wales
ZTV	Zone of Theoretical Visibility

Units

Unit	Description
%	Percentage
Kv	Kilovolt
KW	Kilowatt
MW	Megawatt
GW	Gigawatt
kJ	Kilojoule
dB	Decibel
m	Metre
m ³	Cubic metre
km	Kilometre
km ²	Square kilometres
nm	Nautical Miles
LAT	Latitude

1 EXECUTIVE SUMMARY

- 1.1.1.1 This Consultation report has been prepared by Morgan Offshore Wind Limited (the Applicant), in support of its application for a Development Consent Order (DCO) for the Morgan Offshore Wind Project: Generation Assets (hereafter Morgan Generation Assets).
- 1.1.1.2 Morgan Offshore Wind Limited is a joint venture between two leading energy companies (bp and EnBW). The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The project includes offshore elements to generate electricity. The Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham.
- 1.1.1.3 This Consultation report solely relates to the Morgan Generation Assets.
- 1.1.1.4 As the Morgan Generation Assets is an offshore generating station with a capacity greater than 100 MW, located wholly in English waters, it is a Nationally Significant Infrastructure Project (NSIP) as defined by section 15(3) of the Planning Act 2008 (the 2008 Act).
- 1.1.1.5 From the outset, the Applicant has been committed to a consultation process underpinned by an ethos of being open, transparent, constructive, collaborative and solutions focused. Consulting with people and organisations which may be affected by the development is an important part of the DCO planning process and all consultation activity was designed to be accessible to all.
- 1.1.1.6 The Consultation Report has been prepared in accordance with the 2008 Act and presents the consultation activities conducted during the pre-application phase of the Morgan Generation Assets. It details all aspects of the consultation process, covering both non-statutory and statutory stages, as prescribed by sections 42, 46, 47, 48 and 49 of the 2008 Act:
- Section 42: In accordance with its duty to consult under section 42 of the 2008 Act, the Applicant consulted with prescribed bodies, The Marine Management Organisation and The Crown Estate (TCE), as landowners, to ensure that they had an opportunity to review and comment on the proposals. As the Morgan Generation Assets DCO application boundary is located wholly within the marine environment, there are no defined relevant local authorities under section 42(1)(b). Despite this the Applicant identified local authorities and consulted with them (section 2.1.1.3 outlines how these authorities were identified). The identification of these authorities is set out at section 5.3 and the full list of prescribed consultees can be viewed at Appendix D.16. Section 5 of this report explains in detail how the Applicant consulted with those groups and individuals.
 - Section 46: As required by section 46 of the 2008 Act, the Applicant notified the Secretary of State of the proposed application at the same time as section 42 consultees (see section 5.3.8)
 - Section 47: As the Morgan Generation Assets DCO application boundary is located wholly within the marine environment, there is no requirement to consult under section 47, and hence no requirement to prepare a Statement of Community Consultation (SoCC) under this element of the 2008 Act. Notwithstanding this the Applicant strongly believes that consultation is an integral part of the development of the project proposal. As such, a SoCC was prepared voluntarily in line with principles of the 2008 Act (Appendix D.1), and

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the Planning Inspectorate's pre-application guidance (March 2015) (DCLG Guidance). It outlined the Applicant's proposed community consultation approach. The approach outlined in the SoCC was then implemented, as outlined in section 5 of this report.

- Section 48: Section 48 of the 2008 Act requires the Applicant to publicise a proposed application at the pre-application stage, in the prescribed manner, and to include a deadline for receipt of responses. The Applicant publicised the application in the prescribed manner. All publicity methods used by the Applicant are outlined in section 5.6 of this report.
- Section 49: In addition to carrying out its consultation activities as prescribed by sections 42, 47 and 48 of the 2008 Act as detailed above, section 49 requires that the Consultation report should give details of the account taken of any responses provided to its consultation activities. This report provides this information in section 5.8.

1.1.1.7 As the basis for its statutory consultation (19 April to 04 June 2023), the Applicant prepared a Preliminary Environmental Information Report (PEIR) and provided supporting documents to assist consultees in developing an informed perspective on the potential environmental impacts of the project. A non-technical summary (NTS) of the PEIR was also made available. The Applicant reviewed all feedback on the PEIR and considered opportunities to incorporate any information or comments received into the final design presented as part of the Environmental Statement at application (Document Reference F1 – F4).

1.1.1.8 This Consultation report presents and summarises feedback from stakeholders throughout all stages of consultation and explains how the Applicant has given regard to this within its decision-making. Additionally, the report sets out the ongoing community and stakeholder engagement activity that continues beyond the feedback consideration cut-off date. In summary, this Consultation report details how the Applicant engaged with consultees at each of the following stages of the project's development:

- Pre-scoping: the initial period of engagement to introduce the project and prepare for scoping
- Scoping: the process of preparing a scoping report, submitting this report to the Planning Inspectorate and receiving a Scoping Opinion from the Department of Business, Energy and Industrial Strategy (BEIS)
- Post-scoping and pre-PEIR: discussion of scoping responses and initial engagement with the local community, including non-statutory consultation, consultation on the draft SoCC, preparation for statutory consultation and PEIR publication, and seeking feedback on how the Applicant intended to engage with stakeholders
- Statutory consultation: the statutory consultation period as outlined in the 2008 Act including the additional statutory consultation that was undertaken
- Post-PEIR and pre-application engagement: the review of statutory consultation responses with key stakeholders, post-statutory consultation engagement with affected stakeholders to inform them of design changes and pre-application engagement with relevant stakeholders to discuss outstanding issues and next steps.

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- 1.1.1.9 The project refinements made as a result of feedback received during the statutory consultation on the PEIR are set out in detail in section 6 of this report and can be summarised as follows:
- The extent of the Morgan Array Area has been reduced
 - The maximum number of wind turbines has been reduced and the smallest wind turbine removed from the project envelope
 - The use of monopile foundations has been removed as a wind turbine foundation option in the design envelope
 - The minimum separation distance between wind turbines and Offshore Substation Platforms (OSPs) has increased
 - The Applicant has committed to an area free of surface infrastructure within the Morgan Array Area to promote co-existence with fishing activities
 - The Applicant has committed to two lines of orientation in the Morgan Array Area to facilitate safety of marine navigation, fishing activities and search and rescue (SAR).
- 1.1.1.10 The Applicant has ensured that this document aligns with the recommended structure and content for a comprehensive consultation report and provides a detailed account of all pre-application stage consultation and stakeholder engagement activities related to the Morgan Generation Assets.
- 1.1.1.11 This Consultation report has been prepared in accordance with the Planning Inspectorate's guidelines and those set out by the former Department of Communities and Local Government (DCLG) (now the Department for Levelling Up, Housing and Communities (DLUHC)); Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance).

2 INTRODUCTION

2.1 Overview and purpose of the Consultation report

2.1.1.1 This Consultation report has been written on behalf of Morgan Offshore Wind Limited (the Applicant), in support of the application for a DCO under the Planning Act 2008 (the 2008 Act) for the Morgan Generation Assets.

2.1.1.2 For Morgan Generation Assets, the DCO application boundary is located wholly within the marine environment, with no onshore infrastructure. As such there are two aspects of the 2008 Act which are not directly applicable:

- Firstly, section 43 of the 2008 Act defines the relevant local authority in accordance with section 42(1)(b), however as there is no onshore infrastructure there is no defined relevant local authority applicable to the Morgan Generation Assets
- Secondly, section 47 of the 2008 Act places a duty on the Applicant to consult with '*people living in the vicinity of the land*'. There is therefore no provision in the 2008 Act for the project to prepare and consult on a SoCC.

2.1.1.3 Notwithstanding this, the Applicant strongly believes that consultation is an integral part of the development of the project proposal and voluntarily conducted statutory consultation in accordance with the principles of both section 42(1)(b) and 47 of the 2008 Act, in the following ways:

- Despite not falling within the definitions prescribed under section 43, in line with Advice Note Three, paragraph C7.1 (see section 3.2) the Applicant identified and consulted with local authorities which fell into 2 categories, the host authorities identified under S42(1)(b) for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (see section 1) and/or those potentially affected visually by the Morgan Generation Assets (see section 5.3 for further details)
- The Applicant voluntarily prepared a SoCC in accordance with the principles of section 47 of the 2008 Act as it understands that consulting with people who may be affected by Morgan Generation Assets is an important part of the DCO planning process (see section 5.2 for further details).

2.1.1.4 This voluntary consultation under section 47 of the 2008 Act was undertaken as part of the statutory consultation that the Applicant was required to undertake under section 42(1)(a) of the 2008 Act. The Applicant made no distinction between different stakeholders and the information made available to them at this stage of pre-application consultation. As such the consultation undertaken voluntarily and statutorily is fully reported in the statutory consultation section of the report (section 5) and referred to as statutory consultation hereafter.

2.1.1.5 This report provides a summary of consultation activity undertaken as part of the pre-application phase of the Morgan Generation Assets and describes the consultation process that the Applicant followed both in terms of the non-statutory (section 2.5.1.2 for more information), voluntary and statutory consultation and publicity phases, as required under sections 42, 47 and 48 of the 2008 Act. It outlines the feedback received and explains how the feedback received was taken into account by the Applicant (as required under section 49 of the Act).

2.1.1.6 Additionally, the report contains details of ongoing stakeholder engagement activities that have been conducted, and are continuing, throughout the development of the

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Morgan Generation Assets. All feedback received has been incorporated as close to the submission of the DCO application as possible.

- 2.1.1.7 This Consultation report has been prepared following the guidance provided by the Planning Inspectorate in Advice Note Fourteen: Compiling the Consultation report (February 2021, Version 3), which offers developers guidance on the structure and content of the Consultation report, and Advice Note Six: Preparation and submission of application documents (Version 11).
- 2.1.1.8 Consistent with the recommendations presented in Advice Note Fourteen, this document offers a comprehensive summary of all consultation and stakeholder engagement undertaken at the pre-application stage in relation to the Morgan Generation Assets.
- 2.1.1.9 The report also adheres to guidelines set out by the former DCLG (now the DLUHC); Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance), for major infrastructure projects. In particular, paragraph 80 stipulates that the Consultation report should:
- Provide a general description of the consultation process undertaken, which can helpfully include a timeline (see section 2.5)
 - Set out specifically what the applicant has done in compliance with the requirements of the 2008 Act, relevant secondary legislation, this guidance, and any relevant policies, guidance or advice published by Government or the Planning Inspectorate (see Appendix B.1)
 - Set out how the applicant has taken account of any response to consultation with local authorities on what should be in the Applicant's statement of community consultation (see section 5.2)
 - Set out a summary of relevant responses to consultation (but not a complete list of responses) (see section 5.8)
 - Provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed (see section 5.8)
 - Be expressed in terms sufficient to enable the Secretary of State to understand fully how the consultation process has been undertaken and significant effects addressed.
- 2.1.1.10 More detail on how this report gives regard to the relevant legislation, guidance, and advice is given in section 3 of this report.

2.2 About the Applicant

- 2.2.1.1 Morgan Offshore Wind Limited (the Applicant), a joint venture between two leading energy companies (bp and EnBW). These two companies are working together as partners to deliver offshore wind projects in both Offshore Wind Leasing Round 4 and ScotWind Leasing.

bp

- 2.2.1.2 bp has set out an ambition to be a net-zero company by 2050 or sooner, and to help the world get to net zero. bp has set out a strategy for delivering this ambition. bp is focused on delivering its transformation into an integrated energy company, helping to provide the energy the world needs today, and investing in the energy transition.

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- 2.2.1.3 In January 2021, bp and Equinor agreed to develop together two major lease areas located in federal waters off New York and Massachusetts, Empire Wind and Beacon Wind. In January 2024, bp and Equinor announced that bp will take ownership of Equinor's 50% stake in the Beacon Wind US offshore wind projects and Equinor will take ownership of bp's 50% stake in the Empire Wind US offshore wind projects. Subject to closing the transaction, bp will work independently to develop Beacon 1 and Beacon 2 on a wholly owned basis. Beacon Wind 1 and 2 comprise a combined potential generative capacity in excess of approximately 2.5 GW. In the UK, bp and partner EnBW are leading the development of the Morgan and Mona offshore wind projects in the Irish Sea and the Morven offshore wind project in the North Sea. These projects have a combined potential generating capacity of 5.9 GW, sufficient to power the equivalent of around 6 million UK households. In early 2023, bp was successful in its bid to develop its first floating offshore wind demonstration project offshore Aberdeenshire.
- 2.2.1.4 In July 2023, bp was successful in its bids for two sites offshore in Germany with a potential generating capacity of 4 GW. bp has formed a strategic partnership with Japanese conglomerate Marubeni to explore offshore wind opportunities in Japan. bp has also formed a JV with Norway's Deep Wind Offshore, a part of which saw bp acquire a 55% stake in the company's early-stage offshore wind portfolio, which includes four projects across the Korean Peninsula.
- 2.2.1.5 bp already has an onshore wind business in the US with a gross generating capacity of 1,700 MW, operating nine wind assets across the country. On 30 November 2023, bp announced that it agreed to acquire the 50.03% interest it does not already own in Lightsource bp, a global leader in utility-scale solar. The deal is expected to complete in the second half of 2024, subject to regulatory approvals.

EnBW

- 2.2.1.6 EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 27,000 employees. EnBW aims to strengthen its position as a sustainable and innovative infrastructure partner for customers, citizens and local authorities to an even greater extent. The repositioning of EnBW with a focus on renewable energies and smart infrastructure solutions is a key component of its strategy.
- 2.2.1.7 With a focus on renewable energy and smart infrastructure solutions, EnBW's objective is for half of the electricity it supplies to be from renewable sources by the end of 2025. This is already having a noticeable effect on the reduction of CO₂ emissions, which EnBW aims to halve by 2030 and to be climate neutral by 2035. EnBW has been involved in the operation of hydro power plants in the Black Forest for more than 100 years, and has a large and continuously growing number of onshore wind farms and solar photovoltaics in Germany, France and Sweden. In addition, EnBW developed, constructed and operates four offshore wind farms in Germany (EnBW Baltic 1, Baltic 2, Hohe See and Albatros) with a total installed capacity of 945 MW, commissioned between 2011 and 2020. A further 900 MW offshore wind farm, He Dreiht, is currently under development in Germany.

2.3 Project overview

- 2.3.1.1 The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The project includes the offshore elements to generate electricity from wind.

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- 2.3.1.2 The Morgan Array Area will have up to 96 offshore wind turbines in total in an area of approximately 280 km² located 22.22 km (12 nm) from the Isle of Man coastline, 37.13 km (20.1 nm) from the northwest coast of England and 58.5 km (31.6 nm) from the Welsh coastline (Anglesey) (when measured from Mean High Water Springs (MHWS)). The Morgan Array Area is located wholly within English offshore waters.
- 2.3.1.3 The key components of the Morgan Generation Assets include:
- Offshore wind turbines
 - High Voltage Alternating Current transmission system including:
 - OSPs
 - Offshore interconnector cable(s)
 - Foundations (for wind turbines and OSPs)
 - Scour protection
 - Cable protection
 - Inter-array cables linking the individual wind turbines to the OSPs.
- 2.3.1.4 As the Morgan Generation Assets is an offshore generating station with a capacity of greater than 100 MW located wholly in English waters, it is a NSIP as defined by section 15(3) of the 2008 Act. As such, a DCO from the Secretary of State for the Department for Energy Security and Net Zero (DESNZ) is required for the construction, operation and decommissioning of the Morgan Generation Assets.
- 2.3.1.5 Full details of the Morgan Generation Assets design are provided within Volume 1, Chapter 3: Project Description of the Environmental Statement (Document Reference F1.3).

2.4 Project background

- 2.4.1.1 The Morgan Offshore Wind Project has been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify and wherever possible facilitate collaborative approach to offshore wind projects connecting to the UK National Grid. Under the OTNR, the National Grid Electricity System Operator (NGESO) is responsible for assessing options to improve the coordination of offshore wind generation connections and transmission networks and has undertaken a Holistic Network Design Review (HNDR). In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022).
- 2.4.1.2 A key output of the HNDR process was the conclusion that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. Although the projects are being developed by separate companies, which means it is not feasible for all aspects of both projects to be consented under a single application, the Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham.
- 2.4.1.3 Given the grid connection arrangements, the consenting strategy for the Morgan Generation Assets and the Morecambe Offshore Windfarm is as follows:

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- A stand-alone DCO application to consent the construction, operations and maintenance, and decommissioning of the generation assets of the Morgan Offshore Wind Project.
- A stand-alone DCO application to consent the construction, operations and maintenance, and decommissioning of the generation assets of the Morecambe Offshore Windfarm
- A separate application to consent the construction, operations and maintenance and decommissioning of the transmission assets required to enable the export of electricity from both the Morgan Generation Assets and the Morecambe Offshore Windfarm to the National Grid entry point at Penwortham.

2.4.1.4 In order to achieve this, the Applicant, together with the applicant for the Morecambe Generation Assets, has requested, and been granted, a direction from the Secretary of State under section 35 of the 2008 Act to pursue a transmission assets consent (covering both projects' offshore and onshore transmission infrastructure) through the DCO process.

2.5 The consultation process

2.5.1.1 The phases of consultation undertaken by the Applicant are outlined in Figure 2.1 below.

2.5.1.2 To ensure early engagement with communities, the Applicant carried out non-statutory consultation between 02 November and 13 December 2022 alongside Morecambe Generation Assets and Morgan and Morecambe Offshore Wind Farms: Transmission Assets, where search areas for the offshore transmission infrastructure, the onshore cable routes and substations were presented for the projects.

2.5.1.3 The Applicant's second consultation - its statutory consultation - ran from 19 April to 04 June 2023 and was based on the PEIR (Morgan Offshore Wind Ltd, 2023). The PEIR set out the findings of the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) that were known up to that point and the feedback received during the non-statutory phase of consultation. The Applicant's approach to statutory consultation is explained in more detail in section 5 of this report.

2.5.1.4 Following statutory consultation, the Applicant reviewed all feedback received and sought further engagement with technical stakeholders as part of the ongoing EIA and HRA processes. Following this review of feedback, ongoing surveys, assessments and technical studies, the Applicant implemented design changes and mitigatory measures. These refinements were announced in September 2023 (see section 6 of this report).

2.5.1.5 Additional targeted statutory consultation was also undertaken and is detailed within section 5.4. This includes further details on the dates of this consultation and those involved.

2.5.1.6 Feedback received from all phases of activity has been considered in the preparation of the final application. Figure 2.1 below provides a summary of the approach taken to consultation.

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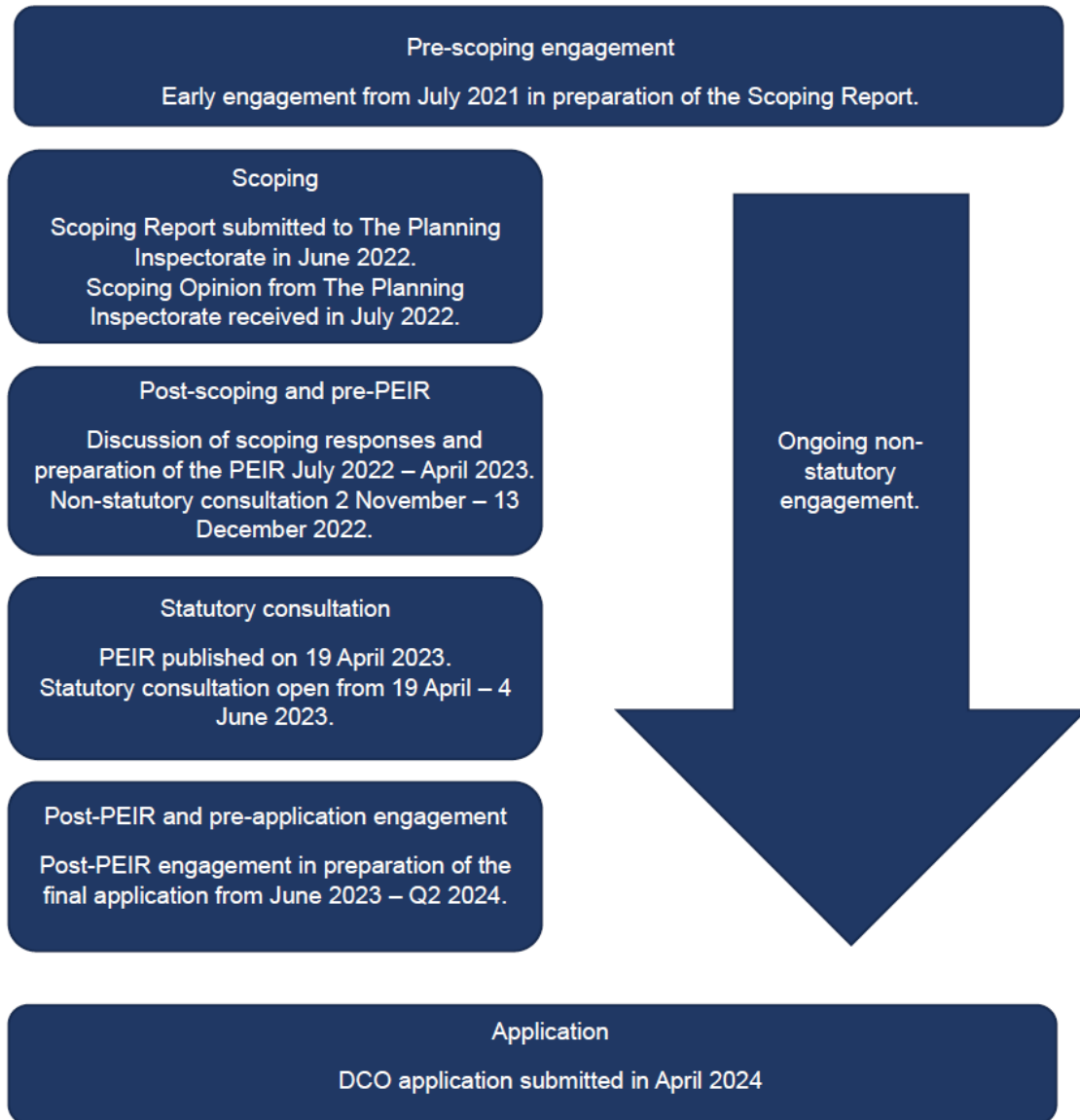


Figure 2.1: Summary of Approach to Consultation.

- 2.5.1.7 The Applicant has also undertaken ongoing stakeholder engagement throughout the pre-application stage. This includes technical meetings and workshops, one-to-one meetings and telephone calls with elected representatives, technical stakeholders and other interested parties. The Applicant also responded to any queries received via the consultation email and phone line.
- 2.5.1.8 The Applicant has undertaken an Evidence Plan Process (EPP), a formal mechanism whereby applicants and statutory bodies agree upfront what information and evidence an applicant should submit in support of an application for a NSIP. This process involves open, constructive, collaborative and solutions-focused engagement with technical stakeholders. Further information on the EPP and technical engagement is set out in section 4.4. Figure 2.2 below provides an overarching summary of technical engagement.

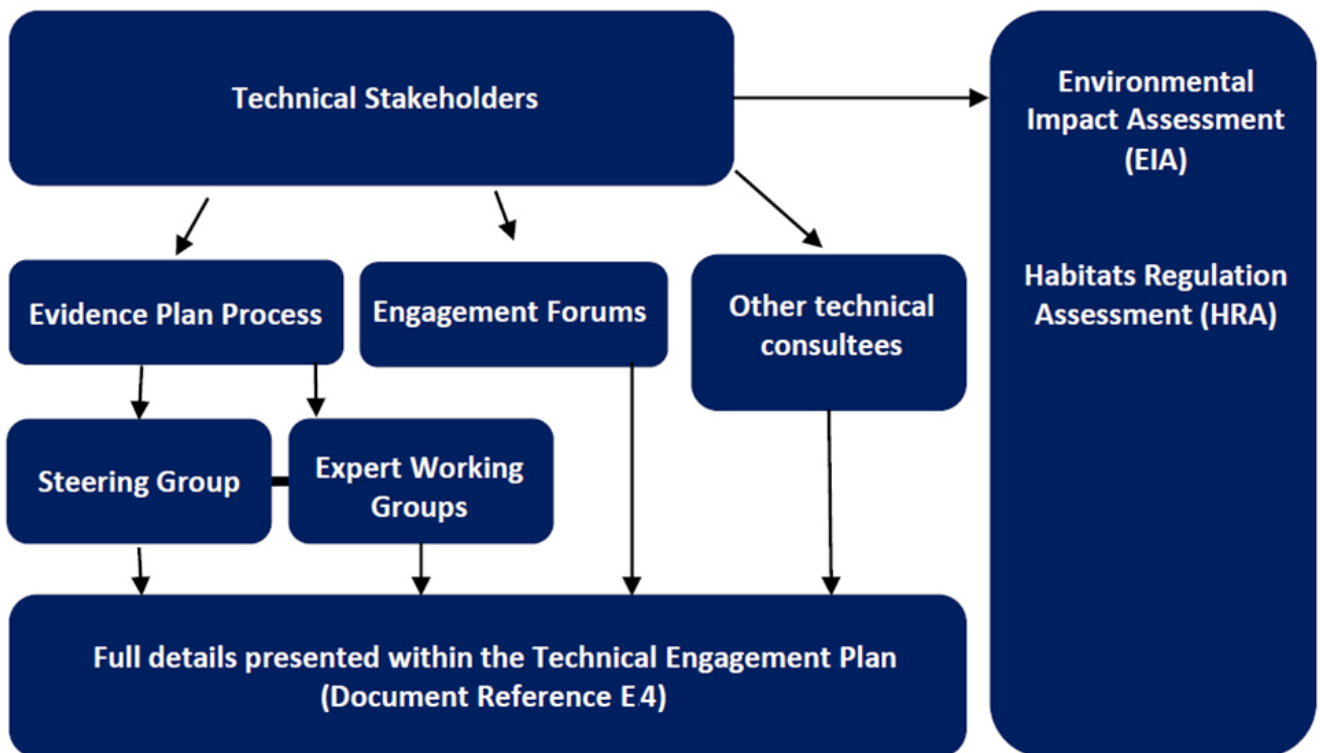


Figure 2.2: Summary of Approach to Technical Engagement.

2.6 Structure of the Consultation report

2.6.1.1 In accordance with Advice Note Fourteen, this Consultation report describes the consultation process carried out by the Applicant prior to submission of the application. Whilst the Advice Note does not issue prescriptive instructions, it does provide useful guidance, which this report follows in terms of the main format and structure, with the main sections covering:

- Executive Summary
- Introduction
- Legislation, Policy and Guidance
- Non-statutory consultation and engagement
- Statutory Consultation
- Duty to consult (section 42)
- Duty to consult the local community (section 47)
- Duty to publicise (section 48)
- EIA and Habitats Regulations consultation
- Summary of responses to the pre-application statutory consultation and the Applicant's regard to them (section 49)
- Post-statutory consultation and ongoing engagement
- Report appendices.

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2.6.1.2 The Consultation report is a standalone document but should be read in conjunction with other application materials where applicable.

2.6.1.3 Appendices provide evidence to accompany this report and demonstrate compliance with the requirements of the 2008 Act. A list of appendices is provided in Table 2.1 below.

Table 2.1: Consultation report appendices.

Appendices

A - Introduction

	A.1	Summary of consultation methods, locations and projects–
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B - Legislation, Policy and Guidance

	B.1	Consultation Compliance Checklist–
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C - Non-Statutory Consultation

	C.1	Early engagement: written communication, 14 July 2021
	C.2	Non-statutory consultation 07 November to 13 December 2022
		C.2.1 Information Postcard
		C.2.2 Posters
		C.2.3 Media Release
		C.2.4 Media Release Distribution List
		C.2.5 Media Releases: C.2.5.1 - Energy FM C.2.5.2 - North Lancashire's Beyond Radio C.2.5.3 - Lancashire Evening Post C.2.5.4 – BBC News C.2.5.5 - Isle of Man Today
		C.2.6 Consultation Launch Newspaper Adverts: C.2.6.1 - Lancashire Evening Post C.2.6.2 - Daily Post
		C.2.7 Consultation Launch email
		C.2.8 Consultation Launch email local stakeholders distribution list
		C.2.9 Seldom Heard Groups email and distribution list
		C.2.10 Social media activity
		C.2.11 Consultation Website
		C.2.12 Consultation Brochure
		C.2.13 Feedback Form

D - Statutory Consultation

	D.1	Statement of Community Consultation
	D.2	Preparation of Statement of Community Consultation

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Appendices

		D.2.1	First Draft Statement of Community Consultation
		D.2.2	Second Draft Statement of Community Consultation
	D.3	Publication of the Statement of Community Consultation	
		D.3.1	Blackpool Gazette (19 April 2023)
		D.3.2	Lancashire Post (19 April 2023)
		D.3.3	Barrow Mail (19 April 2023)
		D.3.4	Isle of Man Courier (21 April 2023)
	D.4	Section 47 Consultee List	
	D.5	Statutory Consultation Press Releases	
		D.5.1	Consultation Launch (19 April 2023)
		D.5.2	Consultation Close (23 May 2023)
	D.6	Consultation Website	
	D.7	Consultation Postcard	
	D.8	Consultation Brochure	
	D.9	Posters	
	D.10	Newspaper advertising	
		D.10.1	Blackpool Gazette: D.10.1.1 - Consultation Launch (19 April 2023) D.10.1.2 - Consultation Close (15 May 2023)
		D.10.2	Lancashire Post: D.10.2.1 - Consultation Launch (19 April 2023) D.10.2.2 - Consultation Close (15 May 2023)
		D.10.3	Liverpool Echo: D.10.3.1 - Consultation Launch (19 April 2023) D.10.3.2 - Consultation Close (17 May 2023)
		D.10.4	Isle of Man Courier: D.10.4.1 - Consultation Launch (21 April 2023) D.10.4.2 - Consultation Close (12 May 2023)
	D.11	Google Ad Consultation Launch and Consultation Close	
		D.11.1	Google Ads – Consultation Open
		D.11.2	Google Ads – Consultation Close
	D.12	Direct email communications	
		D.12.1	Advance Notice email (14 April 2023)
		D.12.2	Consultation Launch email (19 April 2023)
		D.12.3	Closing Soon email (22 May 2023)
		D.12.4	Last Chance email (02 June 2023)

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Appendices

	D.13	Webinar presentation	
	D.14	Statutory consultation automatic email response	
	D.15	Feedback Form	
	D.16	Section 42 consultee list	
	D.17	Regulation 11 list	
	D.18	Zone of Theoretical Visibility and LPA boundary mapping	
	D.19	Targeted statutory consultation	
		D.19.1	Targeted statutory consultation – number 02 example correspondence
		D.19.2	Targeted statutory consultation – number 03 example correspondence
	D.20	Notifying the Secretary of State under section 46	
		D.20.1	Email delivery report to Mr Shapps
		D.20.2	Planning Inspectorate Section 46 Notification
	D.21	The section 48 notice for the Morgan Generation Assets	
		D.21.1	Section 48 Notice
		D.21.2	Section 48 notice in newspapers: D.21.2.1 - Fishing News (12 April 2023) D.21.2.2 - Lloyd's List (12 April 2023) D.21.2.3 - London Gazette (12 April 2023) D.21.2.4 - The Guardian (12 April 2023) D.21.2.5 - Barrow Mail (12 and 19 April 2023) D.21.2.6 - Blackpool Gazette (12 and 19 April 2023) D.21.2.7 - Lancashire Post (12 and 19 April 2023) D.21.2.8 - Isle of Man Courier (14 and 21 April 2023)
		D.21.3	Media Articles: D.21.3.1 - BBC News (20 April 2023) D.21.3.2 - Isle of Man Today (14 April 2023)
	D.22	Regulation 8 letter (26 May 2022)	
	D.23	Transboundary Consultation	
		D.23.1	Regulation 32 Notice (10 October 2022)
		D.23.2	Planning Inspectorate Regulation 32 Notice London Gazette (17 October 2022)
		D.23.3	Regulation 32 Republic of Ireland Response (21 November 2022)
	D.24	Summary of responses to statutory consultation and applicant regard	
		D.24.1	Overarching consultation process and non-technical comments table of responses

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Appendices

		D.24.2	Introduction and glossary table of responses
		D.24.3	Project description table of responses
		D.24.4	Site selection and consideration of alternatives table of responses
		D.24.5	Environmental Impact Assessment methodology table of responses
		D.24.6	Physical processes table of responses
		D.24.7	Benthic subtidal ecology table of responses
		D.24.8	Fish and shellfish ecology table of responses
		D.24.9	Underwater sound table of responses
		D.24.10	Marine mammals table of responses
		D.24.11	Offshore ornithology table of responses
		D.24.12	Commercial fisheries table of responses
		D.24.13	Shipping and navigation table of responses
		D.24.14	Marine archaeology table of responses
		D.24.15	Other sea users table of responses
		D.24.16	Seascape, landscape and visual resources table of responses
		D.24.17	Aviation and radar table of responses
		D.24.18	Climate change table of responses
		D.24.19	Socio-economics table of responses
		D.24.20	Human health assessment table of responses
		D.24.21	Draft Habitats Regulations Assessment table of responses
		D.24.22	Draft Development Consent Order (including deemed marine licences) table of responses

E - Post-Statutory consultation engagement - newsletter September 2023

E.1	Newsletter September 2023
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2.7 Co-ordinated consultation approach

- 2.7.1.1 The Morgan Generation Assets, the Mona Offshore Wind Project and the Morecambe Generation Assets (being promoted by Flotation Energy Ltd. and Cobra Instalaciones y Servicios, S.A. (Cobra)) are offshore wind farms being developed in the Irish Sea.
- 2.7.1.2 Due to the geographical proximity of the three wind farms, their similar construction timelines and their potential for cumulative impacts, the respective applicants chose to hold their statutory consultations concurrently and collaboratively.
- 2.7.1.3 This allowed for the likelihood that attendees to the consultation events would expect alignment from the three projects (dates/times/locations) and the materials being

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presented. It also encouraged consultees to appreciate that the cumulative impacts of the adjacent projects had been and would continue to be considered as the applicants progressed their proposals.

- 2.7.1.4 The applicants were conscious of avoiding ‘consultation fatigue’ by consulting on the geographically adjacent (but separate) projects consecutively in the same areas of northwest England and on the Isle of Man. Based on their location, the Morgan Generation Assets and Morecambe Generation Assets were required to consult on mainland England and the Isle of Man. The Mona Offshore Wind Project and Morecambe Generation Assets were required to consult in Wales and on the Isle of Man.
- 2.7.1.5 Despite this joint consultation, the three offshore wind farms remain separate projects, which are each the subject of their own DCO applications. Consideration was therefore given on how to minimise potential confusion among stakeholders and communities. As a result, the decision was made to carry out specific combined activities and create specific combined materials, where appropriate.
- 2.7.1.6 For example, Morgan Generation Assets and Morecambe Generation Assets combined certain promotional materials and activities for publicising their consultations on the Isle of Man. Specifically, the projects decided to create postcards promoting the consultation and joint consultation events, a single poster that was distributed to display locations and also to share online, print and Google advertising space.
- 2.7.1.7 In addition, joint exhibitions were also held to help increase participation in the two consultations. This approach enabled visitors to the joint events to find out about, and provide feedback in relation to, either project, or both projects, during a single visit.
- 2.7.1.8 Each project published its own SoCC, consultation brochure, feedback forms and exhibition displays.
- 2.7.1.9 A table showing a summary of consultation methods, locations, joint exhibitions and projects represented is provided at Appendix A.1.

3 LEGISLATION POLICY AND GUIDANCE

3.1 Introduction

3.1.1.1 This Consultation report has been prepared and submitted in accordance with the requirements set out within section 37 of the 2008 Act. Section 37(3)(c) requires an application for an order granting development consent to be accompanied by a Consultation report. Section 37(7) sets out that the Consultation report should give details of:

- What has been done to comply with the duty to consult with prescribed consultees and local authorities (section 42), the local community (section 47) and to publicise the application (section 48)
- Any relevant responses and the account taken of such responses (section 49).

3.1.1.2 Relevant responses are defined in section 49(3) of the 2008 Act as responses received to consultation under section 42, 47 and 48, by the deadline published. Additionally, where possible and necessary (for example, where the Applicant became aware of additional section 42 consultees), this feedback has also been referenced, up to as close to the submission of the DCO application as possible, even where this was outside the response period given.

3.1.1.3 The legislative context of these sections of the 2008 Act and how the Applicant has met these requirements is further described in the associated sections of the Consultation report as follows:

- The duty to consult under section 42 is addressed in section 5.3 of this report
- The duty to consult under section 47 is addressed in section 5.2 of this report
- The duty to publicise under section 48 is addressed in section 5.6 of this report.

3.1.1.4 This report also details non-statutory consultation that takes place outside of the requirements of the 2008 Act to ensure that the Planning Inspectorate and others have a comprehensive understanding of all consultation activity undertaken. This is addressed in section 4.

3.2 Relevant legislation and guidance

3.2.1.1 The Applicant developed a phased approach to the pre-application consultation and in doing so gave careful consideration to the specific requirements set out in the following legislation:

- The Planning Act 2008 (the 2008 Act)
- The Infrastructure Planning (Applications, Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations)
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017).

3.2.1.2 The Applicant has also taken into consideration the National Policy Statements (NPSs). The NPSs were first designated by the Department of Energy and Climate Change in 2011 and revised in November 2023. They describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority and decision-maker when examining an application for development consent. There

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are six energy NPSs, two of which are directly relevant to offshore wind development and therefore the Morgan Generation Assets, specifically:

- Overarching NPS for Energy (NPS EN-1) (Department for Energy Security and Net Zero, 2023a)
- NPS for Renewable Energy Infrastructure (NPS EN-3) (Department for Energy Security and Net Zero, 2023b).

3.2.1.3 The NPS for Electricity Networks Infrastructure (NPS EN-5) (Department for Energy Security and Net Zero, 2023c) is also relevant as it relates to electricity network applications including sub-sea cables.

3.2.1.4 The revised NPSs were designated 17 January 2024. Further detail on the NPSs can be found within the Planning Statement (Document Reference J2).

3.2.1.5 Section 50 of the 2008 Act provides for guidance to be issued, regarding pre-application requirements and that an applicant must have regard to any such guidance. In undertaking consultation and preparing this Consultation report, the following guidance and advice notes have been taken into consideration and complied with:

- The former DCLG (now DLUHC) Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance)
- Planning Inspectorate Advice Note Three, EIA notification and consultation (August 2017, version 7) (Advice Note Three)
- Planning Inspectorate Advice Note Six, Preparation and submission of application documents (version 11) (Advice Note Six)
- Planning Inspectorate Advice Note Seven, Environmental Impact Assessment: process, preliminary environmental information and environmental statements (June 2020, version 7) (Advice Note Seven)
- Planning Inspectorate Advice Note Eleven, Working with public bodies in the infrastructure planning process (November 2017, version 4) (Advice Note Eleven)
- Planning Inspectorate Advice Note Twelve, Transboundary Impacts and Process (December 2020, version 6) (Advice Note Twelve)
- Planning Inspectorate Advice Note Fourteen, Compiling the Consultation Report (February 2021, version 3) (Advice Note Fourteen).

3.2.1.6 Section 5.7 of this report sets out a summary of consultation undertaken in accordance with the EIA Regulations 2017 and Habitats Regulations, with further details set out in the Environmental Statement (Document Reference F1 – F4) and Technical Engagement Plan (TEP) (Document Reference E4). The primary focus of this Consultation report is on consultation undertaken in accordance with sections 42, 46, 47 and 48 of the 2008 Act.

3.2.1.7 As established in section 2.12.1.1.2 of this report, there are a number of provisions of the 2008 Act which do not apply to Morgan Generation Assets as the DCO application boundary is located wholly within the marine environment, with no onshore infrastructure. There is therefore no 'local authority' to be consulted on a statutory basis in accordance with sections 42(1)(b) and 43 of the 2008 Act. Secondly, the duty under section 47 to consult with "people in the vicinity of the land" does not apply. Notwithstanding this, section 5.2 and section 5.3 of this report sets out how the

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Applicant has aligned with the requirements of the 2008 Act, taking into consideration advice notes, and carried out its statutory consultation.

- 3.2.1.8 To demonstrate that the Applicant has met the requirements of both legislation and guidance regarding pre-application consultation, a Consultation Compliance Checklist is provided within Appendix B.1.

3.3 Approach to consultation

- 3.3.1.1 In addition to adhering to all legal requirements, the Applicant committed to a consultation underpinned by an ethos of being open, constructive, collaborative, and solutions focused. The Applicant's website¹ states its commitment to seek to:

- Listen to its stakeholders and engage with integrity and respect
- Set out its principles openly and transparently
- Recognise differences and work together to find mutually acceptable solutions that are reasonable and proportionate to our impact in the local area.

- 3.3.1.2 The insight and local knowledge received through each phase of consultation allowed the Applicant to understand the expectations of those who live and work closest to the proposed Morgan Generation Assets development. When developing the consultation mailing zone (see section 5.2.4 below), the Applicant made sure to take into account the need to engage with a wide cross section of society. The consultation was designed to be open to anyone who felt directly or indirectly impacted by the project, including:

- Local communities – people with homes and businesses in the consultation zone and those outside who have previously commented on the proposals
- Elected representatives – community councils; county councillors
- Members of Parliament (MPs) and Members of Senedd (MSs)
- Seldom heard groups (SHG)
- Identified special interest groups
- Prescribed bodies and statutory consultees
- Local authorities
- Those who could be potentially impacted visually by the Morgan Generation Assets.

- 3.3.1.3 The Applicant gave regard to equal opportunities and diversity throughout its consultations. For example, the Consultation Brochures for both non-statutory and statutory phases of consultation stated that readers could request the information in an alternative (more accessible) format. All consultation events were organised in accessible venues.

- 3.3.1.4 From the outset, the Applicant took data privacy seriously and all data was held in line with General Data Protection Regulation (GDPR) best practice. The feedback form, as referenced in section 5.2.20, clearly stated why data, including name, email and address, was being collected and contained the Applicant's privacy notice. The form also clearly stated that the data might be shared with relevant government bodies,

¹ www.enbw-bp.com

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such as the Planning Inspectorate and the DESNZ, to support the development consent application process, along with contractors and suppliers with whom the Applicant had contracts in place to support the development of the Morgan Generation Assets. The notice stated that the Applicant would keep the information for the time required to fulfil the purposes of the application.

- 3.3.1.5 This Consultation report and its accompanying appendices are also in compliance with GDPR best practice.

4 NON STATUTORY CONSULTATION

4.1 Introduction

- 4.1.1.1 Consultation and ongoing engagement activities conducted beyond the statutory obligations under sections 42, 47 and 48 of the 2008 Act are referred to within this report as non-statutory consultation.
- 4.1.1.2 Feedback from non-statutory consultation and ongoing stakeholder engagement activities has been considered by the Applicant and used throughout the development of the Morgan Generation Assets to inform the design, alongside comments received during statutory consultation.
- 4.1.1.3 While the consenting strategies for the Morgan Generation Assets and Mona Offshore Wind Project were still being developed, the two projects would often be referred to in the same materials/communications. Once the consenting strategies for the two projects had been confirmed, and prior to the submission of the Morgan Scoping Report (Morgan Offshore Wind Ltd, 2022) the projects were referred to separately in materials/communications.

4.2 Relevant guidance

- 4.2.1.1 By its very definition, there is no statutory requirement for non-statutory consultation to be undertaken. However, the Guidance on the pre-application process (March 2015), set out by the former DCLG (now DLUHC), highlights at paragraph 29 the likely need for detailed, technical input from expert bodies in advance of formal consultation in compliance with the pre-application requirements. It details: *‘Early engagement with these bodies can help avoid unnecessary delays and the costs of having to make change at later stages in the process’*.
- 4.2.1.2 Paragraph 70 also goes on to suggest that applicants may wish to consider undertaking early non-statutory consultation at a stage where options are still being considered, as this may help inform proposals and assist the applicant in establishing a preferred option on which to undertake statutory consultation.
- 4.2.1.3 Advice Note Fourteen also recognises that applicants may have engaged in non-statutory consultation prior to statutory consultation under the 2008 Act. The Advice Note advises that any consultation not carried out under the provisions of the 2008 Act is separately identified from statutory consultation within the Consultation report. Engaging with stakeholders in early non-statutory consultation, although not required under the 2008 Act, promotes best practice and encourages full engagement with local communities.

4.3 Early engagement

4.3.1 Spring/Summer 2021

- 4.3.1.1 Non-statutory consultation started in spring/summer 2021, with a written communication to stakeholders in July 2021.
- 4.3.1.2 This introduced both the Morgan Generation Assets to stakeholders along the coast of northwest England and north Wales. This early communication was positioned as a broad introduction - establishing the Applicant for the first time and opening a line of communication.

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- 4.3.1.3 Given the very early nature of this communication, both the Morgan Generation Assets and Mona Offshore Wind Project were referred to and the communications sent to stakeholders in the relevant regions of both England and Wales. An example of this correspondence, dated 14 July 2021, is included in Appendix C.1.
- 4.3.1.4 This 2021 communication recognised that this could have been the first time many of the stakeholders would have been made aware of the Applicant's intention to develop the wind farm(s), and set out the following key points:
- Introducing bp and EnBW as the successful Round 4 bidders within the leasing process run by TCE
 - The likely size and generating capacity of Morgan Generation Assets (and Mona Offshore Wind Project)
 - The fact that the Points of Interconnection (POI) to the electricity transmission network were not yet known
 - Offshore surveys had commenced, as had liaison with key marine/maritime stakeholders
 - There would be consultation with communities and stakeholders, with informal engagement starting shortly and feeding into formal community consultations in 2022
 - It was hoped the projects would be in a position to start generating energy by 2028
 - A project website² launched by bp and EnBW would provide further information.
- 4.3.1.5 The communication was sent, via email, to the lead officers and elected representatives at local authorities listed in Table 4.1 below.

Table 4.1: Recipients of July 2021 email communication (lead officers and elected representatives) regarding both Morgan Generation Assets and Mona Offshore Wind Project.

Local Authority	Position
Cheshire West and Chester Council	Deputy Chief Executive - Communities, Environment and Economy
Cheshire West and Chester Council	Cabinet Member for Housing, Planning and Climate Emergency
Cyngor Bwrdeistref Sirol Conwy/Conwy County Borough Council	Cabinet Member for Environment and Transportation
Cyngor Gwynedd/Gwynedd Council	Cabinet Member for Environment/Councillor for Y Felinheli
Cyngor Sir Ddinbych/Denbighshire County Council	Lead Member for Waste, Transport and the Environment / Councillor for Rhyl South East
Cyngor Sir Ddinbych/Denbighshire County Council	Leader of the Council
Cyngor Sir Ynys Môn/Isle of Anglesey County Council	Major Projects and Economic Development Portfolio Holder

² www.enbw-bp.com

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Local Authority	Position
Cyngor Sir Ynys Môn/Isle of Anglesey County Council	Leader of the Council/Councillor for Talybolion
Fylde Council	Chair of Planning Committee
Fylde Council	Head of Planning
Knowsley Council	Head of Planning
Lancashire County Council	Head of Planning
Lancashire County Council	Leader of the Council
Liverpool City Council	Head of Planning
Preston City Council	Cabinet Member for Planning and Regulation/Councillor for Lea & Larches
Sefton Council	Cabinet Member - Planning and Building Control
Sir y Fflint/Flintshire County Council	Cabinet Member for Planning and Public Protection
Sir y Fflint/Flintshire County Council	Chief Officer - Planning and Environment
South Ribble Borough Council	Cabinet Member for Planning, Business Support and Regeneration
St Helens Council	Head of Planning
West Lancashire Borough Council	Portfolio Holder for Planning
Wirral Council	Chair - Environment, Climate Emergency and Transport Committee

4.3.1.6 In addition, the notification was sent to MPs and MSs representing local and regional constituencies across the coast of northwest England and north Wales. This included those listed in Table 4.2 below.

Table 4.2: MP and MS recipients.

Constituency	MP/MS
Member of Parliament for Wirral South	Alison McGovern MP
Member of Parliament for Wallasey	Angela Eagle MP
Member of Parliament for Sefton Central	Bill Esterson MP
Member of the Senedd for North Wales	Carolyn Thomas MS
Member of Parliament for City of Chester	Chris Matheson MP
Member of Parliament for Southport	Damien Moore MP
Member of Parliament for Walton Liverpool	Dan Carden MP
Member of the Senedd for Clwyd West	Darren Millar MS
Member of Parliament for Clwyd West	David Jones MS
Member of the Senedd for Vale of Clwyd	Gareth Davies MS
Member of Parliament for Knowsley	George Howarth MP
Member of the Senedd for Delyn	Hannah Blythyn MS

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Constituency	MP/MS
Member of Parliament for Arfon	Hywel Williams MP
Member of the Senedd for Alyn and Deeside	Jack Sargeant MS
Member of Parliament for Vale of Clwyd	James Davies MP
Member of the Senedd for Aberconwy	Janet Finch-Saunders MS
Member of Parliament for Ellesmere Port and Neston	Justin Madders MP
Member of Parliament for South Ribble	Katherine Fletcher MP
Member of the Senedd for North Wales	Llyr Gruffydd MS
Member of Parliament for Wirral West	Margaret Greenwood MP
Member of Parliament for Preston	Mark Hendrick MP
Member of the Senedd for North Wales	Mark Isherwood MS
Member of Parliament for Fylde	Mark Menzies MP
Member of Parliament for Alyn And Deeside	Mark Tami MP
Member of Parliament for Bootle	Peter Dowd MP
Member of the Senedd for Ynys Môn	Rhun ap Iorwerth MS
Member of Parliament for Delyn	Rob Roberts MP
Member of Parliament for Aberconwy	Robin Millar MP
Member of Parliament for West Lancashire	Rosie Cooper MP
Member of the Senedd for North Wales	Sam Rowlands MS
Member of the Senedd for Arfon	Siân Gwenllïan MS
Member of Parliament for Ynys Môn	Virginia Crosbie MP

4.3.1.7 As further detail became available, between November 2021 and January 2022, introduction briefings were followed by project updates to planning officers and lead members at local authorities across northwest England. Engagement also began with technical stakeholders as part of the EPP in November 2021 (see section 4.4).

4.3.1.8 This series of briefings was held via Microsoft Teams and centred around a PowerPoint presentation. The presentations were either ‘technical’ presentations, where the attendees were planning or other officers from local authorities, or ‘non-technical briefings’ where the attendees were wholly or largely elected members. In practice, the presentations were similar in scope, but with ‘technical’ briefings offering more detail on the consenting and site selection processes. Presentations were provided in which the transmission assets were also discussed which will be reported within the Morgan and Morecambe Offshore Wind Farms: Transmission Assets DCO application, plus the following topics.

- An overview of the Morgan Generation Assets
- Activities conducted during 2021
- An indicative project timeline
- A stakeholder engagement timeline

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- High level assessments of the potential economic impacts.

4.3.1.9 Briefings were conducted with:

- Chorley Council
- Lancashire County Council
- Preston City Council
- South Ribble Borough Council
- West Lancashire Borough Council
- Wigan District Council.

4.3.1.10 Briefings were also offered to Blackpool Council, Fylde Council, Knowsley Metropolitan Borough Council, Sefton Council and St Helens Borough Council, which declined the offer. The invitation was left open by the Applicant, with a commitment made to continue updating the authority on progress. Minutes were taken during the meetings that were held and then circulated to those in attendance for record keeping and future reference.

4.3.1.11 An email was sent on 06 May 2022 to those who attended the above briefings. The email informed them that the Mona Offshore Wind Project's POI had been chosen, and that work was still ongoing to find a point of interconnection for the Morgan Generation Assets.

4.3.2 Follow-up meetings

4.3.2.1 Follow-up meetings were held with elected representatives and regional forums between 2022 and 2023 to keep them updated on progress, this included:

- Mark Menzies MP
- Lancashire County Council
- South Ribble Borough Council
- Fylde Council
- Preston City Council
- Blackpool Council
- Barrow in Furness Borough Council
- Cumbria Local Enterprise Partnership (LEP)
- Blackpool, Fylde and Wyre Prosperity Board.

4.3.3 Environmental Impact Assessment Scoping

4.3.3.1 The Applicant submitted the Morgan Generation Assets Scoping Report (Morgan Offshore Wind Ltd, 2022) (pursuant to Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations 2017), to the Planning Inspectorate (on behalf of the Secretary of State) on 14 June 2022.

4.3.3.2 The Scoping Report was subsequently consulted on by the Planning Inspectorate and a Scoping Opinion adopted by the Secretary of State on 22 July 2022 (The Planning Inspectorate, 2022).

4.4 The EPP, Engagement Forums and technical consultation

4.4.1 Overview

4.4.1.1 The Applicant has met with stakeholders to undertake technical consultation throughout the pre-application phase. Feedback from this technical consultation provided the information and evidence required for EIA and HRA processes.

4.4.1.2 These discussions took place as part of the EPP, Engagement Forums and wider technical consultation. The TEP (Document Reference E4) presents full details of all technical consultation carried out with stakeholders outside the statutory consultation process and is summarised below.

4.4.1.3 Please also refer to Figure 2.2 for an overarching summary of this technical engagement.

4.4.2 Evidence Plan Process

4.4.2.1 The Applicant has undertaken an EPP for Morgan Generation Assets. Evidence Plans are formal mechanisms to agree between applicants and statutory bodies, what information and evidence an applicant should submit in support of an application for an NSIP. Whilst the process was initially aimed at ensuring compliance with the Habitats Regulations (Defra, 2012), it has increasingly also been applied to relevant EIA matters, as well as the Marine Conservation Zone (MCZ) assessment process.

4.4.2.2 Evidence Plans aim to reduce the risk of NSIPs being delayed by issues relating to the Habitats Regulations (also EIA and MCZ matters for this Evidence Plan) during the evolution of a proposed DCO application. The process records the key areas of agreement and any outstanding areas of disagreement between the relevant participants, which will ultimately form the basis of Statements of Common Grounds (SoCGs) which will start to be prepared during the pre-examination phase and updated, as required, through examination (see section 7 for further information).

4.4.2.3 An Evidence Plan Steering Group has been established for Morgan Generation Assets, which has met at key milestones throughout the EIA and HRA process. In addition, Expert Working Groups (EWGs) have been established to discuss topic-specific issues with relevant stakeholders. Those involved as part of these groups are listed below.

Steering Group

4.4.2.4 An Evidence Plan Steering Group has been established and comprises:

- The Planning Inspectorate
- The Applicant
- Natural England
- The Marine Management Organisation (MMO)
- Natural Resource Wales (NRW)
- The Joint Nature Conservation Committee (JNCC).

4.4.2.5 These participants were invited as the key regulatory and Statutory Nature Conservation Bodies (SNCBs).

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4.4.2.6 Both the Mona Offshore Wind Project and the Morgan Generation Assets DCO applications have been discussed under one Evidence Plan; as such the Steering Group includes both English and Welsh stakeholders, which was beneficial in terms of assessing cumulative and in combination effects alongside alignment of assessment approaches and mitigation measures. The Steering Group has overseen the development and monitoring of the Evidence Plan and its subsequent progress. They first met at the start of the EPP in November 2021 and have continued to meet on a regular basis throughout the project programme. Full details of the Steering Group remit and meeting details are set out in the TEP (Document Reference E4).

Expert Working Groups

4.4.2.7 In addition, as part of the EPP, EWGs have been established to discuss topic-specific issues with relevant stakeholders. EWG meetings have been held regularly throughout the process since February 2022 to provide the opportunity for stakeholders to give feedback and advice to inform the EIAs and HRA processes as well as site selection and project development and refinement. The process has been iterative, and each group has worked through the discussion points and to reach agreement, as far as possible, during the pre-application phases. Full details are set out in the TEP (Document Reference E4).

4.4.2.8 Table 4.3 below sets out the EWGs which have been established and their participants, the Applicant and advisors are represented within each EWG:

Table 4.3: Expert Working Groups and the Participants.

Expert Working Group	Participants
Benthic Ecology, Fish and Shellfish and Physical Processes	Centre for Environment, Fisheries and Aquaculture (Cefas) Environment Agency (EA) Isle of Man Department for Environment, Food and Agriculture (IoM, Defa) JNCC MMO Natural England NRW The Wildlife Trusts (TWT)
Marine Mammals	Cefas IoM Defa JNCC MMO Natural England NRW TWT
Offshore Ornithology	IoM Defa JNCC MMO Natural England NRW Royal Society for the Protection of Birds TWT

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4.4.3 Engagement Forums

4.4.3.1 In addition to the technical consultation undertaken under the EPP, Engagement Forums were set up to engage stakeholders outside of the EPP.

Marine Navigation Engagement Forum

4.4.3.2 The objectives of the Marine Navigation Engagement Forum (MNEF) was to provide a platform for the exchange of information, knowledge and experience, allowing marine developers and relevant shipping and navigation stakeholders to coexist in the marine environment. The overarching strategy was to establish and actively maintain a structured basis by which the project and relevant shipping and navigation stakeholders engage with each other and share information, evidence and feedback.

4.4.3.3 Table 4.4 below sets out the members of the MNEF, alongside the developers coordinating the process.

Table 4.4: Marine Navigation Engagement Forum Participants

User group	Organisation
Developers coordinating the MNEF	
Marine Developers	bp and EnBW (Morgan Generation Assets, Mona Offshore Wind Project and Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Partners)
Marine Developers	Flotation Energy (Morecambe Offshore Wind Farm and Morgan and Morecambe Offshore Wind Farms Transmission Assets Development Partners)
Marine Developer Representative	RPS (Morgan Generation Assets EIA and HRA lead)
Marine Developer Representative	NASH Maritime (Morgan Generation Assets shipping and navigation consultant)
All other MNEF members	
Aggregate Industry	Boskalis
Commercial Navigation Users	WS Mezeron
Emergency Service	Lancashire Fire and Rescue
Ferry Operator	Isle of Man Steam Packet Company Limited (IoMSPC)
Ferry Operator	Seatruck Group
Ferry Operator	Stena Line
Ferry Operator	P&O Ferries
Fishing Industry	Anglo-North Irish Fish Producers Organisation
Fishing Industry	Isle of Man Fishermen
Fishing Industry	Irish South & East Fish Producers Organisation
Fishing Industry	National Federation of Fishermen's Organisations (NFFO)
Fishing Industry	Northern Ireland Fish Producers' Organisation (NIFPO)
Fishing Industry	Scottish Fishermen's Federation (SFF)
Fishing Industry	Scottish White Fish Producers Association
Fishing Industry	Sea-Fisheries Protection Authority
Fishing Industry	Fishing Industry Representative

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User group	Organisation
Developers coordinating the MNEF	
Fishing Industry	Welsh Fishermen's Association - Cymdeithas Pysgotwyr Cymru
Fishing Industry	West Coast Sea Products Ltd
Governmental Department	MMO
Governmental Department	Ministry of Defence (MOD)
Governmental Department	IoM Government
Marine Developers	Ørsted
National Body (Recreation)	Royal Yachting Association
National Body (Recreation)	Cruising Association
National Institution	Royal National Lifeboat Institution (RNLI)
Oil & Gas Operators	ENI
Oil & Gas Operators	Harbour Energy
Oil & Gas Operators	Spirit Energy
Port Operators	Associated British Ports (ABP)
Port Operators	Belfast Harbour
Port Operators	Dublin Port
Port Operators	Peel Ports
Port Operators	Port of Mostyn
Port Operators	Warrenpoint Harbour
Statutory Authority	Maritime and Coastguard Agency (MCA)
Statutory Authority	His Majesty's Maritime Coastguard
Statutory Authority	Trinity House Lighthouse Service (THLS)
Statutory Authority	Northern Lighthouse Board
Statutory Authority	North Western Inshore Fisheries And Conservation Authority
Trade Association	International Chamber of Shipping
Trade Association	Irish Chamber of Shipping
Trade Association	UK Chamber of Shipping

Archaeology and Heritage Engagement Forum

- 4.4.3.4 The Archaeology and Heritage Engagement Forum (AHEF) aimed to address offshore archaeology and heritage issues early on in the pre-application process, streamlining these decisions whilst also focussing on the evidence requirements which aim to be proportionate to the potential impacts. The overall aim of the forum and in conjunction with the Applicant from the Mona Offshore Wind Project, was to ensure that impacts on offshore archaeology and heritage were identified, reduced, assessed and mitigated.

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4.4.3.5 Table 4.5 below sets out the participants of the AHEF. The Applicant and their advisors are also represented. Note that the AHEF also included Welsh consultees relevant to the Mona Offshore Wind Project.

Table 4.5: The Archaeology and Heritage Engagement Forum Participants.

Engagement Forum	Participant
AHEF	Cadw
	Historic England (HE)
	MMO
	Royal Commission on the Ancient and Historical Monuments of Wales

4.4.3.6 Full details of the Engagement Forums and meetings are set out in the TEP (Document Reference E4).

4.4.4 Other technical consultation

4.4.4.1 Technical engagement has also taken place with stakeholders relating to the following topics:

- Aviation and radar
- Commercial fisheries
- Human health
- Other sea users
- Noise and vibration
- Seascape, landscape and visual resources
- Shipping and navigation
- Socio-economics.

4.4.4.2 Full details of discussions held are set out in full in the 'Other Technical Consultation' section of the TEP (Document Reference E4).

4.5 Non-statutory consultation process

4.5.1 Consultation period - 02 November to 13 December 2022

4.5.1.1 Following the initial engagement with stakeholders detailed previously, non-statutory consultation ran for 41 days between 02 November and 13 December 2022.

4.5.1.2 To avoid consultation fatigue, and to present a full picture of the proposed development to stakeholders, the Applicant consulted together with the Morecambe Generation Assets and the Morgan and Morecambe Offshore Wind Farms: Transmission Assets projects.

4.5.1.3 The Applicant also produced a consultation mailing zone to publicise the consultation. The consultation mailing zone was identified by reference to the search area for onshore infrastructure associated with the Transmission Assets, and also by giving consideration to the potential visual impacts of the turbine arrays. This first initial mailing zone covered 36,405 residential and business addresses in the FY4, FY8,

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PR1, PR2, PR4 postcodes, as shown in Figure 4.1 below. In addition, the Applicant used a commercial service provided by the Isle of Man Post Office to distribute consultation postcards to all 45,811 residential and business addresses on the Isle of Man.

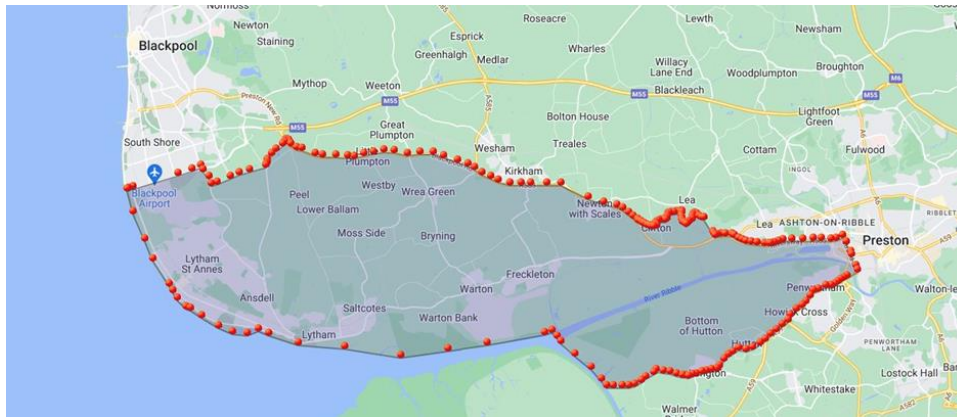


Figure 4.1: Non-Statutory Initial Mailing Zone.

4.5.1.4 The consultation materials covered the following key project areas:

- An introduction to the projects and the joint venture partners proposing to build each wind farm
- An overview of offshore infrastructure, including plans for turbines and the construction of offshore wind farms
- Information on onshore infrastructure, including plans for a point of interconnection, substations and cable route
- Details of the planning application process and how NSIPs are consented
- Key background on other important issues, including environment and technical assessments, jobs and skills and project timeline.

4.5.1.5 The consultation launched on 02 November 2022, and was promoted in the following ways:

- An information postcard (Appendix C.2.1) was distributed to 36,405 addresses within the onshore scoping search area. This postcard related to the Morgan Generation Assets and the Morecambe Generation Assets. These included residential and business addresses with postcodes FY4, FY8, PR1, PR2 and PR4. The postcards were sent in advance of the consultation launch on 02 November 2022
- Ahead of the consultation launch, posters were sent to 36 local community organisations and councils in England with a request to display at appropriate locations. The posters were received before the day of the consultation launch on 01 November 2022. Posters were also sent to 43 locations on the Isle of Man (Appendix C.2.2)
- A media release (Appendix C.2.3) was distributed to media outlets (Appendix C.2.4) on 04 November 2022 announcing the launch of the consultation and explaining how to access consultation materials and provide feedback. The

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media release was covered by Energy FM, North Lancashire's Beyond Radio, the Lancashire Evening Post, BBC News and Isle of Man Today (Appendix C.2.5)

- Advertisements (Appendix C.2.6) appeared in the Lancashire Evening Post and Daily Post. The advertisements were timed to coincide with the start of consultation events, detailing events in each area alongside webinar and general consultation information
- An email (Appendix C.2.7) was distributed to local stakeholders (Appendix C.2.8), alerting them to the launch of the consultation and inviting them to take part. These stakeholders included MPs for immediate and neighbouring constituencies, local planning authorities, local elected leaders, councils and interest groups such as associations, universities, government agencies and environmental groups
- The email was also distributed to local SHGs (Appendix C.2.9)
- Social media activity was also delivered via four posts (Appendix C.2.10) on the Flotation Energy LinkedIn page, which has more than 5,000 followers.

4.5.1.6 The project website³ was updated for consultation launch, (Appendix C.2.11) and new content was added to the website. This included:

- Introduction to the Morgan Generation Assets, Morecambe Generation Assets, and Morgan and Morecambe Offshore Wind Farms: Transmission Assets
- A note on the Mona Offshore Wind Project, including directions to the separate Mona Offshore Wind Project website
- Background on Morgan Offshore Wind Limited, bp and EnBW
- Information relating to onshore infrastructure, including broad plans for a point of interconnection, substation and cable route (now covered by the Morgan and Morecambe Offshore Wind Farms: Transmission Assets)
- Information relating to offshore infrastructure, including broad plans for turbines and background information on the construction of offshore windfarms
- Environmental and technical assessments
- How energy will reach homes and businesses
- Consenting process
- Crown Estate Offshore Wind Leasing Round 4
- Jobs and skills
- Consultation events
- Feedback form
- Feedback map
- Downloads, including:
 - Consultation brochure (Appendix C.2.12)
 - Feedback form (Appendix C.2.13)

³ <https://www.morecambeandmorgan.com>

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– Morgan Generation Assets Scoping Report (Morgan Wind Ltd, 2022).

4.5.1.7 Consultation events were held and attended as detailed in Table 4.6 below:

Table 4.6: Non-Statutory consultation events.

Location	Date and Time	Number of attendees
Douglas Borough Council, Town Hall, Ridgeway Street, Douglas, Isle of Man IM99 1AD	03 November 2022 3-7pm	85
Webinar	10 November 2022 6.30-8pm	47
Barrow-in-Furness Leisure Centre, Greengate St, Barrow-in-Furness, LA13 9DT	18 November 2022 10am-1pm	45
Morecambe War Memorial Hall, Church St, Morecambe LA4 5PR	19 November 2022 2.30-6.30pm	2
Lytham Assembly Rooms, Dicconson Terrace, Lytham FY8 5JY	21 November 2022 3-7pm	151
Fleetwood YMCA Leisure Centre, Fleetwood FY7 6HF	22 November 2022 10am-1pm	26
Blackpool Tourist Information Centre, Promenade, Blackpool FY1 1AP	22 November 2022 2:30-4:30pm	0
Preston Fishergate Shopping Centre, Preston PR1 8HJ	23 November 2022 10am-1pm	7
Hutton Village Hall, Moor Ln, Hutton, Preston PR4 5SE	23 November 2022 3-7pm	99
Southport Eco Centre, Esplanade, Southport PR8 1RX	24 November 2022 10am-1pm	52
The Guild Hall, Church Rd, Formby, Liverpool L37 3NG	24 November 2022 3-7pm	1
Amlwch Town Hall, Amlwch LL68 9EN	30 November 2022 10am-1pm	4
Total number of attendees:		519

4.5.1.8 A total of 846 pieces of feedback were received as a result of the non-statutory consultation:

- 602 printed feedback forms
- 204 emails
- 40 comments submitted via post via the Freepost MORECAMBE AND MORGAN address.

4.5.2 Summary of responses

- 4.5.2.1 These responses have been structured according to the questions as laid out in the non-statutory consultation feedback form. The feedback form questions related to the Morecambe Generation Assets, Morgan and Morecambe Offshore Wind Farms: Transmission Assets, and Morgan Generation Assets. In total, there were seven questions, with three relevant to Morgan Generation Assets. The questions and responses relevant to the Morgan Generation Assets have been included below. A full list of questions can be found in Appendix C.2.13.
- 4.5.2.2 **Q3. The proposed Morecambe and Morgan generation assets will comprise wind turbines and associated infrastructure within the array areas.**
- Do you have any comments or feedback that could help inform our proposals for developing the generation assets at the two wind farm sites?*
- 4.5.2.3 Consultees sought reassurance about the potential impacts of the offshore generation assets and transmission infrastructure on the fishing industry.
- 4.5.2.4 Some of those responding to the consultation raised concerns about the visual impact of the generation assets and sought reassurance about this. The majority of these concerns related to the increased volume of wind turbines that will be visible from the Isle of Man, if the projects proceed as proposed. Given the level of detail available at the time around distance, there was limited understanding within the feedback over how the different projects would have different visual impacts.
- 4.5.2.5 Of the feedback received, more than half was directly related to shipping routes in the Irish Sea. The key issue expressed was a concern that Morgan Generation Assets might be configured in a way that has implications for the Isle of Man Steam Packet Company's routes between Douglas — Heysham, and Douglas - Liverpool.
- 4.5.2.6 Many consultation responses noted the Isle of Man Steam Packet Company's publicly communicated concerns about navigation of ships sailing through the wind farm corridors, and potential for increases in cancellations in rough weather, due to a lack of open sea room for navigation in this area.
- 4.5.2.7 Concerns about potential associated delays and increases in cancellations were also expressed, and the impacts these might have on passengers and freight to the Isle of Man, and therefore to the island's economy and tourism.
- 4.5.2.8 A significant number of responses also queried whether extra sailing distances might be required as a result of the construction of the windfarms, leading the Isle of Man Steam Packet Company's vessels to use more fuel, and therefore increasing costs, carbon emissions and journey times.
- 4.5.2.9 **Q5. As we develop our proposals, we are looking for opportunities to manage and mitigate potential impacts resulting from the construction, operation and maintenance of the projects, on local residents and communities, where practicable.**
- Do you have any comments that could help us as we develop and refine our proposals? For example, this may relate to the use of the local road network or areas prone to flooding.*
- 4.5.2.10 Consultees were keen to understand how the projects would minimise potential impacts on wildlife and seabirds, both during the construction and operation of the windfarms.

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- 4.5.2.11 Some consultees sought reassurance about the onshore substations, which are not relevant to Morgan Generation Assets.
- 4.5.2.12 **Q6. Do you have any comments on this consultation? For example, feedback on the process, events, supporting materials or methods of engagement.**
- 4.5.2.13 Those responding on issues related to shipping routes to the Isle of Man were keen to ensure that the views of Isle of Man residents were properly understood by the projects. This led to a number of requests in feedback for further consultation on the Isle of Man, and for additional information on the projects to be provided to residents.
- 4.5.2.14 Where consultees commented on consultation materials, the most frequent comment was a request for better representation of other Irish Sea windfarms – both operational and in development – within the consultation materials.
- 4.5.2.15 **Q7. Do you know if there are any local events or areas of cultural, heritage or environmental significance that we should be aware of?**
- 4.5.2.16 Consultees on the Isle of Man were keen for the projects to explore any potential benefits for Isle of Man residents, given that the windfarms were not being constructed in Isle of Man territorial waters.
- 4.5.2.17 Responses to this question focused on the potential impacts of the projects on shipping routes to the Isle of Man. Many expressed concerns about the effect this could have on the island's cultural life, particularly on tourism and associated events on the island. Other responses also focused on potential environmental impacts, particularly on marine animals.

4.5.3 Applicant's response to feedback

- 4.5.3.1 The applicant considered all feedback received and had regard to that feedback as the Morgan Generation Assets project progressed, specifically:
- The Applicant acknowledged the comments and feedback received and noted that, as it developed its plans in more detail, the Applicant would conduct a range of assessments to fully understand the potential impacts the Morgan Generation Assets may have on the environment, ecology and local residents, and specifically around navigation and fishing
 - The Applicant established that potential safety risks for fishing stakeholders (e.g. navigation, snagging of fishing gear) would be assessed as part of the EIA, to allow the Applicant to take appropriate action to mitigate any identified risks
 - A range of assessments would be conducted to understand, the impacts the Morgan Generation Assets may have. These assessments, which would be detailed and consulted on as part of the PEIR, would focus on a range of areas, from visual impact and noise to environment, ecology and traffic/transport. Where necessary, these assessments would be used to propose appropriate mitigation measures
 - The Applicant understands the vital importance of the ferry routes serving the Isle of Man and is working closely with marine stakeholders, including the Isle of Man Steam Packet Company, to ensure any impacts that are identified can be addressed appropriately
 - The Applicant conducted a thorough analysis of vessel traffic survey data, carried out navigational risk modelling, and held a number of meetings and workshops

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to help understand the needs of the Isle of Man Steam Packet Company and develop proposals that consider these needs appropriately

- As a part of the development and EIA process, a range of impact assessments were undertaken to identify the potential impacts of the construction, operations/maintenance, and decommissioning phases of the project. A MCZ Assessment and HRA process were also undertaken including the development of the Information to support the Appropriate Assessment (ISAA) (Document Reference E1)
- The Applicant's Scoping Report (Morgan Offshore Wind Ltd, 2022) outlined how assessments of potential impacts of the wind farm would be approached, including impacts on marine ecology (including marine processes, benthic ecology, fish and shellfish), offshore ornithology and marine mammals
- The identification and assessment of potential environmental impacts was undertaken in consultation with statutory bodies such as the local planning authorities, the EA, The Wildlife Trust, Natural England and the MMO and was specific to the local environmental and social context and baseline
- Alongside energy supply security, the Applicant also noted that offshore wind projects can bring significant benefits to local communities, both in terms of the jobs that will be created and the supply chain opportunities that will be in offer. In particular the Applicant emphasised the important contribution the local supply chain can make to the Morgan Generation Assets
- Using the information on the Morgan Generation Assets website, local companies can pair their skills with the projects' needs. The portals continue to provide access for companies of all sizes to register their interest for future work. The Applicant encouraged any relevant suppliers based on the Isle of Man to register their interest
- The PEIR for the Morgan Generation Assets was published in April 2023. This report provided early information, ahead of a full EIA, to help stakeholders and the local community better understand the potential impacts of the project
- The Applicant consulted extensively on the Isle of Man. A public consultation event was held in the council chamber at the Douglas Borough Council buildings in November 2022, and a postcard was delivered promoting the event and the consultation to business and residential addresses across the Isle of Man. More than 80 people came along to discuss the proposals with the Applicant's project teams in person
- Mapping showing locations of other Irish Sea windfarms – both operational and in development – was provided at the consultation events
- The Morgan Generation Assets consulted at this stage with Morecambe Generation Assets and Morecambe and Morgan Wind Farms: Transmission Assets. However, every effort was made to communicate the Morgan Generation Assets project clearly within the consultation materials and consultees were given the opportunity to respond on this project specifically
- The Applicant is grateful to all those who expressed support for the Morgan Generation Assets during the consultation. Renewable energy is central to supporting the UK's ambitions to lead the world in combatting climate change, reducing our reliance on fossil fuels and embracing a future where renewable energy powers our homes and businesses. The Morgan Generation Assets will

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contribute to this energy transition and to achieving the aims of the UK's Energy Security Strategy.

4.5.4 Landowner engagement

4.5.4.1 The Applicant appointed Dalcour Maclaren to act as its Land Agent and to undertake land referencing, manage communications with identified landowners and arrange access as required. Due to the location of Morgan Generations Assets being entirely within the east Irish Sea, only TCE are required to be consulted for the purposes of Morgan Generation Assets.

4.5.5 Ongoing engagement

4.5.5.1 The Applicant has continued to keep local stakeholders, technical stakeholders, regulators and the community informed of key milestones and important decisions regarding any refinements. Please see section 6 for further information.

5 STATUTORY CONSULTATION

5.1 Introduction

5.1.1.1 As established in section 2 of this report, there are a number of provisions of the 2008 Act which do not apply to Morgan Generation Assets as the DCO application boundary is located wholly within the marine environment, with no onshore infrastructure. There is therefore no 'local authority' to be consulted on a statutory basis in accordance with sections 42(1)(b) and 43. Secondly, the duty under section 47 to consult with "people in the vicinity of the land" does not apply.

5.1.1.2 Notwithstanding this the Applicant strongly believes that consultation is an integral part of the development of the project proposal and therefore, despite there being no statutory requirement to comply with these aspects of the 2008 Act, the Applicant voluntarily conducted consultation in accordance with the principles of both section 43 and section 47 of the 2008 Act.

5.1.1.3 This voluntary consultation was undertaken alongside the statutory consultation that the Applicant was required to undertake under section 42 of the 2008 Act. The Applicant made no distinction between different stakeholders and the information made available to them at this stage of pre-application consultation. As such the consultation undertaken voluntarily and statutorily is fully reported in this section of this report and referred to as statutory consultation hereafter.

5.2 Consultation under section 47 of the Planning Act 2008 (19 April to 04 June 2023)

5.2.1 Legislative context

5.2.1.1 Section 47 of the 2008 Act places a duty on the Applicant to consult the local community in the following manner:

1. *"The applicant must prepare a statement setting out how the applicant proposes to consult, about the proposed application, people living in the vicinity of the land.*
2. *Before preparing the statement, the applicant must consult each local authority that is within section 43(1) about what is to be in the statement.*
3. *The deadline for the receipt by the applicant of the local authority's response to consultation under subsection (2) is the end of the period of 28 days that begins with the day after the day on which the local authority receives the consultation documents.*
4. *In subsection (3) "the consultation documents" means the documents supplied to the local authority by the application for the purpose of consulting the local authority under subsection (2).*
5. *In preparing the statement, the applicant must have regard to any response to consultation under subsection (2) that is received by the applicant before the deadline imposed by subsection (3).*
6. *Once the applicant has prepared the statement, the application must –*
 - (za) *Make the statement available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land.*

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(a) Publish in a newspaper circulating in the vicinity of the land, a notice stating where and when the statement can be inspected.

(b) Publish the statement in such manner as may be prescribed.

7. The applicant must carry out consultation in accordance with the proposals set out in the statement.”

5.2.1.2 For the purposes of Section 47(1) of the 2008 Act, the statement setting how the applicant “proposes to consult, about the proposed application, people living in the vicinity of the land” is known as the SoCC. In respect of subsection (2), consultation with local authorities is important because their knowledge of the local area can helpfully inform decisions on the geographical extent of consultation and the methods that will be the most effective in the local circumstances.

5.2.1.3 As set out above (see section 2.1), there is no provision in the 2008 Act that requires the Morgan Generation Assets to prepare or consult on a Statement of Community Consultation (SoCC). However, a SoCC was prepared voluntarily by the Applicant in line with the principles of the 2008 Act, and the Planning Inspectorate’s pre-application guidance (DCLG Guidance). (Appendix D.1)

5.2.1.4 A draft SoCC must be provided to the local authority, providing information which allows the authority to make an informed response to the draft SoCC consultation. As set out in section 2 of this report, there is no ‘local authority’ to be consulted on a statutory basis in accordance with sections 42(1)(b) and 43, however the Applicant took a pragmatic approach to identifying local authorities and other relevant bodies with whom they consulted on the draft SoCC (please see section 5.2.2.4 below).

5.2.1.5 Section 47(5) of the 2008 Act requires applicants to have regard to any response that is received within the 28-day period.

5.2.1.6 In developing the SoCC, regard must be had to the EIA Regulations 2017 and relevant guidance about pre-application procedure. Regulation 12 of the EIA Regulations 2017 stipulates that the SoCC must set out whether the proposal is EIA development and, if so, how the Applicant intends to publicise and consult on the PEIR.

5.2.1.7 The former DCLG (now DLUHC); Planning Act 2008: Guidance on the pre-application process (March 2015) (DCLG Guidance), Paragraph 57 gives further guidance on the SoCC including that the document should be made available online, and at any exhibitions or other events held by applicants. The SoCC should also be placed at appropriate local deposit points (e.g. libraries, council offices) and sent to local community groups as may be appropriate.

5.2.1.8 Information about the consultations conducted with local authorities on the draft SoCC ahead of its publication (as required by section 47(2) of the 2008 Act) can be found at section 5.2.2. This includes how feedback was considered within the Application.

5.2.1.9 Details of how the Applicant complied with the legislative requirements and guidance regarding the SoCC are set out in the overarching Consultation Compliance Checklist (Appendix B.1). Details of how the Applicant complied with commitments within the SoCC are set out in Table 5.11.

5.2.2 Preparation of the Statement of Community Consultation

5.2.2.1 As set out in the Planning Inspectorate Advice Note Fourteen, the Consultation report should provide evidence of how applicants have complied with the SoCC preparation process. The note also advises that evidence should be submitted which shows which local authorities were consulted about the content of the draft SoCC, what comments

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were received from local authorities, confirmation that they were given 28 days' notice to provide comments, and a description of how applicants have had regard to comments received.

- 5.2.2.2 A SoCC was voluntarily prepared by the Applicant in line with the principles of the 2008 Act, and the Planning Inspectorate's pre-application guidance. In doing so, the SoCC aimed to establish a consultation which was proportionate to the proposals and the related potential environmental effects.
- 5.2.2.3 Section 47(2) of the 2008 Act states that, before preparing a SoCC, applicants must consult with each local authority that is within section 43(1) on what is to be in the statement.
- 5.2.2.4 Taking the pragmatic approach with regard the identification of local authorities upon which to consult the draft SoCC, the Applicant identified 13 local planning authorities. These authorities were identified as host authorities as defined in section 43 of the 2008 Act for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets and/or had the potential to be visually affected by the Morgan Generation Assets and included:
- Barrow-in-Furness Borough Council
 - Blackpool Council
 - Copeland Borough Council
 - Cumbria County Council
 - Douglas Borough Council
 - Fylde Council
 - Isle of Man Government / Territorial Seas Committee (TSC)
 - Lake District National Park Authority (identified as part of the Seascape, Landscape and Visual Impact Assessment (SLVIA))
 - Lancashire County Council
 - Preston City Council
 - South Lakeland District Council
 - South Ribble Borough Council
 - Wyre Council.
- 5.2.2.5 The Applicant also consulted the Marine Management Organisation as a body with an interest in the Morgan Generation Assets.
- 5.2.2.6 At the time of the consultations on the draft SoCC, the Applicant was aware of upcoming changes to local government in Cumbria planned for 1 April 2023, and noted that contact made with soon-to-be dissolved local authorities was forwarded automatically to the new councils of Cumberland and Westmorland and Furness.
- 5.2.2.7 The draft SoCC was the subject of two formal consultations with local authorities. The first of these consultations was undertaken from 15 February to 14 March 2023.
- 5.2.2.8 The second of the draft SoCC consultations was undertaken from 09 March to 06 April 2023. These dates overlap due to changes in the programme determined by the Applicant in spring 2023. Consequently, the start and end dates for the statutory consultation were amended in the second draft of the SoCC.

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- 5.2.2.9 The Applicant therefore issued a second consultation on the draft SoCC, consulting the same list of bodies and organisations that were contacted as part of the first consultation (as set out at 5.2.2.4. It notified those bodies and organisations that a second consultation was taking place on the revised draft of the SoCC and that a further 28 days would be allowed in which to submit comments. Once again, all the bodies and organisations being consulted were contacted via email.
- 5.2.2.10 The two draft SoCCs have been provided at Appendix D.2.1 and D.2.2.
- 5.2.2.11 The Applicant gave regard to the responses received from the local authorities during the consultations in the finalisation of the SoCC. There were no responses received following the first SoCC consultation.
- 5.2.2.12 The responses in Table 5.1 below were received following the second SoCC consultation.

Table 5.1: The Local Authority responses to the second SoCC consultation.

Consultee	Summary of feedback received	Action taken
TSC – responding on behalf of the Isle of Man Government	Clarification would be helpful to understand which events are proposed to take place for the Isle of Man and advanced notice of when they are to take place.	A full list of consultation and pop-up events, including venues and times, was published in the final version of the SoCC. These included two events on the Isle of Man at Ramsey Town Hall and Douglas Borough Council, the dates and times of which were communicated to the Isle of Man Government - and by association the TSC - at the launch of consultation when they received an email announcing the launch of consultation and link to the final version of the SoCC, the consultation brochure and consultation website.
	It would be useful to share a list of stakeholders within the SoCC...to ensure relevant stakeholders have been identified for engagement.	An early list of stakeholders the Applicant planned to consult with was shared with the Isle of Man Government on 15 February 2023 as part of the first SoCC consultation. A number of those listed were ultimately not consulted as they were later deemed not relevant to the proposals. The Applicant consulted extensively with, and received feedback from, stakeholders and stakeholder groups on the Isle of Man.
	Both Ørsted (for offshore wind) and Crogga (hydrocarbon extraction) should be engaged given the location of their sites. It might also be beneficial to add these to the maps contained within the SoCC so that those wishing to engage as part of the consultation exercise can understand other projects within the vicinity of the proposed Mona project (sic).	Ørsted was engaged throughout the consultation process, due to their multiple interests in the area, providing feedback to the public consultation on 02 June 2023. Crogga Ltd was emailed directly on 17 May 2023 informing them of the consultation. The map in the 'Where we will consult' section of the final SoCC was updated from the version shown in draft SoCC. The new map specifically highlighted event venues and deposit locations, as well as marking a zone illustrating where the Applicant planned to consult.
	The TSC would welcome opportunity for continued involvement in the process.	The Isle of Man Government - and by association the TSC - was contacted as part of the consultation and the Applicant continues to engage the Isle of Man Government as a stakeholder.

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Consultee	Summary of feedback received	Action taken
Westmorland and Furness Council	<p>It is advised that the consultation process could be strengthened through the inclusion of an alternative feedback submission process. This could be via the recording of feedback provided in telephone calls to the dedicated phone line or a sensitive yet explicit offer to capture and record feedback from consultees at consultation events.</p>	<p>The process of applying for development consent is predominantly a written process. Accurately interpreting and summarising feedback made verbally is a difficult process to do accurately compared to feedback provided in writing. The Applicant therefore did not make an allowance for formal feedback to be submitted verbally.</p> <p>A dedicated project phone line was made available for callers wanting clarification of the Applicant's proposals or to check details of the consultation process/events etc.</p> <p>Attendees at consultation events were able to complete and submit printed feedback forms while at the events.</p>
	<p>It is suggested that informal consultation activities form a substantial element of the consultation approach and would welcome pop-up events to complement more formal consultation events.</p>	<p>Five pop-up events were held as part of the Applicant's consultation. These were advertised in the SoCC, in the consultation brochure and on the website.</p>
	<p>Details of the number and location of pop up events are not included in the SoCC and the Council would like to review these details before the final issue of the SoCC.</p>	<p>While full details of the pop up events, including venue, address and time, were noted in the final version of the SoCC the council was not provided an opportunity to review these details before the SoCC was published, due to the timescales between the feedback being received and the start of consultation. The Applicant had regard to the feedback received and consulted in Westmorland and Furness.</p>
	<p>Local business input should be sought, and specific consultation activities undertaken. This is particularly important in relation to those businesses operating and/or with interests in the Morecambe Bay and the Irish Sea. Examples within Barrow-in-Furness and west Cumbria include BAE Systems (Submarines), ABP, Ørsted, Spirit Energy, Port of Workington, RWE and Sellafield Ltd however, smaller businesses with similar interests should also be included in the consultation process.</p> <p>In particular, the Local Enterprise Partnership (LEP), Business Improvement Districts and the Chamber of Commerce can act as business representatives and support consultation and engagement with the business community.</p>	<p>Local businesses and business representatives were consulted. These included the Cumbria LEP, regional Chambers of Commerce, ABP, BAE Systems, Ørsted, Spirit Energy, RWE and local port and airport operators.</p>

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Consultee	Summary of feedback received	Action taken
	<p>Formal consultation events in the area would be welcome and suggest that public buildings in coastal town centre locations are identified.</p>	<p>No formal consultation events were scheduled in the region covered by Westmorland and Furness but a pop-up event was held at Barrow-in-Furness Leisure Centre on 11 May 2023.</p> <p>Two locations, including the main Barrow-in-Furness public library and Abbots Vale Community Centre, were used as deposit locations, where printed copies of the SoCC, consultation brochure, PEIR NTS and printed feedback forms could be viewed.</p> <p>A webinar was also held on 03 May 2023 as part of the consultation and was open to anyone to register to attend.</p>

5.2.3 Publication of Statement of Community Consultation

- 5.2.3.1 As required by section 47(6) of the 2008 Act, the SoCC was made available for inspection by the public.
- 5.2.3.2 Printed copies of the SoCC were available to view from 19 April to 04 June 2023 in the following locations. Venues hosting the materials were invited to contact the Applicant if they required any additional copies:
- Abbots Vale Community Centre, Barrow-in-Furness, LA13 9PA
 - Barrow-in-Furness Main Public Library, Ramsden Square, Barrow-in-Furness LA14 1LL
 - Egremont Community Centre, Egremont Mission, Guildford Street, Wallasey CH44 0BP
 - Henry Bloom Noble Library, Douglas Borough Council, Douglas, Isle of Man IM1 2AY
 - Penwortham Town Council and Community Centre, Kingsfold Drive, Penwortham, Preston PR1 9EQ
 - Preston City Council, Town Hall, Lancaster Road, Preston PR1 2RL
 - Ramsey Library, Parliament Square, Ramsey, Isle of Man IM8 1RT
 - Southport Library, Lord Street, Southport PR8 1DJ.
- 5.2.3.3 Newspaper notices (statutory section 47 notices) were published stating where and when the SoCC could be inspected. These appeared in the Blackpool Gazette, the Lancashire Post and the Barrow Mail on 19 April 2023, and the Isle of Man Courier on 21 April 2023. Copies of these notices as they appeared in print are available in Appendix D.3.
- 5.2.3.4 A notice was included within the boxes containing consultation materials, located at the venues above, inviting staff/members of the public to contact the consultation hotline or email address if they required further information about the consultation or wanted to request additional copies of materials.

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5.2.3.5 All materials, including the SoCC, were also available for viewing and download from the Applicant’s consultation website⁴.

5.2.4 Defining the initial mailing and consultation zones

5.2.4.1 Following further technical work and feedback from the non-statutory consultation, a refined mailing zone was created for the statutory consultation, as shown in Figure 5.1 below. The mailing zone also considered the consultation zone as defined in the SoCC, which accounted for coastal communities that may be visually impacted by the Morgan Generation Assets.

5.2.4.2 This zone was defined in part by reference to the search area for the onshore elements of the project, which were being consulted on separately as part of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.

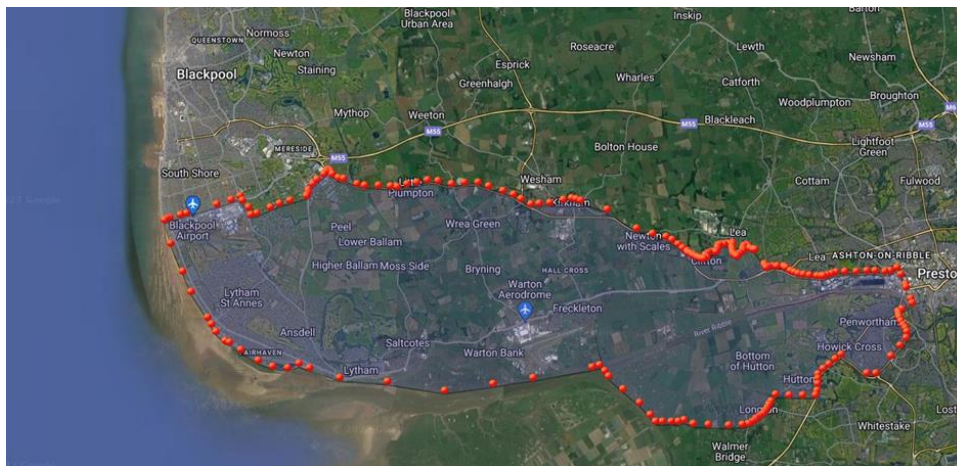


Figure 5.1: Statutory consultation mailing zone – coastal and onshore communities.

5.2.4.3 The mailing zone also accounted for homes and businesses near consultation event venues in areas that may be impacted visually by the turbines themselves, as influenced by the Zone of Theoretical Visibility (ZTV). These zones were identified in Blackpool and Southport.

5.2.4.4 In total, 58,265 postcards were sent to residential and business addresses in these areas, as shown in Figure 5.2, Figure 5.3 and Figure 5.4 below. In addition, all 45,811 addresses on the Isle of Man were also contacted and sent postcards via the Isle of Man Post Office as shown in Figure 5.5 below.

⁴ www.morecambeandmorgan.com/morgan/consultationhub/

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Figure 5.2: Statutory consultation mailing zone – Blackpool south and coastal.

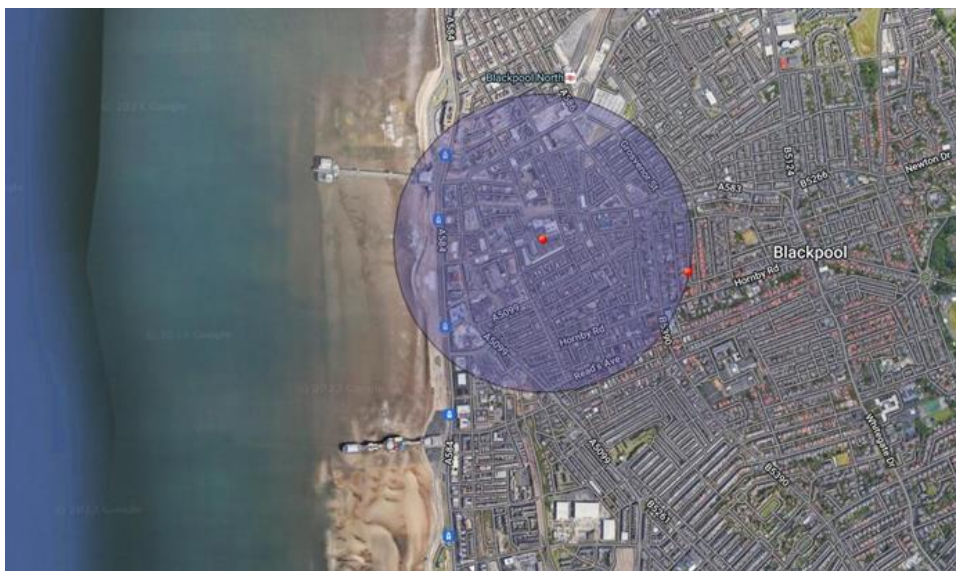


Figure 5.3: Statutory consultation mailing zone – Blackpool venue.

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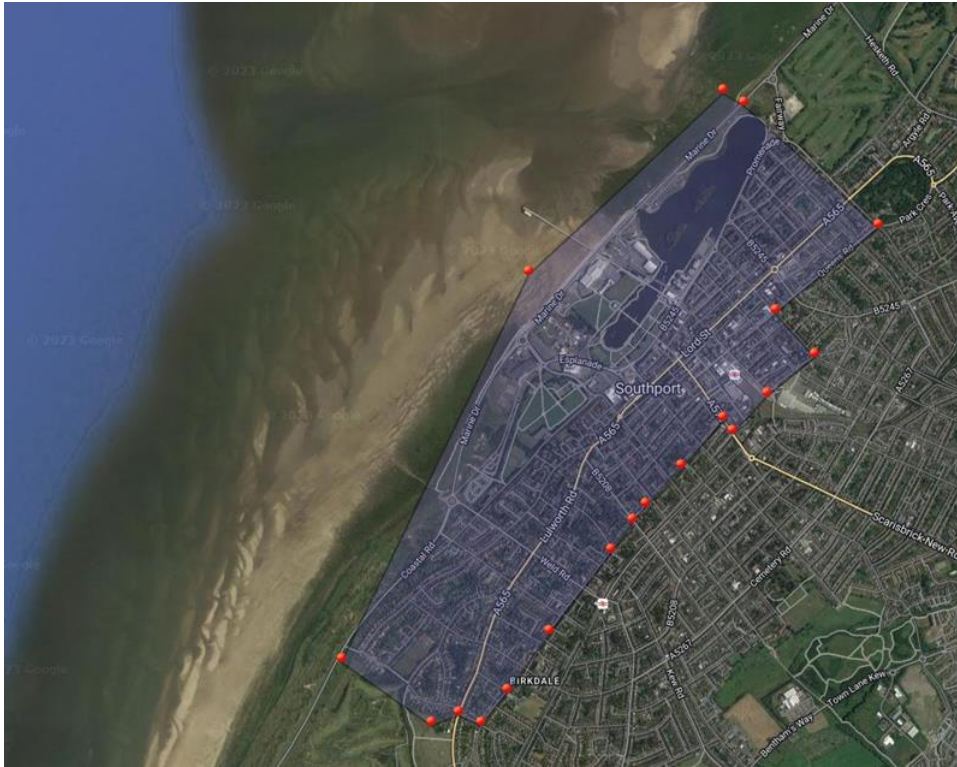


Figure 5.4: Statutory consultation mailing zone – Southport venue.

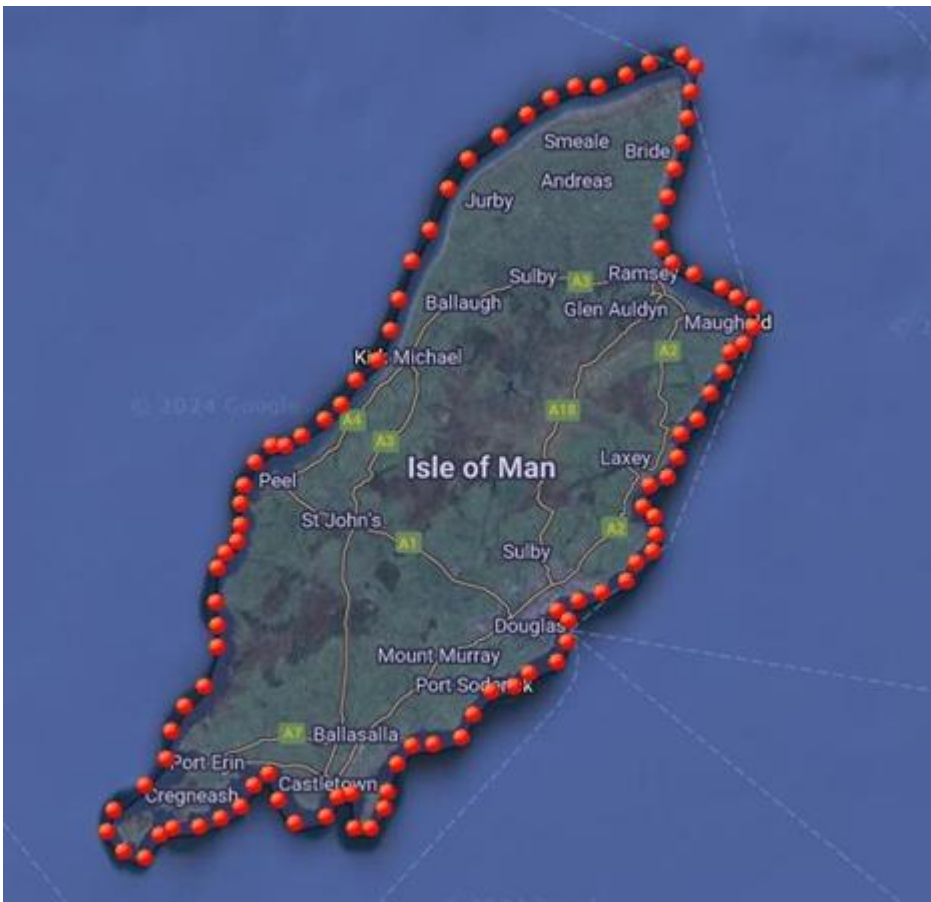


Figure 5.5: Statutory consultation mailing zone - Isle of Man.

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5.2.5 Identification of section 47 consultees

- 5.2.5.1 As set out above at section 2.1.1.3, the Applicant voluntarily prepared a SoCC in accordance with the principles of section 47 of the 2008 Act.
- 5.2.5.2 In total, the Applicant consulted 451 section 47 stakeholders/community groups. This list was defined by identifying interested individuals, organisations and community groups that were active in – or represented communities or groups within - the areas likely to be impacted by the project. This list is provided at Appendix D.4.
- 5.2.5.3 This list considered both community-based groups and political representatives /bodies. It also identified organisations likely to have a professional interest in the project but who had not been categorised as section 42 consultees. These stakeholders were given the opportunity to consider the proposals and provide their feedback on the basis they had been identified as section 47 consultees and did not fall into the section 42, section 43 or section 44 categories.
- 5.2.5.4 The database was compiled by the Applicant based on the groups and individuals already being engaged through other workstreams as well as groups and individuals who had not yet engaged with the project – but should be encouraged to do so. It was also compiled through a consideration of the stakeholders/community groups operating in the vicinity of land covered by the Morecambe and Morgan Offshore Wind Farms: Transmission Assets and potentially impacted visually by the Morgan Generation Assets.
- 5.2.5.5 This section 47 consultees were sent the same range of communications as the groups and individuals being consulted under section 42. Please see the section 5.2.18 'Direct email communication' for more details.

5.2.6 Statutory consultation 19 April to 04 June 2023

- 5.2.6.1 The purpose of statutory consultation was to allow those within the local community who may be affected by the Morgan Generation Assets – or who may have an interest - to consider the proposal and give feedback, as well as to gather information about the local community to help refine the proposals.
- 5.2.6.2 The statutory section 47 consultation coincided with the section 42 consultation, commencing on 19 April 2023 and ending on 04 June 2023.
- 5.2.6.3 Section 47(7) of the 2008 Act states that applicants must carry out consultation on their proposals in accordance with the SoCC.
- 5.2.6.4 The SoCC stated that, throughout the statutory consultation, the Applicant was seeking feedback on its proposals, including on:
- The location for the offshore wind turbines and associated infrastructure
 - How the impacts of the project can be minimised
 - All aspects covered in the PEIR.
- 5.2.6.5 The following sections set out how the section 47 consultation was carried out, in terms of the information that was sent to consultees, the mechanisms employed for making communities aware of the consultation and the virtual and in-person consultation events that were held.

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5.2.7 Materials published to aid engagement with statutory consultation

5.2.7.1 The Applicant consulted using a variety of methods to help explain the proposals and encourage people to provide their comments. Community focused materials included:

- A consultation postcard (see section 5.2.12)
- A consultation website (see section 5.2.10)
- A consultation brochure (see section 5.2.13)
- A feedback form (see section 5.2.20) and
- A PEIR NTS (Morgan Offshore Wind Ltd, 2023).

5.2.7.2 All documents were created to help people understand the proposed development and provide their comments to the consultation. The Applicant aimed to make these documents and resources easy to understand and navigate and, where appropriate, the resources made strong use of images and graphics.

5.2.7.3 A range of technical documents were also published on the website and made available at consultation exhibitions as part of the consultation, including:

- The PEIR, its NTS and annexes
- Location plan(s) (Offshore)
- Works Plan – Offshore
- Indicative Extent of Marine Licences
- Draft Development Consent Order (dDCO) including Draft Deemed Marine Licences and an Explanatory Memorandum.

5.2.8 Deposit locations

5.2.8.1 The Applicant organised for copies of consultation materials, including the brochure, SoCC, PEIR NTS and feedback forms in hard copy to be placed at deposit locations listed in Table 5.2 below. These were available for the duration of the consultation, with locations, dates and times made publicly available on the project website.⁵ These locations were chosen by mapping an even spread across the consultation zone and then narrowing down those thought to have high levels of footfall. These venues were invited to contact the Applicant if they required any additional materials to be sent to them.

5.2.8.2 Opening times, as set out in Table 5.2 below, were sourced from the websites of the venues, where available. Where necessary, opening times were checked by the Applicant by calling the venues. A note was then included within the relevant section of the SoCC suggesting potential visitors to the deposit locations should check opening times with their nearest venues, before visiting.

⁵ www.morecambeandmorgan.com/morgan/consultationhub/

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Table 5.2: Deposit Locations.

Location	Opening Times
Abbots Vale Community Centre, Barrow-in-Furness LA13 9PA	Monday to Friday: 9am to 8pm
Barrow-in-Furness Main Public Library, Ramsden Square, Barrow-in-Furness LA14 1LL	Monday to Thursday: 9:30am to 6pm Friday: 9:30am to 5pm Saturday: 10am to 4pm
Egremont Community Centre, Egremont Mission, Guildford Street, Wallasey CH44 0BP	Monday to Friday: 9am to 4pm
Henry Bloom Noble Library, Douglas Borough Council, Douglas, Isle of Man IM1 2AY	Monday to Wednesday and Friday: 8.30am to 5pm Thursday: 10am to 7pm Saturday: 9am to 4pm
Penwortham Town Council and Community Centre, Kingsfold Drive, Penwortham, Preston PR1 9EQ	Monday to Thursday: 10am to 3pm Friday: 10am to 12pm
Preston City Council, Town Hall, Lancaster Road, Preston PR1 2RL	Monday to Wednesday and Friday: 9am to 5pm Thursday: 10am to 5pm
Ramsey Library, Parliament Square, Ramsey, Isle of Man IM8 1RT	Monday to Thursday and Saturday: 9am to 4:30pm Friday: 9am to 4:00pm
Southport Library, Lord Street, Southport PR8 1DJ	Monday to Friday: 10am to 5pm Saturday: 10am to 2pm

5.2.9 Advertising the statutory consultation

5.2.9.1 In accordance with section 47 and section 48 of the 2008 Act, a series of formal notices (the statutory notices) were placed in local, national and sector-specific media. The titles used and publication dates were as presented in Table 5.3 below:

Table 5.3: Statutory Notice publications.

Section 47	Title	Publication date(s)	Reference
	Blackpool Gazette	19 April 2023	Appendix D.3.1
	Barrow Mail	19 April 2023	Appendix D.3.3
	Lancashire Post	19 April 2023	Appendix D.3.2
	Isle of Man Courier	21 April 2023	Appendix D.3.4

Section 48	Title	Publication dates(s)	Reference
	Barrow Mail	12 April 2023	Appendix D.21.2.5
	Blackpool Gazette	12 April 2023	Appendix D.21.2.6
	Fishing News	12 April 2023	Appendix D.21.2.1

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Section 48	Title	Publication dates(s)	Reference
	Lancashire Post	12 April 2023	Appendix D.21.2.7
	Lloyds List	12 April 2023	Appendix D.21.2.2
	London Gazette	12 April 2023	Appendix D.21.2.3
	The Guardian	12 April 2023	Appendix D.21.2.4
	Isle of Man Courier	14 April 2023	Appendix D.21.2.8
	Barrow Mail	19 April 2023	Appendix D.21.2.5
	Blackpool Gazette	19 April 2023	Appendix D.21.2.6
	Lancashire Post	19 April 2023	Appendix D.21.2.7
	Isle of Man Courier	21 April 2023	Appendix D.21.2.8

5.2.9.2 A variety of different communications channels and tactics were used in order to promote the consultation and encourage the submission of feedback, a summary is provided in Table 5.4 below, with full details in the sections which follow:

Table 5.4: Summary of promotion methods.

Method	Detail	Reference
Consultation Brochure	A brochure was created that provided a summary of the latest proposals and details of the consultation. It was held at deposit locations, distributed at consultation events and available for download via the consultation website	Section 5.2.13 and Appendix D.8
Consultation Postcard	Morgan Generation Assets sent a total of 58,265 postcards to residential and business addresses in the consultation mailing area, and all 45,811 residential and business addresses on the Isle of Man.	Section 5.2.12 and Appendix D.7
Consultation Website ⁶	A dedicated Morgan Generation Assets consultation website, which was also available to access through the Morgan and Mona website on bp's corporate site. ⁷	Section 5.2.10 and Appendix D.6
Direct Email communication	Emails from the project were sent directly to identified consultees.	Section 5.2.18 and Appendix D.12
Local authority briefing	A briefing was offered to Local Authorities for the week commencing 8 May 2023. No local authorities accepted this invitation.	Section 5.2.11
Newspaper Advertising	The project ran two rounds of advertising in local media – one at project launch and one two weeks before the close of consultation, encouraging people to take part.	Section 5.2.15 and Appendix D.10
Online Advertising	Google Ads and Spotify were used to publicise widely to online audiences.	Section 5.2.16 and Appendix D.11
Posters	Posters were produced promoting participation in the consultation and copies were supplied to all deposit locations listed in the SoCC and found in local locations (listed below).	Section 5.2.14 and Appendix D.9

⁶ www.morecambeandmorgan.com/morgan/consultationhub/

⁷ <https://www.enbw-bp.com/morgan-and-mona>

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Method	Detail	Reference
Press releases	News releases were issued to local media during the consultation.	Section 5.2.9 and Appendix D.5
Section 48 notices	Notices were published in a total of eight local, national and trade media titles.	Section 5.6 and Appendix D.21.2
Social Media	The Morgan Generation Assets consultation was promoted on bp UK social media channels (X: @bp_UK and Facebook: bp)	Section 5.2.17

5.2.10 Consultation website

5.2.10.1 A dedicated website for the Morgan Generation Assets, in conjunction with the Mona Offshore Wind Project, was created and went live in 2021.

5.2.10.2 This website was⁸ updated ahead of the of statutory consultation launch on Friday 14 April 2023. The updates included a Morgan-specific page, alongside specific content relating to the Morecambe Generation Assets and the Morecambe and Morgan Offshore Wind Farms: Transmission Assets. The website remains an online repository where people can continue to access all the Applicant's consultation materials and project updates. This dedicated consultation website was also accessible via bp and EnBW's corporate offshore wind website⁹.

5.2.10.3 During the consultation period, there were approximately 8,876 individual users who visited the joint consultation website. The most visited page was the Home Page and the Consultation Hub was the second most visited page.

5.2.10.4 All consultation materials were available to view and download throughout the consultation (including the PEIR and the online feedback form). The website made clear to users how to take part in the consultation and the deadline for feedback.

5.2.10.5 An interactive online map enabled consultees to place pins at specific geographic locations and attach their comments to that pin/location. They were also able to attach documents – such as images – to their pin and comment.

5.2.10.6 Outside of statutory consultation periods, the website remained live and people were still able to make contact and view all documents associated with the project.

5.2.10.7 Screen grabs of the website can be seen in Appendix D.6.

5.2.11 Local authority briefing

5.2.11.1 A specific briefing was offered to local authorities and organisations for the week commencing 08 May 2023. Invitations were issued to the Isle of Man Government, the MMO, and the following local authorities:

- Barrow-in-Furness Borough Council
- Blackpool Council

⁸ www.morecambeandmorgan.com/morgan

⁹ <https://www.enbw-bp.com/morgan-and-mona>

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- Copeland Borough Council
- Cumbria County Council
- Douglas Borough Council
- Fylde Council
- Lake District National Park Authority
- Lancashire County Council
- Preston City Council
- South Lakeland District Council
- South Ribble Borough Council
- Wyre Council.

5.2.11.2 While local authorities were invited to express their interest in a briefing, none did so and a briefing wasn't scheduled.

5.2.12 Consultation postcard

5.2.12.1 All residential and businesses within the mailing zone were sent an A5 postcard by mail. In total, 58,265 postcards were sent to residential and business addresses in this area. In addition, all 45,811 addresses on the Isle of Man were also contacted and sent postcards via the Isle of Man Post Office. The postcard was issued on 19 April 2023 (the start of the consultation period) and included the following information:

- Details of the project being consulted on
- A map displaying the offshore array area for Morgan Generation Assets and infrastructure covered under the Morgan and Morecambe Offshore Wind Farms: Transmission Assets. (offshore cable corridor, landfall point and onshore cable corridor)
- A request for recipients to provide feedback to the consultation
- The dates of the consultation
- The locations of the planned public consultation events
- Contact details for (website, telephone, email, freepost address) so that people could find out more information, provide feedback and/or ask questions. See Appendix D.7.

5.2.12.2 In addition, the postcard also included details of two other consultations that would be taking place simultaneously on separate but inter-related projects. These include the Morecambe Generation Assets statutory consultation, and Morgan and Morecambe Offshore Wind Farms: Transmission Assets non-statutory consultation. These details were provided so that recipients could consider their views in relation to these other projects – in addition to the Morgan Generation Assets – and provide feedback in respect of those other consultations if they wished to do so. Reference was also made to the Mona Offshore Wind Project statutory consultation on the postcard. Recipients were directed to the website for further details.

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5.2.13 Consultation brochure

- 5.2.13.1 A brochure was created that provided a summary of the latest proposals and details of the consultation. It also highlighted how people could take part in the consultation and the deadline for submitting feedback. The brochure was available at consultation events, deposit locations and online on the consultation website, where it could be viewed and downloaded. It was also available in hard copy upon request.
- 5.2.13.2 Shortly after the launch of the statutory consultation on 19 April 2023, the Applicant became aware of several inaccuracies within the consultation brochure. It was considered one of these inaccuracies – relating to the potential impacts of the Morgan Generation Assets on shipping and navigation – needed to be corrected.
- 5.2.13.3 At this point, the brochure had already been uploaded to the project website and placed in deposit locations – but public exhibitions had not started and therefore no wider distribution had taken place. Furthermore, web analytics showed there had been limited visits to the section of the website hosting the downloadable copy of the brochure.
- 5.2.13.4 The Applicant updated and re-published the brochure on 3 May 2023.
- 5.2.13.5 New versions of the brochure were marked with the date they had been updated and a clear notice was added to the inside cover explaining where updates had been made. A new version of the consultation brochure was uploaded to the consultation website and all versions at the deposit locations were replaced.
- 5.2.13.6 The corrected brochure can be seen at See Appendix D.8.

5.2.14 Posters

- 5.2.14.1 The Applicant sent posters for display to venue locations across the Isle of Man and mainland England (Appendix D.9).
- 5.2.14.2 The locations were chosen by mapping a range of local locations where high footfall was likely, using desktop research, as well as including the lists of project reference and event locations. The posters were mailed to a total of 41 locations in England and four locations on the Isle of Man, with a covering letter asking the recipients to display the posters in a convenient location.
- 5.2.14.3 The posters were issued in time to appear on 16 April 2023 for the duration of the consultation period, until 04 June 2023, and the Project collaborated with Morecambe Generation Assets and Morgan and Morecambe Offshore Wind Farms: Transmission Assets. Table 5.5 below details the circulation of posters across Isle of Man and mainland England.

Table 5.5: Poster circulation details

Location	Address
Aldi (Risendale Rd, Barrow-in-Furness)	Aldi, 148 Risedale Rd, Barrow-in-Furness LA13 9RA
Asda Fleetwood Superstore	Asda, Cop Lane, Fleetwood FY7 6NU
Barrow-in-Furness Leisure Centre	Barrow Park Leisure Centre, Greengate St, Barrow-in-Furness, Cumbria LA13 9DT
Blackpool Boat Angling Club	Blackpool Boat Angling Club, Squires Gate Slipway FY1 1SY
Blackpool Central Library	Central Library, Queen Street, Blackpool FY1 1PX

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Location	Address
Blackpool Winter Gardens	Winter Gardens Blackpool, Church Street, Blackpool FY1 1HU
Co-op Food (Parliament St, Ramsey)	Co-op Food, Parliament St, Ramsey, Isle of Man IM8 1AQ, Isle of Man
Douglas Borough Council Town Hall	Town Hall, Ridgeway Street, Douglas, Isle of Man IM99 1AD
Douglas Ferry Terminal	Isle of Man Steam Packet Company, Sea Terminal, Douglas, Isle of Man IM1 2RF
Fleetwood Affinity Shopping Centre	Anchorage Road, Fleetwood, Lancashire FY7 6AE
Fleetwood Library	North Albert Street, Fleetwood, Lancashire FY7 6AJ
Formby Library	Formby Library, Duke Street, Formby, L37 4AN
Fylde Rugby Club	Woodlands Memorial Ground, Blackpool Road, Ansdell, Lytham St. Annes, Lancashire FY8 4EL
Galloways (Preston)	Galloways, 70-72 Lancaster Rd, Preston PR1 1DD
Heysham Ferry Terminal	Passenger Terminal, South Quay, Heysham, Lancashire, LA3 2XE
Hutton Village Hall	Hutton Village Hall, Moor Ln, Hutton, Preston PR4 5SE
Jai's Place (Thorou Goods)	Jai's Place, 101 Liverpool Rd, Hutton, Preston PR4 5SN
Kingsfold Library	Hawksbury Drive, Penwortham, Preston, Lancashire PR1 9EJ
Kirkham Library	Station Road, Kirkham, Lancashire PR4 2HD
Liverpool Ferry Terminal	Landing Stage Terminal, Off St Nicholas Place, Princes Parade, Liverpool L3 1DL
Longton Library	Liverpool Old Road, Longton, Preston, Lancashire PR4 5HA
Lytham Assembly Rooms (including the library)	Lytham Assembly Rooms, Dicconson Terrace, Lytham St Annes FY8 5JY
Morecambe Library	Morecambe Library, Central Drive, Morecambe, Lancashire, LA4 5DL
One Stop (Leyland Rd, Penwortham)	One Stop, 39 Leyland Rd, Penwortham, Preston PR1 9QH
Penwortham Arts Centre 'The Venue'	Penwortham Arts Centre, Liverpool Rd, Penwortham, Preston PR1 9XE
Penwortham Community Library in the Penwortham Youth and Community Centre	Priory Lane Community Centre, Priory Lane, Penwortham, Preston PR1 0AR
Penwortham Methodist Church	Penwortham Bridge Methodist Church, Leyland Road, Penwortham, Preston PR1 9XR
Premier (Trumacar Ln, Heysham)	Premier shop, 1 Trumacar Ln, Heysham, Morecambe LA3 2SY
Roose Library	91-93 Roose Road, Barrow-in-Furness LA13 9RJ
Sainsbury's (Talbot Rd, Blackpool)	Sainsburys, Talbot Rd, Blackpool FY1 3AJ
Sainsbury's Local (Clifton St, Lytham)	Sainsburys, 78-80 Clifton St, Lytham Saint Annes FY8 5EN
Sharoe Green Library	8 Sharoe Green Lane, Fulwood, Preston, Lancashire PR2 8ED

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Location	Address
Southport Boat Angling Club	Southport Boat Angling Club, Ainsdale Beach, Southport PR8 2PZ
Southport Clifton Hotel	Royal Clifton Hotel Southport, Promenade, Southport PR8 1RB
St Stephen's Parish Centre	St Stephen's Parish Centre, Bird Street, Broadgate, Preston PR1 8DY
Tesco Express (Chapel St, Southport)	Tesco, 50-52 Chapel St, Southport PR8 1BZ
Tesco Express (Old Hall St, Liverpool)	Old Hall St Express, A-B, City Exchange, Old Hall St Liverpool L3 9RQ
Tesco Express (Wallasey)	Tesco Express, 15-17 Liscard Village, Liscard, Wallasey CH45 4JG
Tesco Superstore (Douglas)	Tesco Superstore, Lake Rd, Douglas, Isle of Man IM1 5AF
Tesco Superstore (Formby)	Tesco Superstore, Altcar Rd, Liverpool L37 8DP
Trev's Fishing Tackle (Morecambe)	Trev's Fishing Tackle, 48-50, 48 Pedder St, Morecambe LA4 5EA
Waitrose & Partners (Formby)	Waitrose, Three Tuns Ln, Formby, Liverpool L37 4AJ
Wallasey Central Library	Wallasey Central Library, Earlston Road, Wallasey, CH45 5DX
Wallasey Junction One Retail Park	Bidston Moss, Wallasey CH44 2HE
Wallasey Shopping Centre	Cherry Shopping Centre, 6-8 Cherry Square, Liscard, Wallasey CH44 5XU

5.2.15 Newspaper advertising

5.2.15.1 In addition to the publication of the statutory section 47 and section 48 notices, the Applicant published a combination of print and digital advertising to promote the consultation in the publications as detailed at Table 5.6 below:

Table 5.6: Summary of newspaper advertising.

Title	Publication Date(s)	Reference
Blackpool Gazette	19 April and 15 May 2023	Appendix D.10.1
Lancashire Post	19 April and 15 May 2023	Appendix D.10.2
Liverpool Echo	19 April and 17 May 2023	Appendix D.10.3
Isle of Man Courier	21 April and 12 May 2023	Appendix D.10.4

5.2.15.2 These publications were chosen as they provided good geographical coverage of the consultation area.

5.2.15.3 The print advertisement appeared twice, once at the start of the consultation in the week commencing 17 April 2023 and another two weeks before the close of consultation, in May 2023. The first of these adverts advertised the launch of

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consultation, while the second notified of the consultation closing soon, encouraging people to take part (Appendix D.10).

5.2.15.4 The digital adverts on the newspaper sites appeared continuously from consultation launch on 19 April 2023 to consultation close on 04 June 2023. However, halfway through the consultation period, the messaging of these digital ads changed from a 'consultation open' message to a 'consultation closing soon' message.

5.2.16 Online advertising

5.2.16.1 A Google Ads campaign was used to publicise the statutory consultation for the Morgan Generation Assets throughout the entirety of the consultation period. This medium was chosen in acknowledgement of people's tendency to use Google to search for information.

5.2.16.2 The Applicant geotargeted the advertisements to specific locations close to the export cables,' proposed landfall, the projects onshore substation area of search and the exhibition venues being used for the statutory consultation's events.

5.2.16.3 Advertisements, including Google advertisements, were co-placed with Morecambe Generation Assets and Morgan and Morecambe Offshore Wind Farms: Transmission Assets. This decision was taken because Morgan Generations Assets and Morecambe Generation Assets are two very similar projects in similar areas to one another and linked to the Morgan and Morecambe Offshore Wind Farms: Transmission Assets. It was decided that, had these projects not combined their advertising efforts, they would have been advertising at the same time via the same channels to the same audiences. This could have caused confusion and, possibly, consultation fatigue.

5.2.16.4 The Google advertisement was visible throughout the entirety of the consultation period. To increase the effectiveness of the advertisement, the project used two versions: one for consultation launch (Appendix D.11.1) and one to inform people that consultation would soon be closing (Appendix D.11.2). In total, this advertising campaign generated 69,400 impressions and 1670 clicks through to the consultation website. From this landing page, consultees could navigate to either the Morgan Generation Assets website or Morecambe Generation Assets website.

5.2.16.5 The Morgan Generation Assets conducted a joint advertising campaign on Spotify with Morecambe Generation Assets and Morgan and Morecambe Offshore Wind Farms: Transmission Assets. This advertising campaign was targeted at the areas in which in-person exhibition events were being held and was designed to:

- Increase awareness of consultation as much as possible, and in as broad a demographic as possible
- Demonstrate collaboration between the two projects
- Minimise the chance of 'consultation fatigue' among local communities
- Encouraging listeners to access more information online and take part in the consultation.

5.2.16.6 An overview of the Spotify advertising campaign is detailed in Table 5.7 below:

Table 5.7: Morgan Generation Assets Spotify Advertising.

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	‘Consultation Open’ Advertisement (19 April to 17 May 2023)	‘Consultation Closing’ Advertisement (17 May to 4 June 2023)	Total
Total number of people who viewed advertisement	16,330	Total number of people who viewed advertisement	30,331
Clicks to the consultation website	204	Clicks to the consultation website	306

5.2.17 Social media

5.2.17.1 The statutory consultation was also promoted with a post on the X (formerly Twitter) account of bp UK on 19 April 2023 (Figure 5.6). The post attracted 1,173 views. It was also posted on bp UK’s Facebook account.

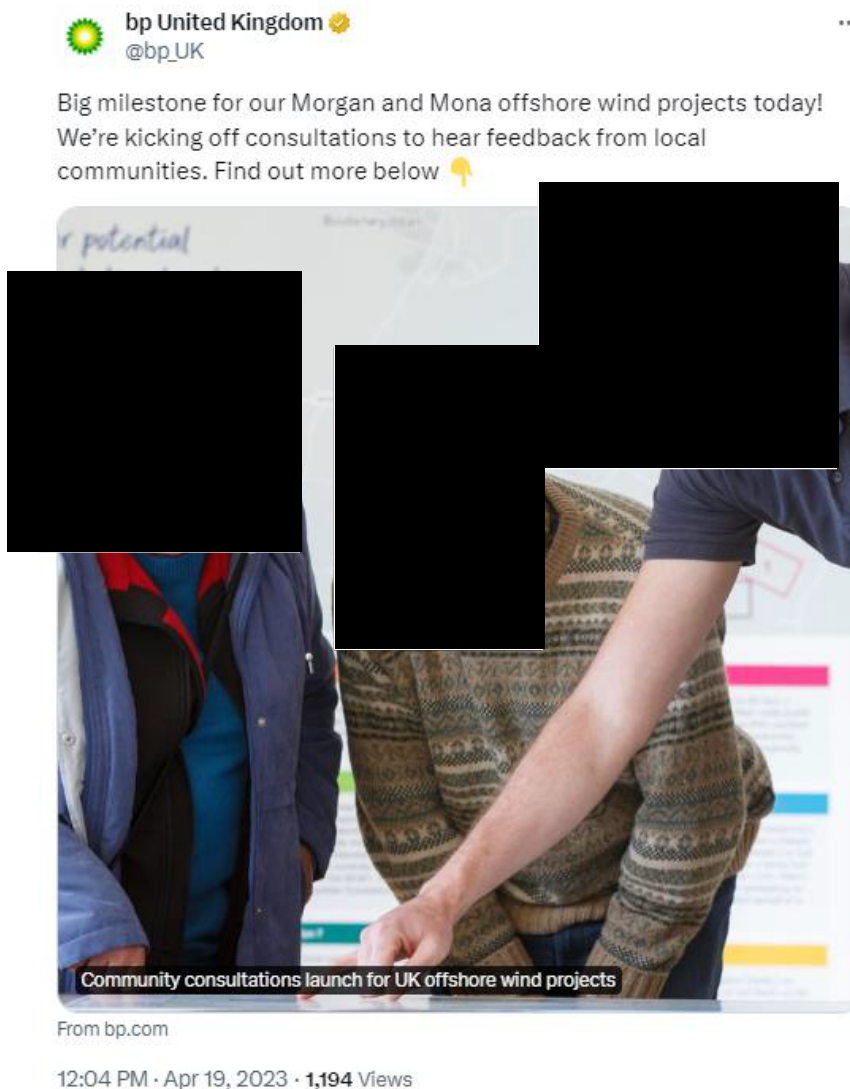


Figure 5.6: Screenshot of post on X (also posted on Facebook).

5.2.18 Direct email communications

5.2.18.1 A series of email communications were issued to promote the statutory consultation, signpost recipients to sources of information and encourage them to give feedback.

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Emails were sent to all identified consultees under both section 42 and section 47. Emails were sent on 14 April 2023 to give advance notice the consultation would be starting and then on 19 April 2023 to formally announce the start of consultation (see Appendix D.12). Table 5.8 provides an overview of the direct email communications to section 42 and 47 consultees.

Table 5.8: Direct email communications to section 42 & 47 consultees.

Date	Subject	Consultee groups issued to	Reference
14 April 2023	Advanced notice of a statutory consultation launching for the Morgan Generation Assets	S42/S47	Appendix D.12.1
19 April 2023	Announcing the launch of statutory consultation	S42/S47	Appendix D.12.2
22 May 2023	A reminder that consultation would be closing soon	S42/S47	Appendix D.12.3
02 June 2023	Last chance to provide feedback	S42/S47	Appendix D.12.4

5.2.19 In person consultation events

- 5.2.19.1 The Applicant ensured that representatives of the project team were accessible to members of the public so they could find out more about the project, ask any questions and/or meet the team in a variety of ways. These public facing opportunities are detailed below.
- 5.2.19.2 A series of 12 public in-person events were held – seven village hall style exhibitions and five of which were ‘pop-up’ events, which are smaller-scale events in areas of high footfall.
- 5.2.19.3 Events were located at accessible and popular public locations. Project materials, including the consultation brochure and feedback forms were available at all events. At the exhibitions a full hard copy of the PEIR was also available for people to view. Events were held at a variety of times throughout the entire week, including weekend and evenings, to increase attendance as much as possible.
- 5.2.19.4 Events held in mainland England were co-hosted with Morecambe Generation Assets, Morgan and Morecambe Offshore Wind Farms: Transmission Assets, and Mona Offshore Wind Project. Events held on the Isle of Man were also co-hosted by all four projects.
- 5.2.19.5 As detailed in section 5.2.9, events were advertised in the SoCC, in the consultation brochure and on the website. Event locations were also publicised in the newspaper adverts, postcard, and poster, with all three noting further details about the events could be found on the project website. A QR code to the website was included in these materials.

Exhibitions

- 5.2.19.6 Six of the exhibitions were held on a weekday, running from 3/4pm to 7/8pm and the seventh was held on a Saturday, running from 10am-1pm.
- 5.2.19.7 Table 5.9 outlines the consultation events held and the number of attendees at each:

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Table 5.9: Summary of event details.

Location	Date	Duration	Number of attendees
Winter Gardens Blackpool 97 Church Street, Blackpool FY1 1HL	10 May 2023	3-7pm	5
Fylde Rugby Football Club Woodlands Memorial Ground, Blackpool Road, Lytham St Annes FY8 4EL	12 May 2023	3-7pm	48
Kingsfold Methodist Church Hawksbury Drive, Kingsfold, Penwortham PR1 9EN	13 May 2023	10am-1pm	4
Ramsey Town Hall, Parliament Square, Ramsey, IoM IM8 1RT	18 May 2023	3-7pm	14
Douglas Town Hall, Ridgeway Street, Douglas, IoM IM99 1AD	19 May 2023	3-7pm	32
Hutton Village Hall Moor Lane, Hutton, Preston PR4 5SE	22 May 2023	3-7pm	13
Royal Clifton Hotel Southport Promenade, Southport PR8 1RB	24 May 2023	4-8pm	3

Pop-up events

- 5.2.19.8 Members of the team held smaller events in areas of expected high footfall in communities likely to be impacted most by onshore and/or visual impacts, to provide information on the project and answer any questions people might have.
- 5.2.19.9 These events were located in areas where people would usually be going about their daily activities and where the Applicant team could be available to engage with anyone who had an interest in the project.
- 5.2.19.10 Four of the pop-up events were held on weekdays, three from 10am-1pm and the other from 3-6pm. Project materials, including the consultation brochure, feedback form and PEIR NTS were available and people were able to submit feedback. Table 5.10 outlines the consultation events held and the number of attendees at each.

Table 5.10: Pop-Up Event details.

Location	Date	Duration	Number of people engaged
Barrow Park Leisure Centre Greengate Street, Barrow-in-Furness LA13 9DT	11 May 2023	10am-1pm	17
Affinity Outlet Shopping Lancashire Anchorage Road, Fleetwood FY7 6AE	23 May 2023	10am-1pm	25
Preston Market 28 Market Street, Preston PR1 2AR	24 May 2023	10am-1pm	12

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Location	Date	Duration	Number of people engaged
Waitrose & Partners Formby Three Tuns Lane, Formby, Liverpool L37 4AJ	25 May 2023	10am-1pm	25
JunctionONE Retail Park Bidston Moss, Wallasey CH44 2HE	25 May 2023	3-6pm	7

Webinar

- 5.2.19.11 For those who could not make it to an in-person event, the Applicant hosted an online event via Zoom. This comprised a presentation from members of the Project team, explaining different elements of the Project's proposals, followed by a question-and-answer session. The online event took place between 6-7pm on Wednesday 03 May 2023 and was attended by eight people.
- 5.2.19.12 This was publicised in consultation materials (including the consultation brochure, the website and the SoCC) and people were able to register online.
- 5.2.19.13 A recording of the online event was uploaded to the Project consultation website the next day (Thursday 04 May 2023). A recording of the webinar remains available to view on the consultation website¹⁰. The presentation can be seen at Appendix D.13

5.2.20 How could people have their say?

- 5.2.20.1 Respondents were able to submit feedback in a variety of ways during the consultation period:
- Feedback map – an interactive map, illustrated in Figure 5.7 below, of the proposals presented during the statutory consultation, allowing people to drop a pin and leave comments online and/or attach files (such as document or images) to their feedback. This image shows a screenshot of the interactive map as it appeared on the consultation website during the consultation
 - Feedback form (see Appendix D.15) – available on the consultation website and could be completed online or downloaded and returned by freepost. Printed copies of the form were also available at consultation events, deposit location, or by request from the consultation team. People could submit feedback by filling in the printed form and submitting it at a consultation event or using the freepost address. It was also available to complete online
 - By email – to the project's dedicated email inbox¹¹
 - In writing – to the project's freepost address, Freepost MORGAN.

¹⁰ <https://morecambeandmorgan.com/morgan/consultationhub/>

¹¹ info@morganoffshorewind.com

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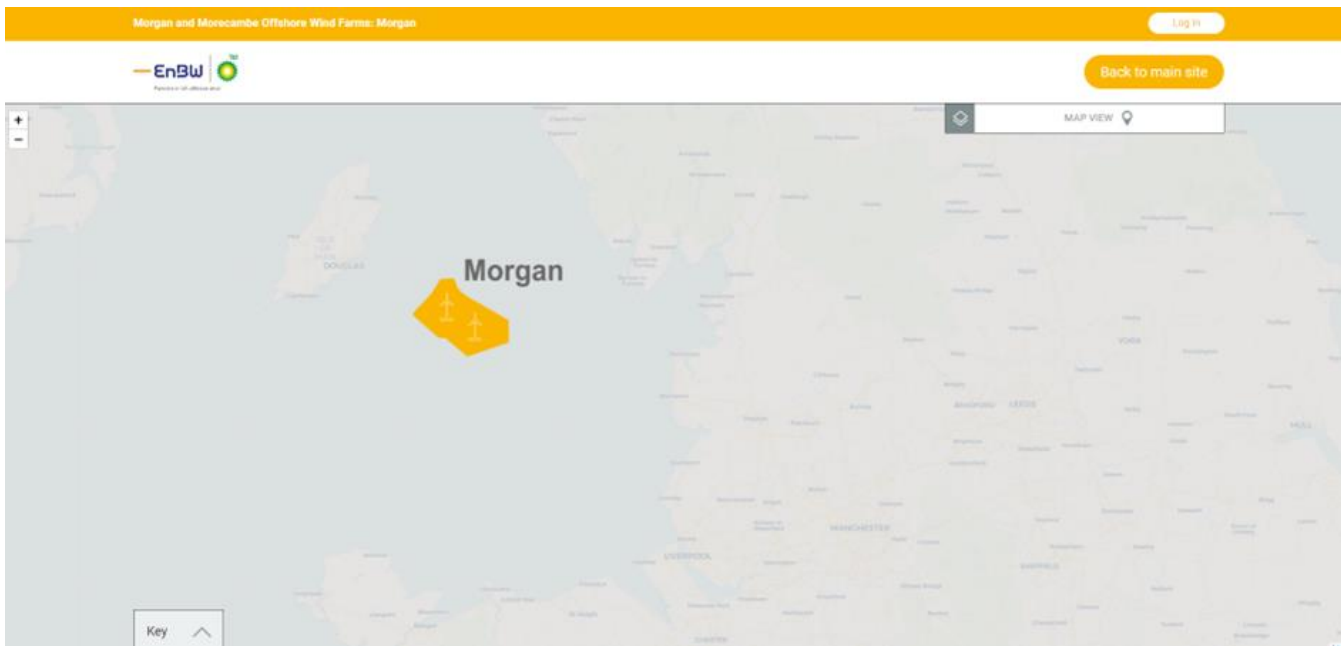


Figure 5.7: Interactive Feedback Map Screenshot.

5.2.20.2 Everyone who provided contact details with their submitted comments received an acknowledgement that their feedback had been received. Feedback successfully submitted via the consultation website or by email received an automatic confirmation. Those submitting feedback in writing received an acknowledgement by post. The SoCC stipulated that, while the Applicant would not be able to respond individually to every question, the themes and issues raised during the consultation would be summarised in the Consultation report.

Contact via Telephone

5.2.20.3 The Morgan Generation Assets project had a dedicated phone line, open 9am-5pm Monday to Friday, and members of the public could leave a message if nobody was able to answer. Calls were returned on the same day, where possible or on a Monday if a message had been left over the weekend.

5.2.20.4 Two calls were received during the consultation period and information was provided to callers and/or materials (USBs, consultation brochures, feedback forms) were sent by post where requested. No feedback was formally submitted by phone.

5.2.21 Compliance with Statement of Community Consultation

5.2.21.1 As set out in Advice Note Fourteen, the Consultation report should provide evidence of how applicants have complied with the published SoCC.

5.2.21.2 As Morgan Generation Assets has no onshore infrastructure, there is no requirement to prepare a SoCC under section 47 of the 2008 Act. However, the Applicant strongly believes consulting with people who may be affected by Morgan Generation Assets is an important part of the DCO planning process.

5.2.21.3 Therefore, in accordance with section 47(7) of the 2008 Act, consultation was carried out in accordance with the proposals set out in the SoCC.

5.2.21.4 The following statutory requirements have been fulfilled during the statutory section 47 consultation:

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- A draft SoCC (Appendix D.2) was prepared which sets out how the Applicant proposed to deal with the relevant local authorities in whose area the proposed development lies (section 47(2))
- The Applicant conducted two statutory consultations on its draft SoCC with the relevant local authorities (see section 5.2.2). In each case the Applicant allowed a period of 28 days for responses (section 47(3))
- The draft SoCC consultation comprised sending the document (section 47(4)) with a covering email which set out information regarding the formal consultation process and the date by which feedback was required
- The Applicant considered all relevant responses received on the draft SoCC (section 47(5)) (see Table 5.1)
- Notice of the final SoCC was published in local newspapers (the Blackpool Gazette, the Lancashire Post, Liverpool Echo and the Isle of Man Courier), and copies of the final SoCC were made available on the consultation website and at local deposit locations (section 47(6))
- The consultation process was carried out in accordance with the SoCC (section 47(7)) and a Consultation Compliance Checklist, including how the SoCC commitments have been complied with, is contained in Appendix B.1 of this document
- The SoCC stated that the application comprised EIA development and described how the Applicant intended to publicise and consult on the PEIR (Regulation 12 of the EIA Regulations 2017).

5.2.21.5 Compliance with each commitment set out in the SoCC is established in Table 5.11 below.

Table 5.11: Compliance with Morgan Generation Assets SoCC.

Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
1.1 / p3	This SoCC therefore sets out how the Project proposes to consult with those that may be affected by our proposals during the preapplication phase, in accordance with the principles of the Planning Act.	A Statement of Community Consultation was prepared and published.	Section 5.2.2
1.1 / p3	We have publicised this SoCC through public notices in the Blackpool Gazette and the Lancashire Evening Post, as the newspapers serving the closest coastal communities to the Project.	The section 47 notice appeared in the Blackpool Gazette, Lancashire Evening Post, Barrow Mail on 19 April 2023 and the Isle of Man Courier on 21 April 2023.	Section 5.2.3 and Appendix D.3
1.2 / p3	All of the feedback we receive will be logged and responses will be provided as a part of the Consultation report to be submitted with the final application.	All feedback received has been logged and responded to as part of the Consultation report.	Section 5.8 and Appendix D.24

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
1.2 / p3	We are committed to delivering an open, constructive, collaborative and solutions-focused consultation, listening to our stakeholders and engaging with respect and integrity.	Statutory consultation was held 19 April to 04 June 2023 with events in-person and online, with viable contact methods available throughout inc. phonenumber, project inbox, and freepost address.	Section 5.2.6 to 5.2.20
3 / p7	The Project notifies consultees (in accordance with sections 42 and 48 of the Planning Act) on its proposed application, following earlier non-statutory consultation.	An email was sent on 19 April 2023 to all consultees identified under section 42 and section 48 of the 2008 Act.	Section 5.2.18
3 / p7	The project will review the feedback received during the consultation and finalise the proposals, taking this feedback into account.	All feedback received has been logged and responded to as part of the Consultation report.	Section 5.8 and Appendix D.24
3.1 / p8	The application for development consent will therefore be accompanied by an Environmental Statement containing the results of the EIA.	The Environmental Statement was submitted with the DCO.	Document Reference F1 to F4
3.1 / p8	The PEIR is a key part of this consultation and will be published in full on the consultation website www.morecambeandmorgan.com/morgan	The PEIR was published in full on our website when the statutory consultation launched on 19 April 2023. It remains on there for people to view.	Section 5.2.10
4.1 / p10	<p>The Project has sought the views of the following, on the consultation strategy provided within this SoCC:</p> <ul style="list-style-type: none"> Marine Management Organisation – in relation to potential impacts arising from the construction, operation and maintenance and decommissioning of the generation assets' offshore infrastructure on the environment and to commercial fisheries and other sea users Local planning authorities – from where the turbines may be viewed, based on a preliminary identification of a worst-case impact area for the Seascape, Landscape and Visual Impact Assessment (SLVIA). This includes coastal local planning authorities along with the local planning authorities potentially affected by the Transmission Assets (<i>the subject of a separate DCO application</i>). 	The Applicant contacted 13 local planning authorities and the MMO on 15 February 2023 as part of the initial draft SoCC consultation to seek their views on the consultation strategy provided in the SoCC. Due to a change in consultation dates, The Applicant restarted the SoCC consultation on 09 March 2023 and ran it until 06 April 2023. There were two responses received on the second draft SoCC consultation.	Section 5.2.2

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.1 / p10	Where the Project may give rise to additional impacts which become apparent through the development process, additional and targeted consultation will be undertaken with those people and communities who could potentially be affected.	The Applicant extended consultation for online feedback respondents whose response to PEIR question 1.14 may have been missed. This consultation ran from 25 August to 25 September 2023 and respondents were contacted via email and post.	Section 5.4.2
4.1 / p10	As well as directly engaging these groups during our statutory consultation, we will also contact a wide range of elected representatives in the areas which may be affected by SLVIA. In line with our approach to the 2022 non-statutory consultation, we will consult with local authorities, councillors, parish councils and parliamentarians.	Local authorities, councillors, parish councils and parliamentarians were contacted as part of the consultation launch and update emails.	Sections 5.2.18, 5.3.5, and 5.3.8
4.1 / p10	We will also engage with the general public, encouraging participation through a combination of advertising and consultation events as detailed in sections 4.5 and 4.6 of this SoCC.	See SoCC sections 4.5 and 4.6 (below) for details of promotional activity conducted.	Section 5.2.9
4.1 / p10	<p>We also recognise that there are groups and individuals that may have difficulties taking part in the consultation process for a range of reasons. We made efforts to consult with these seldom heard groups and communities during our non-statutory consultation and will do so again in our statutory consultation.</p> <p>We will engage with these consultees directly and will be inviting them to comment on our proposals during the consultation.</p>	<p>Through desktop research, a representative range of community groups were identified to help reach stakeholders typically defined as 'hard to reach'. The Applicant contacted 20 SHGs on 14 April 2023 with advanced notice of the consultation, and on 19 April 2023 informing them of the consultation launch.</p> <p>No specific requests were made by SHG regarding how the consultation was conducted.</p> <p>In response to the SoCC consultation, Westmorland and Furness Council requested that the public consultation was made as accessible as possible by providing alternative methods for giving feedback, such as taking feedback over the phone or at events. The Applicant provided opportunities to submit feedback at consultation events, as well as online, and operated a phone line to help applicants in their submission of feedback where needed.</p>	Section 5.2.20 and 5.2.22

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.1 / p10	<p>We'll look carefully at all of the feedback we receive, and this will be considered to help finalise our proposals ahead of our application.</p> <p>All the feedback we receive will be summarised in our Consultation Report, which will be an important part of our application for development consent.</p>	All feedback received has been logged and responded to as part of the Consultation report.	Section 5.8
4.2 / p10	Our statutory phase of consultation will begin following the publication of this SoCC. This follows our non-statutory consultation in 2022.	Statutory consultation launched on 19 April 2023 following the publication of the SoCC, which was made available on our website on 19 April 2023 and can still be reviewed. It was also available to review at several local deposit/reference locations throughout the consultation period.	Section 5.2.3
4.2 / p10	<p>Our approach to engagement and consultation is to seek general feedback on the proposals, including specific focuses on:</p> <ul style="list-style-type: none"> The location for our offshore wind turbines and associated infrastructure How we can minimise the impacts of our project Our Preliminary Environmental Information Report. 	The feedback form was structured along these lines to seek feedback on impacts (questions 3, 4, 5), location (question 2), and the PEIR (question 1). The Applicant made maps of the project available in print and online, and asked people to provide feedback on location using consult online.	Sections 5.2.10 and 5.2.20, and Appendix D.15
4.3 / p11	The statutory consultation will run from 19 April 2023 to 04 June 2023.	The consultation website launched 19 April 2023 with the published SoCC. We sent out emails confirming this. Our consultation materials and notices publicised the dates of consultation. The Applicant closed the consultation website after 04 June 2023 and have used a post-consultation website since.	Sections 5.2.6 and 5.2.9
4.4 / p11	We will hold public consultation events in the coastal communities that may be visually impacted by the Morgan Generation Assets.	The Applicant held joint consultation events which also presented information relating to the Morecambe Generation Assets and the Morgan and Morecambe Offshore Wind Farms: Transmission Assets. These events were held in Blackpool, Lytham, Southport, and in Ramsey and Douglas on the Isle of Man. Events were also held inland in Hutton and Penwortham.	Section 5.2.19

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
		<p>Areas that may be visually impacted were determined using the ZTV as detailed within the SLVIA. The SLVIA assessment was conducted ahead of the consultation and formed part of the PEIR for the Project.</p>	
4.4 / p11	<p>Consultation materials will be distributed in public places in these communities.</p>	<p>The Applicant delivered consultation materials (including feedback forms, brochures, PEIR NTs, and SoCCs) to six deposit locations in England (two in Barrow-in-Furness, and one each in Preston, Penwortham, Southport, and Wallasey) and two on the Isle of Man (Douglas and Ramsey), with these venues chosen in areas of high footfall. Photos were taken of the materials at these venues.</p> <p>These venues were invited to contact the Applicant if they required any additional materials to be sent to them, although no additional replenishment was requested.</p>	Section 5.2.8
4.4 / p11	<p>We will promote the consultation through advertising and press releases in local newspapers that serve these communities.</p>	<p>The Applicant ran two rounds of print advertisements in the four local papers (the Blackpool Gazette, Lancashire Post, Isle of Man Courier and Liverpool Echo) as well as Google and Spotify adverts online.</p> <p>Press releases were issued to 16 local and regional media outlets and were published by local media outlets such as Isle of Man today and Manx Radio.</p>	Sections 5.2.9 and 5.2.15
4.5 / p12	<p>We will consult using a variety of methods to help explain our proposals and encourage people to provide their comments.</p> <p>These materials will help people to understand the proposed development and provide their comments to the consultation. They will be easy to follow, use plain English and, where appropriate, make strong use of images and graphics.</p>	<p>A website, postcards, brochures and feedback forms were published that were easy to follow, used plain English, and made strong use of images and graphics.</p>	Sections 5.2.7 and 5.2.20, and Appendix D.6, D.7, D.8 and D.15

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.5 / p12	<p>Consultation postcards – this A5 dual sided postcard will be sent to all residential and business addresses in the vicinity of the public consultation events. It will highlight the consultation dates and clearly explain where further information can be found, with a focus on encouraging people to visit the website or contact us via the project information channels. Details of the consultation exhibition events will also be included.</p>	<p>An A5 postcard was sent out to 58,265 addresses in the vicinity of consultation events. The postcard, which was sent to a consultation zone including all residential and business addresses in the vicinity of consultation events, highlights the consultation dates and clearly explains where information can be found.</p> <p>Details of the events were not published on the postcard, but the postcard map referenced event locations, and a QR code linked to details of the events online.</p>	Section 5.2.12 and Appendix D.7
4.5 / p12	<p>Website – the project website will be the main public source of information and will be updated to explain the latest proposals. The website will make clear how people can take part in the consultation and what the deadline for feedback is. It will include an interactive feedback map of the proposals and a feedback form. All project materials will also be available on the website.</p>	<p>The website was published for public consultation. The deadline for feedback was clearly stated and makes clear how people can take part via events and providing feedback.</p> <p>The website included an interactive feedback map, a feedback form, and project materials.</p>	Section 5.2.10
4.5 / p12	<p>Consultation brochure – this brochure will provide a summary of the latest proposals and details of the consultation using easily accessible, plain English. It will make clear how people can take part in the consultation and what the deadline for feedback is. The brochure will be available at consultation events, on request from the project team and made available on the website</p>	<p>A brochure was published for consultation which provides a summary of the latest proposals and details of the consultation using easily accessible plain English. It made clear how people can take part in the consultation on the 'have your say' section of the brochure, and what the deadline for feedback is. The brochure was available at consultation events, on request, and made available on the website.</p>	Section 5.2.13 and Appendix D.8
4.5 / p12	<p>Feedback form – this questionnaire will provide an easy way for people to record and submit their feedback. People will be able to submit feedback by filling in the printed form, or visiting our project website and completing the form online.</p> <p>The feedback form will be designed to encourage people to provide feedback specific to our proposals and also to provide wider feedback in relation to the proposed development. Forms will be available at our public consultation exhibitions and online.</p>	<p>Both a printed and online feedback form were available to provide feedback on specific areas and our proposals more widely. Feedback forms were also available at our consultation events.</p>	Section 5.2.20 and Appendix D.15

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.5 / p12	A range of other materials, including the PEIR, will also be made available to help people better understand our proposals and provide us with their feedback.	The PEIR was published on our website along with other materials for consultation. These were also made available at our events, as are evidenced in photos.	Section 5.2.7
4.5 / p13	<p>To give local people the opportunity to meet the project team, better understand the proposals and ask any questions they may have, public consultation exhibitions will be held in the communities which may be directly affected by these proposals. We will decide which communities to engage based on the feedback to our non-statutory consultation.</p> <p>Two types of events will be held:</p> <ul style="list-style-type: none"> • Consultation events – a series of public events for people to visit and meet the project team, find out about the project and ask any questions they might have • Pop-up events – members of the team will be out and about in the communities, to provide information on the project and answer any questions people might have. These events will be located in areas where people are going about their daily activities such as supermarkets, leisure venues and transport hubs. 	<p>The consultation and pop-up events proposed in the SoCC were all held from 10 May to 25 May 2023 and in the areas that may have been affected by SLVIA. Events were held at all venues set out in the tables on page 13 of the SoCC.</p> <p>Pop-up events were held in local areas that may be impacted in locations we ascertained would have high footfall. Locations included shopping centres and markets as well as a leisure centre.</p> <p>The Applicant logged and assessed feedback from the non-statutory consultation, which also informed our events.</p>	Sections 5.2.19, 4.5.2 and 4.5.3
4.5 / p13	The [consultation] events will be located at accessible public locations. Project materials will be available at the event and people will be able to submit feedback.	<p>We held events in public areas such as village and town halls, churches, and hotels. All seven consultation events and five pop-up events were held as advertised.</p> <p>We risk assessed venues beforehand to ensure they were accessible.</p> <p>Project materials were available and displayed at the events, and there were feedback forms available for submission via post or at the event itself.</p>	Section 5.2.19
4.5 / p13	The [consultation] events are drop-in events, meaning you can come along at any time between the hours stated below. There will be printed materials and members of the project team there for you to talk to and find out more	Events were set-up with panels and maps so that those attending could look at the available information, and drop in/out, at their leisure – as evidenced in photos. Printed materials and members of the project team were available at these events.	Section 5.2.19

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.5 / p13	These are smaller-scale events in areas of high footfall, but still a great way to meet the project team and ask any questions you may have.	<p>Pop-up events were held in areas that would have a high footfall. These locations were selected in areas receiving high footfall where people would be going about their daily activities, such as shopping centres, leisure centres and transport hubs.</p> <p>Members of the project team were on hand at these events to answer questions.</p>	Section 5.2.19
4.5 / p13	The events, which will be publicised in the postcard, via print and online advertising and on the project website, will be held at the locations and times listed here.	<p>The consultation and pop-up events were publicised in the postcard, which was sent to all residential and business addresses in the vicinity of consultation events, and our print advert via a QR code. The Spotify and Google adverts online directed listeners to the website, which had further information on the events.</p> <p>The events were held at the times and locations listed.</p>	Section 5.2.9 and Appendix D.7 Appendix D.11 Appendix D.6
4.5 / p14	We will also hold an online webinar. This will be publicised in consultation materials and people will be able to register online. The webinar will consist of an overview presentation about the project and a Q&A session, with a range of project team members available to answer questions.	<p>A webinar was held on 03 May, with a recording of the event available on our website. People were able to register online beforehand via the website.</p> <p>The webinar was publicised on our website and in our brochure.</p> <p>An online presentation and Q&A session were held, with a range of project team members available to answer questions.</p>	Section 5.2.19 and Appendix D.13
4.5 / p14	It is our preference to hold a range of in-person and online events. But in the event that we are unable to hold events in-person (for example as a result of extreme weather or new Covid restrictions), we will make alternative arrangements to deliver a larger, broader range of online consultation events.	Events were held in-person and online. There were no adverse situations that impacted event timing and location.	Section 5.2.19

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.5 / p14	Deposit Locations: These are publicly accessible venues where printed copies of the SoCC, consultation brochure, PEIR, NTS and feedback form can be viewed.	<p>The Applicant delivered consultation materials (including feedback forms, brochures, PEIR NTSs, and SoCCs) to six deposit locations in England (two in Barrow-in-Furness, and one each in Preston, Penwortham, Southport, and Wallasey) and two on the Isle of Man (Douglas and Ramsey). These locations are listed on page 14 of the SoCC. The PEIR was delivered on USBs, so that members of the public could take them home to review at their convenience. Photos were taken of the materials at these venues.</p> <p>These venues were invited to contact The Applicant if they required any additional materials to be sent to them, although no additional materials were requested by the venues.</p>	Section 5.2.8
4.5 / p14	Printed copies of our SoCC and our consultation brochure will be available to view at the following locations. Please call your nearest venue to check the most up to date opening times.	As above. Materials were sent to all locations listed in the SoCC, as evidenced in photos.	Section 5.2.8
4.5 / p14	The project will operate a freephone enquiry line answer phone service during the consultation. People will be able to leave a message and a member of the project team will respond swiftly.	The project operated a freephone line for the consultation, which continues to be in operation.	Section 5.2.20
4.5 / p15	Online Event: If you can't make it along to an in-person event, you can register to attend our online event from 19 April 2023 by scanning the QR code below, or visiting www.morecambeandmorgan.com/morgan . This event will include a presentation by the project team and a question-and-answer session. This online event will take place on Zoom.	<p>A webinar was held on 03 May 2023, with a recording of the event available on our website. People were able to register online beforehand via the website. People were also able to register by scanning the QR code used in our publicity and consultation materials, including the brochure and SoCC. The webinar was held on Zoom.</p> <p>An online presentation and Q&A session were held, with a range of project team members available to answer questions.</p>	Section 5.2.19 and Appendix D.13

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.6 / p16	Advertising – the project will run two rounds of advertising in local media –in advance of the launch and close of consultation, encouraging people to take part. This will consist of print advertising in newspapers in circulation in appropriate local planning authorities, for example relevant coastal authorities. We will also advertise online, using local media platforms.	The Applicant ran two rounds of print advertisements in the four local papers (the Blackpool Gazette, Lancashire Post, Isle of Man Courier and Liverpool Echo) as well as Google and Spotify adverts online.	Section 5.2.9 and Appendix D.10 and Appendix D.11
4.6 / p15	Press releases – news releases will be issued to local media during the consultation. A press release will be issued at the start of consultation and another two weeks before the close of consultation, encouraging people to take part.	Press releases were issued to 16 local and regional media outlets and were published by local media outlets such as Isle of Man today and Manx Radio. A consultation launch press release was published. A consultation closing press release was published and issued.	Section 5.2.9 and section 5.2.15, Appendix D.5
4.6 / p15	Social media – promoting the consultation on social media channels that are owned and managed by Morgan Generation Assets.	bp announced the launch of consultation on Facebook, with bp United Kingdom tweeting the launch of the consultation on Twitter. The project does not have its own separate social media pages.	Section 5.2.17
4.6 / p15	Public notices – the project will also take out public notices in local and national newspapers, in accordance with the principles set out in the by the Planning Act.	The section 47 notice appeared in the Blackpool Gazette, Lancashire Evening Post, Barrow Mail on 19 April 2023 and the Isle of Man Courier on 21 April 2023.. Section 48 notices were published in The Guardian, Lloyds List, Fishing News, the London Gazette and four local news outlets.	Section 5.2.3 and Appendix D.3 and D.21.2
4.6 / p15	Posters – will be printed and issued for display via relevant local planning authorities venues hosting events and to other local venues such as supermarkets, shops and libraries.	Posters were sent to venues where we hosted events, deposit locations, and to other local venues such as supermarkets, shops and libraries. Posters that were mailed out to the locations were put on display, as shown by photographic evidence.	Section 5.2.14 and Appendix D.9

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.6 / p15	<p>Letters – will be sent to key stakeholders including local councillors, inviting them to take part and to encourage others to do so. Letters will also be sent to other relevant interest groups and local community organisations.</p>	<p>A letter was sent in the form of a launch email at the start of consultation informing key stakeholders such as councillors, as well as relevant interest groups and local community organisations.</p> <p>The 71 stakeholders who had not opened any of the three emails sent about the consultation were also sent a letter to extend their period of consultation by an extra 28 days to give them the opportunity to respond.</p>	Section 5.2.18
4.7 / p16	<p>To allow people to engage with the consultation at their own convenience, the project has designed a 'digital first' consultation. This allows people to take part even if they cannot attend a consultation event.</p> <p>The online webinar will be open to anyone to attend and ask questions of the project team.</p> <p>All information will be available on the website and people are encouraged to submit feedback using the online feedback map or online feedback form.</p> <p>People will be able to ask questions and find out more by calling the enquiry line or using the freepost or email addresses.</p>	<p>The Applicant delivered a 'digital first' consultation through extensive use of digital and online methods.</p> <p>A webinar was held on 03 May 2023, with a recording of the event available on the website. People were able to register online beforehand via the website. The webinar was held on Zoom.</p> <p>An online feedback form and consultation map were accessible on the consultation website.</p> <p>The project operated, and continues to operate, a freephone, freepost and email inbox throughout the consultation.</p>	Sections 5.2.19 and 5.2.20
4.7 / p16	<p>For those who are less comfortable engaging digitally, we have developed the consultation to be accessible and this has played an important role in planning consultation activities.</p> <p>Community events will be held in accessible public locations over a number of different days, and at different times of day, to encourage attendance.</p> <p>We will ensure that venues are accessible via public transport, have sufficient parking and are easy to navigate.</p>	<p>Events were spread across May 2023 at different times and on different days.</p> <p>Venues were risk assessed beforehand to ensure they were accessible via public transport, had sufficient parking, and are easy to navigate.</p>	Section 5.2.19

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
4.7 / p16	<p>We recognise that some individuals or groups may have difficulties taking part in the consultation process for a range of reasons. We have identified a number of organisations representing seldom heard groups in the area.</p> <p>As with our non-statutory consultation, these organisations will be written to at the start of the consultation. Requests for specific consultation activities will be planned and agreed with the requesting organisation so that our activities best meet the needs of those it represents.</p>	<p>A list of SHGs were contacted at the start of consultation, listed in our mailout database as special interest groups.</p> <p>No requests for specific adjustments were made by any individuals, seldom heard or special interest groups.</p>	Section 5.2.22
4.7 / p16	We will provide key consultation documents in other formats to meet accessibility requirements upon request, such as large print, Braille or audio versions.	No requests for this were made.	
4.8 / p16	We will respond to reasonable requests for further copies of documents. Requests for hard copies will be reviewed on a case-by case basis. A reasonable copying charge may apply, to be paid by the recipient in advance.	Requests for documents were logged in the consultation enquiry log, and requests dealt with on a case-by-case basis.	
5.1 / p17	Everyone submitting their comments to us (and providing their contact details) will receive an acknowledgement that their feedback has been received.	<p>An auto response email was set up which acknowledged receipt of email feedback.</p> <p>A 'successful feedback' message appeared after submitting online feedback.</p> <p>Letters were sent to those who submitted postal feedback.</p>	Section 5.2.20 and Appendix D.14
5.1 / p17	We are not able to respond individually to every question, but the themes and issues raised during this consultation will be summarised in our Consultation Report, which will be published as part of the DCO application.	All feedback received has been logged and responded to as part of the Consultation report.	Section 5.8 and Appendix D.24
5.1 / p17	We will reply to queries received about the logistics of the consultation itself, details of the events being held, availability of consultation materials or advice on how to submit a response. The project takes data privacy seriously and all data will be held in line with GDPR best practice.	<p>The project set up an enquiry log which recorded queries and their responses. Enquiries around logistics, details of events being held, availability of consultation materials, and advice on how to submit a response were responded to.</p> <p>All data was held in line with GDPR best practice. A data privacy notice was available to view on the project website and on the back of the feedback form.</p>	Section 5.2.20

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Section/page number	SoCC statement (as appears in SoCC)	How the Applicant complied	Reference for evidence/more information
5.2 / 17	<p>At the close of consultation, we will look carefully at all the feedback we've received, alongside further technical assessments, and finalise our proposals.</p> <p>If, as a result of the feedback, the project changes to the extent that it is necessary to carry out further consultation, this further consultation will be carried out in accordance with the principles set out in this SoCC and targeted geographically as is appropriate.</p> <p>A Consultation Report will be produced that sets out how feedback from all of our consultations has shaped the design of the proposed development.</p> <p>The Consultation Report will include a summary of consultation responses, including how this feedback was considered and how it may be used. It will detail the consultation process, demonstrating how it was undertaken in accordance with this SoCC and how it met all legal requirements.</p> <p>Morgan Offshore Wind Limited will then submit a DCO application to the Planning Inspectorate.</p>	<p>All feedback received has been logged and responded to as part of the Consultation report.</p> <p>Project changes were not substantial enough to carry out further consultation.</p>	Section 5.8 and Appendix D.24

5.2.22 Seldom heard groups (SHG)

- 5.2.22.1 A list of 28 SHGs were sent to Councils as an appendix to the draft SoCC during the first SoCC consultation. Although the appendix was not published as part of the final SoCC, the published SoCC noted we will make efforts to contact SHGs in our statutory consultation. 19 of the SHGs listed were emailed ahead of the launch of the statutory consultation 14 April 2023 and again at the launch (19 April 2023).
- 5.2.22.2 The nine groups originally listed in the draft SoCC, were removed following review of the consultees ahead of launch as they were deemed to not be relevant for the Morgan Generation Assets.
- 5.2.22.3 To ensure SHGs were able to review and respond to the consultation, significant effort was taken to make consultation materials accessible and readily available. This included making materials available online and in-person at deposit locations.

5.2.23 Acknowledgement letters

- 5.2.23.1 Every consultee who submitted their feedback to the statutory consultation via email and/or online feedback form received an instant automated response thanking them for their feedback (Appendix D.14).
- 5.2.23.2 To fulfil this particular SoCC commitment, the Applicant also sent hard copy acknowledgement letters to people who provided feedback in writing (where their contact details had been provided) – either via letter or hard copy feedback form.

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These letters were sent to respondents who had provided contact details on 14 July 2023.

5.3 Consultation under section 42 of the Planning Act 2008

5.3.1 Introduction

5.3.1.1 The activities undertaken by the Applicant to comply with its duty to consult under section 42 of the 2008 Act is provided in the following section. The information provided is relevant to section 42 consultation as required under section 37(7)(a) of the 2008 Act and associated guidance (summarised in section 3).

5.3.1.2 Statutory consultation was carried out by the Applicant to ensure the prescribed consultees were engaged and provided the opportunity to comment on the proposals.

5.3.1.3 The Applicant held its section 42 and section 47 consultations at the same time, running from 19 April to 04 June 2023.

5.3.1.4 Additional consultation opportunities were also provided to section 42 and 47 consultees. See section 5.4.

5.3.2 Legislative context

5.3.2.1 Section 42(1) of the 2008 Act states applicants must consult the following about a proposed application:

'a) Such persons as may be prescribed,

aa) the Marine Management Organisation, in any case where the proposed development would affect, or would be likely to affect, any of the areas specified in subsection (2)

b) Each local authority that is within section 43

c) The Greater London Authority if the land is in Greater London

d) Each person who is within one or more of the categories set out in section 44.'

5.3.2.2 For the purposes of section 42(1)(a) of the 2008 Act, the persons prescribed are those listed in column 1 of the table in Schedule 1 to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations).

5.3.2.3 With regards to (aa) (2) of section 42(1), the areas include waters in or adjacent to England up to the seaward limits of the territorial sea; due to the location of Morgan Generation Assets being located wholly within English waters, the MMO were duly included as a section 42 consultee.

5.3.2.4 Section 43 defines local authorities in terms of whether they fall within the categories of an 'A', 'B', 'C' or 'D' local authority:

'A' Is a neighbouring local authority (s43(3)) that shares a boundary with a 'B' host authority

'B' Is either a unitary council or a lower-tier district council in which the Proposed Development and any associated development is situated (a host authority)

'C' Is an upper-tier county council in which the Proposed Development is situated (a host authority)

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‘D’ Is a neighbouring local authority (s43(3)) which is not a lower-tier district council and shares a boundary with a ‘C’ authority.’

- 5.3.2.5 For Morgan Generation Assets, as there is no onshore infrastructure, there is no defined relevant local authority. Despite this the Applicant identified and consulted with local authorities which are broadly within 2 categories, the host authorities identified under section 42(1)(b) for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets and/or those potentially affected visually by the Morgan Generation Assets.
- 5.3.2.6 A full list of consultees identified in accordance with section 42(1)(a) is included at Appendix D.16.
- 5.3.2.7 Due to the location of Morgan Generation Assets in the east Irish Sea, the Greater London Authority (section 41(1)(c)) has not been consulted as the development falls outside the jurisdiction of this authority.
- 5.3.2.8 For the purposes of section 42(1)(d), a person is within a category set out in section 44 of the 2008 Act if the Applicant knows (after making diligent inquiry) that the person falls within three Categories:
- An owner, lessee tenant (whatever the tenancy period) or occupier of the land (Category 1, section 44(1))
 - Interested in the land or has the power to sell and convey the land or, to release the land (Category 2, section 44(2))
 - The person would or might be entitled (a) as a result of the implementing of the order, (b) as a result of the order having been implemented, or (c) as a result of the use of the land once the order has been implemented, to make a relevant claim (Category 3, section 44(4)).
- 5.3.2.9 Due to the location of Morgan Generation Assets in the east Irish Sea, only TCE were consulted for the purposes of section 42(1)(d).
- 5.3.2.10 A duty on the Applicant exists when consulting a person or organisation under section 42, to notify them of the deadline for receipt of comments to the consultation (section 45(1)). As per section 45(2), this must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents and the consultation documents must be supplied to the person by the Applicant for the purposes of the consultation (section 45(3)). All statutory consultation undertaken ensured consultees were given a minimum of 28 days.
- 5.3.2.11 Alongside the statutory consultation as prescribed under section 42, section 46 also requires the Applicant to notify the Secretary of State of the proposed application. Under section 46, the Applicant must supply the Secretary of State with the same information provided for the purpose of complying with section 42, if the Applicant was required by that section to consult the Secretary of State about the proposed application (section 46(1)), and this must be complied with on or before commencing a section 42 consultation (section 46(2)). A section 46 notification was sent to the Secretary of State for DESNZ and the Planning Inspectorate, containing the relevant consultation information on 19 April 2023. See section 5.5.

5.3.3 Identification of section 42 consultees

- 5.3.3.1 The following section provides details on how the Applicant identified section 42 consultees for the statutory consultation under the following two categories

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(Landowners and persons with an interest in land were not contacted as land was not required).

- Prescribed bodies and
- Local authorities

5.3.3.2 For the purposes of the Consultation report, unless specifically identified, the consultees listed under these categories are collectively referred to as 'section 42 consultees;' a full list of prescribed bodies and local authorities is provided in Appendix D.16.

5.3.3.3 Advice Note Three explains the approach taken by the Planning Inspectorate when identifying consultation bodies to be notified, and where relevant, consulted on the scope of the Environmental Statement in accordance with the EIA Regulations 2017).

5.3.3.4 The Advice Note goes on to say that, whilst the responsibility is on the Applicant to ensure pre-application consultation fully accords with requirements of the 2008 Act, applicants may find it helpful to understand the approach taken by the Planning Inspectorate, when meeting its relevant statutory notifications and consultation obligations under the EIA Regulations 2017.

5.3.4 Prescribed bodies

5.3.4.1 These cover the main statutory bodies that are required to be consulted under section 42(1)(a) and comprise of those with specific expertise and/or statutory responsibility for the given discipline(s).

5.3.4.2 The list of consultees detailed in Schedule 1 of the APFP Regulations provides a starting point for identifying the prescribed bodies relevant to the Morgan Generation Assets. Additional bodies who were notified of the proposed application by the Planning Inspectorate under Regulation 11(1)(a) of the EIA Regulations 2017 were then also added (Appendix D.17). The Regulation 11 list is produced in response to the Applicant notifying the Planning Inspectorate that an Environmental Statement was proposed to be provided for the Morgan Generation Assets, under Regulation 8(1)(b) of the EIA Regulations 2017 (Appendix D.22).

5.3.4.3 As part of the ongoing consultation with technical consultees via the Evidence Plan Steering Group, EWGs and Engagement Forums, Morgan Generation Assets was in contact with a number of individuals within the organisations identified within the prescribed consultee list. As such, statutory consultation materials were shared with both the main contact of the organisations and other identified contacts. This is included in Appendix D.16.

5.3.5 Local Authorities

5.3.5.1 For Morgan Generation Assets there is no onshore infrastructure and thus no defined relevant local authority in line with section 42(1)(b) and 43 of the 2008 Act.

5.3.5.2 Advice Note Three at Paragraph 7.1 highlights that some developments, including those with an offshore element, may have a potential visual impact to areas in local authorities which are not identified as 'A', 'B', 'C' or 'D' authorities under section 43. Advice Note Three advises that the Planning Inspectorate will exercise its discretion in determining whether or not to consult with these local authorities on a non-statutory basis, having regard to the likely ZTV.

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- 5.3.5.3 Therefore, despite not falling within the definitions prescribed under section 43, the Applicant identified and consulted with local authorities which fell into 2 categories, the host authorities identified under section 42(1)(b) for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets and/or those potentially affected visually by the Morgan Generation Assets.
- 5.3.5.4 A list of all local authorities identified and consulted is provided in Table 5.12 below and in Appendix D.16, along with the reason for consulting.
- 5.3.5.5 On 01 April 2023, Cumbria County Council, Barrow Borough Council, Copeland Borough Council and South Lakeland District Council, were abolished and replaced by two new unitary authorities of Cumberland Council and Westmorland and Furness Council. Other non-relevant councils (Eden District Council, Carlisle City Council and Allerdale Borough Council) were also abolished and replaced by the same.

Table 5.12: Local authorities identified under section 43 for statutory consultation.

Local Authority	Reason for consulting
Blackpool Council	Transmission Asset host authority/Potential for visual impact
Fylde Council	Transmission Assets host authority
Lancashire County Council	Transmission Assets host authority
Preston City Council	Transmission Assets host authority
South Ribble Borough Council	Transmission Assets host authority
Westmorland and Furness Council – previously Barrow-in-Furness Borough Council, South Lakeland District Council and Cumbria County Council	Potential for visual impact
Chorley Council	Potential for visual impact
Cumberland Council – previously Copeland Borough Council and Cumbria County Council	Potential for visual impact
Douglas Borough Council	Potential for visual impact
Isle of Man Government	Potential for visual impact
Lake District National Park Authority	Potential for visual impact
Sefton Council	Potential for visual impact
Wyre Council	Potential for visual impact

- 5.3.5.6 The Applicant also identified and duly consulted with Parish Councils which were identified as having potential for visual impact of the array area. See Appendix D.16 for a full list of Parish Councils consulted and Appendix D.18 for associated mapping.

5.3.6 Landowners and Persons with an Interest in the Land

- 5.3.6.1 As identified under Section 42(1)(d) of the 2008 Act, the Applicant must consult with the relevant persons defined under Section 44 of the 2008 Act. Section 44 consultees are defined as a person that is an owner, lessee, tenant or occupier of the land; is interested in the land or has power to sell and convey the land; or is entitled to make a relevant claim if the order sought by the proposed application were to be made and fully implemented.

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5.3.6.2 Due to the location of Morgan Generations Assets being entirely within the marine environment, only TCE were required to be consulted for the purposes of Morgan Generation Assets under section 44. As an Agreement for Lease already exists there is no requirement for a Book of Reference (setting out relevant land interests) within this application.

5.3.7 Key non-prescribed consultees

5.3.7.1 Advice Note Three (August 2017, version 7) provides guidance on non-prescribed consultees (NPC), which are not defined as consultation bodies under the EIA Regulations 2017 but have relevant functions and responsibilities which are akin to other consultation bodies.

5.3.7.2 As detailed at Paragraph c1.4 of Advice Note Three, whilst the applicant is not required to consult with the non-prescribed consultation bodies in order to meet the statutory pre-application consultation obligations, the applicant is encouraged to consult with as wide a range of bodies as appropriate during the pre-application stage, including whilst preparing the Environmental Statement.

5.3.7.3 The Applicant included all identified NPCs within the section 42 consultees list and duly consulted with them. There was no distinction made in materials shared as part of consultation between prescribed and NPCs. All NPCs are identified in Appendix D.16.

5.3.7.4 The Isle of Man is also identified as a Relevant British Crown Dependency, which is not listed in Schedule 1 of the APFP Regulations but the Isle of Man Government has planning functions akin to a local authority. As set out above in section 5.3.5, they were included as a section 43 consultee.

5.3.7.5 Advice Note Three also provides guidance on consulting where a proposed development includes an offshore element, such as the case with Morgan Generation Assets. Some of the NPCs relating to offshore proposals also appear as prescribed consultees in Schedule 1 of the APFP Regulations. Some have functions and responsibilities that extend to the offshore area that are not reflected in the relevance or circumstances tests in Schedule 1 of the APFP Regulations. In this regard, the Applicant consulted with a number of organisations, including the RNLI, the MOD and port operators and those with cables in the vicinity of Morgan Generation Assets, as well as organisations whom no longer form part of Schedule 1 of the APFP Regulations for developments in England, such as the Office for Nuclear Regulation and Homes England.

5.3.7.6 All of the identified non-prescribed section 42 consultees (Appendix D.16) received the same information and were included in the same way in the section 42 consultation as the prescribed section 42 consultees.

5.3.8 Communications with section 42 consultees

5.3.8.1 Engagement with section 42 consultees (listed in Appendix D.16) started a week ahead of the statutory consultation, with a 'consultation to run' email sent to all consultees (Appendix D.12.1). This advanced notice email was sent on 14 April 2023 and covered the following key points:

- An outline of the Morgan Generation Assets – acting as an introduction to the project for those who may not previously have been aware of it

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- Noting the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project, also being progressed by the Applicant and Morecambe Offshore Windfarm Limited, for wider awareness
- Raising that the consultation was being publicised via postcards and in accordance with the SoCC
- Signposting to the new project consultation website for further information about the project and as the location for accessing consultation materials, once they were available
- Highlighting where and when in-person consultation events would be held and inviting consultees to attend
- Listing the different ways in which feedback could be submitted and the channels that could be used to provide feedback
- Acknowledging that a follow up communication would be sent at the point the consultation launched.

5.3.8.2 Consultation launch communications were then issued to all section 42 consultees on 19 April 2023. Again, this information was sent via email and covered the following key points:

- Confirming the recipient has been identified as a section 42 consultee by the Morgan Generation Assets and linking to a copy of the section 42 and section 48 notices that had been uploaded to the consultation website
- Outlining the key elements of Morgan Generation Assets
- Highlighting the start and close dates of the consultation
- Listing the different ways in which feedback can be submitted and the channels that could be used to provide feedback
- Explaining what would happen after consultation closes i.e. next steps
- Defining the project as an EIA development
- Signposting that a PEIR had been published, as well as a non-technical summary of the PEIR, and providing links to where the information could be accessed
- Explaining how to contact the Applicant with questions and/or requests for further documentation/information
- Disclosing how data will be managed.

5.3.8.3 Any bounce backs or undelivered emails were used to update and improve the database with alternative emails being sourced for those that bounced or were undelivered.

5.3.8.4 In this case, there were nine 'soft bounce' emails. Not all 'soft bounce' emails can automatically be counted as undeliverable, as in some cases the email was successfully received despite being a 'soft bounce' initially. In all cases where a 'soft bounce' email failed to reach a stakeholder, they were reached either via an alternative email address contacted on 19 April 2023, or via the extended consultation postal mailout on 16 June 2023 (see section 5.4.1).

5.3.8.5 In the interest of encouraging as much feedback as possible before the close of statutory consultation, the Applicant sent a 'Consultation Closing Soon' email (Appendix D.12.3) on 22 May 2023, approximately halfway through the statutory

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consultation period, to all section 42 and section 47 consultees, and a 'Last Chance to Provide Feedback' email (viewable in Appendix D.12.4), again to all section 42 and section 47 consultees, on 02 June 2023, two days prior to the close of statutory consultation.

5.3.8.6 These emails reiterated how consultees could find out more information about the project and provide feedback. The 'Consultation Closing Soon' email also reminded people of the remaining in-person exhibition events and directed people to a recording of the online event webinar on the consultation website.

5.4 Additional targeted statutory consultation

5.4.1 Additional targeted statutory consultation – number 01

5.4.1.1 Following the close of statutory consultation, analysis of the email database was conducted to identify any section 42 and section 47 consultees who had received but not opened any of the four emails they were sent at the start of, or during, the consultation period.

5.4.1.2 It was identified that a total of 71 section 42 and section 47 consultees had received, but not opened, any of the emails they had been sent during the consultation.

5.4.1.3 To ensure these consultees were not disadvantaged by not having opened the emails they were sent a set of consultation materials in the post, including:

- A statutory consultation brochure
- A USB containing the full PEIR
- A PEIR NTS
- A SoCC
- A paper copy feedback form.

5.4.1.4 All these identified consultees were given a further 28 days to consider the consultation material and provide their feedback. The letters were issued on 16 June 2023 and the deadline provided for the receipt of feedback was 13 July 2023.

5.4.1.5 As a result of this communication and extension, an additional two section 42 and section 47 consultees provided their feedback. These included The Water Services Regulation Authority (Ofwat) and the Northern Ireland Fish Producers' Organisation (NIFPO). Ofwat noted it had no comments on the Morgan Generation Assets, with NIFPO providing a longer response. This feedback was treated in the same way as that received during the initial consultation and can be seen in the appendices associated with section 5.8 of this report.

5.4.2 Additional targeted statutory consultation – number 02

5.4.2.1 On 16 August 2023 the Applicant became aware that a technical website error meant respondents' feedback to Question 1.14 (Human Health), submitted via the online feedback form on the consultation website, had not been captured.

5.4.2.2 The Applicant therefore re-engaged all those who had completed an online feedback form and gave them the opportunity to resubmit their feedback for question 1.14.

5.4.2.3 The project therefore proactively contacted everybody who had submitted an online feedback form - and who had provided their contact details (a total of 74 consultees, including one section 42 consultee with the remainder being classified as section 47

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consultees). In total, 59 consultees received both a letter and an email, seven consultees received just a letter and eight consultees only received an email. Everybody received at least one form of communication directly (see Appendix D.19.1 for example email and letter).

5.4.2.4 The letters were issued on 25 August 2023 and responses – which could be submitted by either email or letter – were requested by 25 September 2023. The duration of this period was 31 days.

5.4.3 Additional targeted statutory consultation – number 03

5.4.3.1 On 26 January 2024, the Applicant became aware that National Grid Electricity Transmission (NGET) and Vattenfall UK, in its capacity as the operator of the Ormonde Offshore Wind Farm, had not been contacted as part of the statutory consultation.

5.4.3.2 It is not a legal requirement for the Applicant to consult with either NGET or Vattenfall UK under section 42 of the 2008 Act, as the Applicant considered that the Morgan Generation Assets will not affect any existing assets which either consultee owns or operates. However, the Applicant is committed to consulting with consistency, noting similar stakeholders had been consulted previously.

5.4.3.3 The Applicant therefore provided both NGET and Vattenfall UK with 28 days to consider the proposals and provide their feedback. Both consultees were sent the section 42 notice, section 48 notice, statutory consultation brochure, feedback form, PEIR NTS, and the project update newsletter.

5.4.3.4 NGET and Vattenfall UK were sent information by post and email (see Appendix D.19.2) on 02 February 2024. Responses were requested by 04 March 2024. No responses were received from either consultee.

5.5 Notifying the Secretary of State under section 46

5.5.1.1 The project issued its section 46 notification, in accordance with section 46 of the 2008 Act, on 19 April 2023 to the Planning Inspectorate and The Rt Hon Grant Shapps MP, in his capacity as then Secretary of State for DESNZ.

5.5.1.2 The project's email delivery report showed that the emails were delivered to and received by Mr Shapps' office (Appendix D.20.1). The project's email delivery report however showed a 'soft bounce' for the email to the Planning Inspectorate. Following a conversation with the Planning Inspectorate, it was confirmed that it did not receive the Applicant's section 46 notification.

5.5.1.3 The Applicant re-sent the section 46 notification email on 24 April 2023, within the statutory minimum requirement of 28 days. The Planning Inspectorate confirmed receipt on the same day and the Planning Inspectorate subsequently published on 27 April 2023 its confirmation of acceptance of the section 46 notification on its website (Appendix D.20.2).

5.6 Statutory publicity under section 48 of the Planning Act 2008

5.6.1 Introduction

5.6.1.1 This section outlines sets out how the Applicant has complied with the “Duty to Publicise” under section 48 of the 2008 Act, a crucial step in the process of seeking a DCO as it ensures that the public is informed about the project and has the opportunity

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to engage in the consultation and provide their views and raise any concerns or objections that could help influence the project's development.

5.6.2 Legislative context

5.6.2.1 Section 48(1) of the 2008 Act requires the Applicant to publicise a proposed application at the pre-application stage, in the prescribed manner, to include a deadline for receipt of responses to the publicity.

5.6.2.2 The prescribed manner is set out in Regulation 4 of the APFP Regulations. Regulation 4(2) sets out what the publicity must entail, specifically this requires the notice to be placed within:

- One or more local newspapers, for at least two consecutive weeks
- A national newspaper (once)
- The London Gazette (once) and if land in Scotland is affected, the Edinburgh Gazette (once).

5.6.2.3 And where the proposed application relates to offshore development, within:

- Lloyds List (once)
- An appropriate fishing trade journal (once).

5.6.2.4 Regulation 4(3)(a) – (i) goes on to provide the detail of the matters which must be included in that notice. This includes:

“(a) The name and address of the applicant;

(b) a statement that the applicant intends to make an application for development consent to the Commission;

(c) a statement as to whether the application is EIA development;

(d) a summary of the main proposals, specifying the location or route of the proposed development;

(e) a statement that the documents, plans and maps showing the nature and location of the proposed development are available for inspection free of charge on a website maintained on or behalf of the applicant;

(ea) The address of the website where the documents, plans and maps can be inspected;

(eb) The place on the website where the documents, plans and maps may be inspected;

(ec) A telephone number which can be used to contact the applicant for enquiries in relation to the documents, plans and maps;

(f) the latest date on which those documents, plans and maps will be available for inspection on the website (being a date not earlier than the deadline in subparagraph(i));

(g) whether a charge will be made for copies of any of the documents, plans or maps and the amount of any charge;

(h) details of how to respond to the publicity; and

(i) a deadline for receipt of those responses by the applicant, being not less than 28 days following the date when the notice is last published.”

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5.6.2.5 In developing and publishing the section 48 notice, regard must be had to the EIA Regulations 2017 and relevant guidance about pre-application procedures. Regulation 13 of the EIA Regulations 2017 places a requirement on the applicant, where a development is EIA development, they must at the same time as publicising the notice of the proposed application under section 48(1), send a copy of the notice to the relevant consultation bodies and to any person notified to the applicant in accordance with Regulation 11(1)(c) of the EIA Regulations 2017. The DCLG Guidance, relevant to section 48 publicity, details at Paragraph 58 that:

“Applicants are required to publicise their proposed application under section 48 of the Planning Act and Regulations and set out the detail of what this publicity must entail. This publicity is an integral part of the public consultation process. Where possible, the first of the two required local newspaper advertisements should coincide approximately with the beginning of the consultation with communities. However, given the detailed information required for the publicity in the Regulations, aligning publicity with consultation may not always be possible, especially where a multi-stage consultation is intended.”

5.6.3 Section 48 notice

Development of the notice

5.6.3.1 The section 48 notice, which is included as Appendix D.21.1, provided the Applicant's details, project description, an overview of what the application would cover, and consultation period dates. It specified where consultation materials were available to view and how people could respond to the notice or make representations in respect of the project.

Publicising the notice

5.6.3.2 The section 48 notice was first published in The Guardian on 12 April 2023. The remaining notices appeared in the press between 12 to 21 April, to coincide with the start of the section 42 and 47 consultation period on 19 April 2023, and copies of the notice were sent to all consultation bodies (listed in Appendix D.4 and D.16) on 19 April 2023.

5.6.3.3 The email sent to consultees notifying them of the consultation (Appendix D.12.2) included reference to the section 48 notice and a link to where the notice could be read on the Applicant's consultation website, along with a formal request for comment on the proposed application after its first publication.

5.6.3.4 The email also confirmed that, as previously advised, the deadline for responses to the consultation was 04 June 2023.

5.6.3.5 The notice was available on the consultation website from 19 April 2023 and appeared in the following newspapers:

- Fishing News (fishing journal) - 12 April 2023
- Lloyd's List (shipping news)– 12 April 2023
- London Gazette (national newspaper) - 12 April 2023
- The Guardian (national newspaper) - 12 April 2023
- Barrow Mail (local newspaper) - 12 and 19 April 2023
- Blackpool Gazette (local newspaper) – 12 and 19 April 2023

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- Lancashire Post (local newspaper) – 12 and 19 April 2023
- Isle of Man Courier (local newspaper) - 14 and 21 April 2023

5.6.3.6 All these notices, as they appeared in situ, are shown at Appendix D.21.2.

5.6.3.7 The launch of consultation received media coverage in local and regional newspapers and on news websites. This included BBC News and Isle of Man Today, which both ran articles focusing on the consultation. This coverage included details of the consultation events, the webinar and links to the consultation website. The articles can be viewed at Appendix D.21.3.

5.7 Consultation under the Infrastructure Planning (Environmental Impact Assessment (EIA) Regulations 2017 the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017

5.7.1 Introduction

5.7.1.1 This section presents and summaries the consultation undertaken for the Morgan Generation Assets in accordance with the EIA Regulations 2017, the Conservation of Habitats and Species Regulations 2017 and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (HRA Regulations). It sets out the legislative requirements, the approach adopted and details how the Applicant has complied with the relevant legislation. This section also includes the Morgan Generation Assets approach to transboundary consultation.

5.7.1.2 The EIA Regulations 2017 contain provisions that are relevant to pre-application consultations and are summarised as:

- Regulation 8 provides the procedure for establishing whether an EIA is required. It requires applicants, prior to carrying out consultation under section 42, to either ask the Secretary of State to adopt a screening opinion or notify them that the applicant proposes to provide an Environmental Statement in respect of that development
 - The Applicant notified the Planning Inspectorate, on behalf of the Secretary of State, in its letter dated 26 May 2022 that it would provide an Environmental Statement with the DCO application (Appendix D.22).
- Regulation 10 provides details relating to the request for a Scoping Opinion, including what a Scoping Report should include, as detailed above
- Regulation 11 provides the procedure to facilitate the preparation of an Environmental Statement for EIA development. This includes provisions for the notification of the consultation bodies of their duties in providing information to facilitate the Environmental Statement, the provision of a list of those bodies so notified to the applicant and notifying the applicant of those persons considered likely to be affected or have an interest in the project or unlikely to become aware of the proposed development by other means set out in Part 5 of the 2008 Act
 - Regulation 11 list of consultation bodies and interested persons was received from the Planning Inspectorate (Appendix D.17) alongside the Scoping Opinion in July 2022 (Planning Inspectorate, 2022)

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- Regulation 12 requires that the SoCC, drafted under section 47(a), must set out whether the proposed development is EIA and if so, how the applicant intends to publicise and consult on the PEIR
 - As set out previously there is no requirement for the Morgan Generation Assets to prepare a SoCC under section 47 of the 2008 Act. However, as consultation is an integral part of the development of the proposals, a SoCC has been prepared in line with guidance, and provides the relevant detail (Appendix D.1)
- Regulation 13 relates to pre-application publicity under section 48 and requires the applicant, at the same time as publishing the notice under section 48 to provide a copy of the notice to be sent to the consultation bodies and to any person notified to the applicant, in accordance with regulation 11(1)(c)
 - The Applicant issued a copy of the section 48 notice (Appendix D.21.1) to the relevant consultation bodies on 19 April 2023 after the first publication of the section 48 notice (27 April 2023).

5.7.1.3 The Planning Inspectorate provides further guidance on matters relating to the EIA Regulations 2017, as detailed:

- Advice Note Seven explains the EIA process as set out in the EIA Regulations 2017 and in particular addresses the procedures for EIA screening and scoping; notification and consultation; matters relating to the production of Preliminary Environmental Information (PEI) and the preparation of an Environmental Statement
- Advice Note Fourteen refers to the EIA Regulations 2017 consultation highlighting that consultation undertaken as part of the EIA process is separate to that required under the 2008 Act. It states that applicants may wish to draw attention to consultation responses received under the EIA process, but any reference to that consultation should be addressed separately from the statutory consultation carried out under the provisions of the 2008 Act.

5.7.2 2017 EIA Regulation consultation

5.7.2.1 The Applicant submitted the Morgan Generation Assets Scoping Report (pursuant to Regulation 10 of the EIA Regulations 2017), to BEIS on 14 June 2022 (Morgan Offshore Wind Ltd, 2022). The Scoping Report contained details of the proposed approach to EIA for each topic and in accordance with Regulation 10(3) of the EIA Regulations 2017, including:

- A plan sufficient to identify the area required for the construction, operation, maintenance and decommissioning of the Morgan Generation Assets
- A description of the Morgan Generation Assets, including its location and technical capacity
- An explanation of the likely significant effects of the Morgan Generation Assets on the environment including the aspects likely to be significantly affected and
- Other information the Applicant wished to provide, which included a baseline description for each topic chapter now presented in the Environmental Statement (Document Reference F1 – F4).

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- 5.7.2.2 The Planning Inspectorate consulted upon the Scoping Report with statutory consultees and a Scoping Opinion was received on 22 July 2022 (The Planning Inspectorate, 2022).
- 5.7.2.3 The Applicant met informally with stakeholders in Quarter 3 of 2022 to discuss their feedback in more detail as part of the EPP, Engagement Forums and wider technical consultation and to make any necessary amendments to the proposed approach, ahead of formal consultation on the PEIR. Please refer to section 4.4 above for participants and the TEP (Document Reference E4) for further information.
- 5.7.2.4 Consultation on the PEIR (Morgan Offshore Wind Ltd, 2023) was undertaken with section 42 consultees in parallel with statutory consultation in accordance with section 47 of the 2008 Act. This provided the opportunity to review and comment upon the proposed Morgan Generation Assets development, the contents of the PEIR and the assessments undertaken to date. See section 5.2 of this Consultation report for further information.
- 5.7.2.5 Further information with regards to EIA Consultation can be found at Volume 1 Chapters 1 and 5 and the specific topic chapters of the Environmental Statement (Document Reference F1 – F4).

5.7.3 Transboundary consultation

- 5.7.3.1 Transboundary effects arise when impacts from a project within one European Economic Area (EEA) state affect the environment of another state(s). The need to consider such transboundary effects has been embodied by the United Nations Economic Commission for Europe Convention on EIA in a Transboundary Context (commonly referred to as the 'Espoo Convention').
- 5.7.3.2 The Espoo Convention is aimed at preventing, mitigating and monitoring environmental damage by ensuring that explicit consideration is given to transboundary environmental factors before a final decision is made as to whether to approve a project. In regard to NSIPs, the Espoo Convention has been implemented in the UK via the EIA Regulations 2017. Regulation 32 of the EIA Regulations 2017 sets out a prescribed process for notifying and consulting EEA states that may be affected by a development that is likely to have significant transboundary effects.
- 5.7.3.3 Furthermore, the Planning Inspectorate's Advice Note Twelve: Transboundary Impacts and Processes (December 2020, version 6) sets out the procedures for consultation in association with an application for a DCO where such development may have significant transboundary impacts. The note sets out the roles of the Planning Inspectorate, other states and developers.
- 5.7.3.4 The Planning Inspectorate were notified of the potential for transboundary impacts through the request for a Scoping Opinion, and the Morgan Generation Assets Scoping Report presented the identification and screening of transboundary impacts (Morgan Offshore Wind Ltd, 2022). A transboundary impacts screening report was also produced and consulted upon as part of the PEIR (Morgan Offshore Wind Ltd, 2023).
- 5.7.3.5 The Planning Inspectorate is required to comply with Regulation 32 of the EIA Regulations 2017 regarding potential transboundary effects on non-UK states and duly published a Regulation 32 notice on 10 October 2022 (Appendix D.23.1). A notice was also published in the London Gazette on 17 October 2022 (Appendix D.23.2). A Regulation 32 response was received from the Republic of Ireland (Appendix D.23.3) on 21 November 2022.

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- 5.7.3.6 Despite not being a Regulation 32 EEA State, the Isle of Man Government have been consulted throughout the pre-application stages, recognising them as a key consultee.
- 5.7.3.7 Volume 3, Annex 5.2: Transboundary impacts screening of the Environmental Statement (Document Reference F3.5.2) provides an update to the transboundary screening and considers up to date information, the transboundary screening undertaken by the Planning Inspectorate, consultation responses from EEA States and the outcomes of the EIA.

5.7.4 Habitats Regulations Assessment consultation

- 5.7.4.1 The requirement and process for the consideration of potential impacts of plans and projects on European sites have followed the European Union's (EU) Habitats Directive (Directive 92/43/EEC). In terrestrial areas of the UK and territorial waters out to 12 nm, the land and marine aspects of Habitats Directive and certain elements of the Wild Birds Directive (Directive 2009/147/EC) are transposed into UK law through The Conservation of Habitats and Species Regulations 2017 as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. In waters beyond 12 nm, The Conservation of Offshore Marine Habitats and Species Regulations 2017 (the Offshore Habitats Regulations) apply, which transpose the Habitats and Birds Directives into national law. These regulations are together referred to as the Habitats Regulations.
- 5.7.4.2 Under the Habitats Regulations, an Appropriate Assessment must be carried out on all plans and projects that are likely to have a significant effect on a European site. European sites include SACs, candidate SACs (cSACs), Site of Community Importance, Special Protection Areas (SPAs) and as a matter of policy (Defra, 2021), possible SACs (pSACs) and potential SPAs (pSPAs). In the UK, the requirements of the Habitats Regulations are also extended to consider the effects on Ramsar sites (listed or proposed under the Ramsar Convention on Wetlands of International Importance) and sites which are used to compensate for adverse impacts on other European sites. These sites in the UK now form part of the National Site Network but the term 'European site' has been retained for sites protected in European Member States, England and Wales and the rest of the UK in accordance with guidance issued by the UK Government on the changes made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 to the Conservation of Habitats and Species Regulations 2017 (as amended) (Defra, 2021).
- 5.7.4.3 The Habitats Regulations make it clear that the person applying for the consent of the plan or project must provide such information as the Competent Authority may reasonably require for the purposes of the assessment. The HRA Screening Report (Document Reference E1.4) and Information to Support Appropriate Assessment (Document Reference E1.1) provides this information.
- 5.7.4.4 Morgan Generation Assets undertook consultation on the HRA as part of the EPP, within the Steering Group meetings, EWGs as well as during statutory consultation when a draft HRA Stage 1 Screening Report and draft ISAA were provided alongside the PEIR (Morgan Wind Ltd, 2023). Please refer to section 4.4 above for participants of the EPP and the TEP (Document Reference E4) for further information.
- 5.7.4.5 Responses received during the statutory and non-statutory consultation have been considered and fully reported in the final HRA Screening Report (Document Reference E1.4) and ISAA (Document Reference E1.1-1.3), as submitted as part of the DCO application. Consultation responses during statutory consultation on the draft ISAA and the Applicants responses are included in Appendix D.24.

5.8 Summary of responses to statutory consultation and Applicant regard

5.8.1 Introduction

5.8.1.1 This section of the Consultation Report provides a summary of the responses received during statutory consultation and how these were considered by the Applicant in the final DCO application for the Morgan Generation Assets.

5.8.1.2 All responses from the statutory consultation and the Applicant's response to such are detailed in the tables contained within Appendix D.24. The intention of this section is to draw out the key issues, the Applicants regard and any resultant changes. References are made throughout to relevant chapters in the Environmental Statement and other supporting documents submitted with the application for consent.

5.8.1.3 Section 42 consultees such as prescribed bodies and local authorities have been considered alongside section 47 consultees such as members of the public and non-statutory organisations.

5.8.1.4 Regard has been had to consultation responses in a number of different ways. In most cases, comments have been addressed through provision of further information or clarification provided either in the Environmental Statement chapters submitted with the application or through post-PEIR stakeholder engagement. In some cases, a design decision was made in direct response to consultation responses.

5.8.2 Legislation and Guidance

Planning Act 2008

5.8.2.1 Section 49(2) of the 2008 Act requires the Applicant to have regard to relevant responses to the consultation and publicity that has been undertaken under section 42, 47 and 48. A relevant response defined in section 49(3) means:

- a response from a person consulted under section 42 that is received by the applicant before the deadline imposed by section 45 in that person's case
- a response to consultation under section 47(7) that is received by the applicant before any applicable deadline imposed in accordance with the statement prepared under section 47, or
- a response to publicity under section 48 that is received by the applicant before the deadline imposed in accordance with section 48(2) in relation to that publicity.

5.8.2.2 Additionally, section 37(7) requires the consultation report providing details of:

- what has been done in compliance with section 42, 47 and 48 in relation to a proposed application that has become the application
- any relevant responses
- the account taken of any relevant responses.

Guidance

DCLG Guidance on the pre-application process

5.8.2.3 In relation to the consultation report and responses to pre-application (statutory consultation), Paragraph 23 of the DCLG Guidance advises that during the pre-

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application stage, applicants are required to, *inter alia*, 'have regard to relevant responses to publicity and consultation' in accordance with the requirements of section 49.

5.8.2.4 Additionally, Paragraph 80 includes the requirement to:

- '...set out a summary of relevant responses to consultation (but not a complete list of responses);
- provide a description of how the application was informed and influenced by those responses, outlining any changes made as a result and showing how significant relevant responses will be addressed;
- provide an explanation as to why responses advising on major changes to a project were not followed, including advice from statutory consultees on impacts.'

5.8.2.5 Paragraph 81 highlights that it is good practice that those who responded to the consultation are informed on the results, how the information received has been used by the applicants to shape and influence the project and how any outstanding issues will be addressed before an application is submitted.

5.8.2.6 Further, Paragraph 115 states applicants should be able to demonstrate that they have acted reasonably in fulfilling the requirements of the 2008 Act, including taking account of responses to consultation and publicity. If the applicant has acted reasonably, it is unlikely the Secretary of State will conclude that the pre-application consultation was inadequate, on the basis that particular impacts had not been mitigated to an appropriate degree.

[The Planning Inspectorate Advice Note Fourteen \(The Planning Inspectorate, 2021\)](#)

5.8.2.7 The Advice Note on compiling the Consultation Report states that the report should summarise the individual responses received and categorised in an appropriate way and identify those which are relevant (directly or indirectly) to change made to the project during the pre-application stage, as required by section 49 of the 2008 Act. The Advice Note also advises an explanation as to why responses may have led to no change, including if responses were late to be received.

5.8.3 Key Project changes

5.8.3.1 Table 5.13 provides a summary of the key project changes following statutory consultation, the reasoning for the change and where further information can be found.

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Table 5.13: Key project changes as a result of consultation.

Change	Description	Justification	Reference
Refinement of Array boundary & turbine number and size	<p>Refinement of the Morgan Array Area and maximum number of turbines:</p> <p>Area: reduced from 322 km² at PEIR, to 280 km² at application.</p> <p>Number of turbines: reduced from up to 107 at PEIR, to up to 96 at application.</p> <p>The maximum rotor diameter of the rotor blades has increased from 280 m to 320 m and thus the maximum height increased from 324 m at PEIR to 364 m at application.</p>	<p>In response statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, regarding concerns over commercial fisheries, shipping and navigation, other sea users and the significance of visual effects, the Morgan Array Area has been reduced as well as the number of maximum turbines.</p> <p>The maximum wind turbine rotor diameter was increased in response to feedback from the supply chain.</p>	<p>Section 5.8.8 of this report and all chapters within Volume 1 and 2 of the Environmental Statement</p>
Refinement of turbine separation distances & lines of orientation	<p>The minimum separation distance between offshore surface structures (wind turbines and OSPs) has increased from 875 m between offshore surface structures within a row and 1000 m between rows at PEIR to 1,400 m between offshore surface structures within or between rows at application.</p> <p>The Applicant has also committed to an area free of surface infrastructure within the Morgan Array Area, maintenance of two 'lines of orientation' through the Morgan Array Area and that the wind turbine rows would be orientated roughly north to south.</p>	<p>In response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, regarding concerns over commercial fisheries and shipping and navigation minimum separation within and between turbine rows has increased providing additional space for marine users to pass between and around the Morgan Generation Assets.</p> <p>The area free of surface infrastructure and the lines of orientation have been designed to provide additional space to facilitate safety of marine navigation, fishing activities and SAR and to promote co-existence with fishing activities.</p>	<p>Section 5.8.8, 5.8.16, 5.8.17, 5.8.20, 5.8.21, 5.8.25 and 5.8.25 of this report and the following sections of the Environmental Statement:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 4: Site selection and consideration of alternatives • Volume 2, Chapter 6: Commercial fisheries • Volume 2, Chapter 7: Shipping and navigation • Volume 2, Chapter 9: Other sea users • Volume 2, Chapter 10: Seascape, landscape and visual resources • Volume 2, Chapter 13: Socio-economics • Volume 2 Chapter 14: Human health assessment
Reduction in foundation options	<p>The PEIR included monopiles as a design option for wind turbines and OSP foundations. Monopiles have been removed from the design envelope.</p>	<p>In response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively, regarding concerns over underwater sound as well as ongoing seabed condition engineering studies. Removal of monopiles and</p>	<p>Sections 5.8.9, 5.8.12, 5.8.13 and 5.8.14 of this report and the following sections of the Environmental Statement:</p> <ul style="list-style-type: none"> • Volume 1, Chapter 4: Site selection and consideration of alternatives

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Change	Description	Justification	Reference
	<p>Owing to the removal of monopiles from the foundation options, the maximum hammer energy associated with impact piling of foundations has been reduced from 5,500 kJ presented in the PEIR to 4,400 kJ in the Environmental Statement.</p>	<p>reduction in the maximum hammer energy will reduce the underwater sound emitted and reduce the potential impact on marine wildlife.</p>	<ul style="list-style-type: none"> • Volume 2, Chapter 2: Benthic subtidal ecology • Volume 2, Chapter 3: Fish and shellfish • Volume 2, Chapter 4: Marine mammals • Volume 3, Annex 3.1: Underwater sound technical report
<p>Refinement in parameters for the Morgan inter-array cables</p>	<p>The volume of sandwave clearance required has been refined from the PEIR to the Environmental Statement. The proportion of inter-array cables requiring sandwave clearance has reduced from 50% to 40% and the sandwave clearance width along inter-array cables has reduced from 104 m to 80 m. This subsequently reduces the sandwave clearance and seabed preparation total volume in the Morgan Array Area (inter-array cables, interconnector cables and foundations) by 24% (from 24,053,910 m³ to 18,236,920 m³).</p>	<p>In response to statutory consultation and post-statutory consultation engagement, particularly, but not exclusively impacts to physical processes and benthic ecology sandwave clearance volumes have been reduced.</p>	<p>Sections 5.8.8, 5.8.9, 5.8.11, 5.8.12, 5.8.13, 5.8.14 and 5.8.18 of this report, Habitats Regulations Assessments (Document Reference E1 – E4) and the following sections of the Environmental Statement:</p> <p>Volume 1, Chapter 3: Project description of the Environmental Statement</p> <p>Volume 1, Chapter 4: Site selection and consideration of alternatives</p> <p>Volume 2, Chapter 1: Physical processes</p> <p>Volume 2, Chapter 2: Benthic subtidal ecology</p> <p>Volume 2, Chapter 3: Fish and shellfish ecology</p> <p>Volume 2, Chapter 4: Marine mammals</p> <p>Volume 2, Chapter 8: Marine archaeology and cultural heritage</p>

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5.8.4 Overview of responses

- 5.8.4.1 Statutory consultation feedback was received from a total of 233 section 42 and section 47 consultees.
- 5.8.4.2 All responses have been categorised by topic, aligning with the chapters of the PEIR, as set out in Table 5.14. In addition, comments also related to the draft HRA and dDCO which were also available during the consultation for people to give their views on.
- 5.8.4.3 Overarching and non-topic related responses can be seen in section 5.8.5 and Appendix D.24.1.
- 5.8.4.4 Responses from both section 42 and section 47 consultees have been dealt with together. It is important to note that each issue raised is given equal importance, regardless of the frequency with which it was raised, or who raised it.

Table 5.14: PEIR chapter details and location of summary details.

PEIR Volume	PEIR Chapter Number	PEIR Chapter title	Reference within section 5.7 and Appendix
1 – Introduction			
	1	Introduction and overarching glossary	Section 5.8.6 Appendix D.24.2
	2	Policy and legislative context	Section 5.8.7
	3	Project description	Section 5.8.8 Appendix D.24.3
	4	Site selection and consideration of alternatives	Section 5.8.9 Appendix D.24.4
	5	Environmental Impact Assessment methodology	Section 5.8.10 Appendix D.24.5
2 – Offshore chapters			
	6	Physical processes	Section 5.8.11 Appendix D.24.6
	7	Benthic subtidal ecology	Section 5.8.12 Appendix D.24.7
	8	Fish and shellfish ecology	Section 5.8.13 Appendix D.24.8
	9	Marine mammals	Section 5.8.14 Appendix D.24.10
	10	Offshore ornithology	Section 5.8.14 and Appendix D.24.11
	11	Commercial fisheries	Section 5.8.15 and Appendix D.24.12
	12	Shipping and navigation	Section 5.8.17 and Appendix D.24.13

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PEIR Volume	PEIR Chapter Number	PEIR Chapter title	Reference within section 5.7 and Appendix
	13	Marine archaeology	Section 5.8.18 and Appendix D.24.14
	14	Other sea users	Section 5.8.20 and Appendix D.24.15
	15	Seascape, Landscape and Visual Resources	Section 5.8.21 and Appendix D.24.16
	16	Aviation and radar	Section 5.8.22 and Appendix D.24.17
	17	Climate Change	Section 5.8.23 and Appendix D.24.18
	18	Socio – economics	Section 5.8.24 and Appendix D.24.19
	19	Human health assessment	Section 5.8.25 and Appendix D.24.20
	20	Inter-related effects (offshore)	Section 5.8.26

5.8.4.5 Comments received in regard to the draft HRA and dDCO are dealt with below at sections 5.8.27 and 5.8.28.

5.8.4.6 All responses received can be viewed within the tables within Appendix D.24, alongside the Applicant’s response. The tables also set out whether the feedback resulted in a project change (whether directly or indirectly) following statutory consultation, ahead of submission of the DCO application.

5.8.4.7 Within these tables each responder is given a unique reference code as shown in Figure 5.8 below:

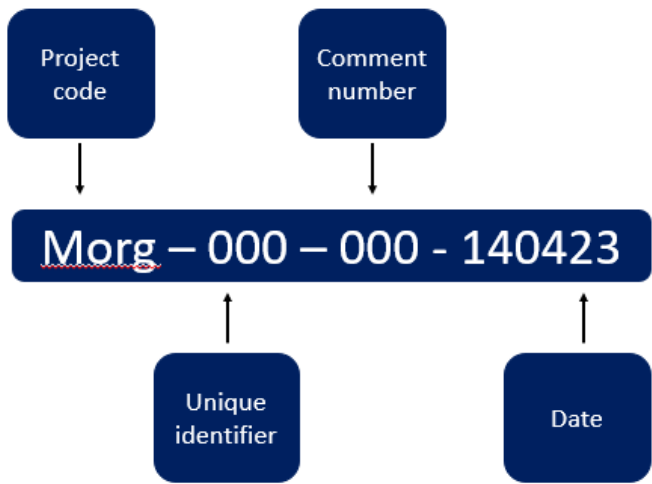


Figure 5.8: Unique reference coding in feedback tables

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- 5.8.4.8 Many responses received contained comments relevant to more than one topic. Each response has been broken down and separated across the relevant topics as appropriate. Where consultees raised issues that were relevant to multiple topics, these are allocated to the most relevant topic areas and the responses can be seen within the associated tables for each topic area, as applicable (Appendix D.24.1 to D.24.22).
- 5.8.4.9 Feedback responses were also received relating to formatting, typographic errors and incorrect references, rather than relating directly to a specific subject area. Any such issues raised have been amended in the relevant final application document(s). Comments were also received that requested clarifications on terminology and definitions, which have similarly been resolved in the relevant final application document(s).
- 5.8.4.10 All comments have had due regard paid to them by the Applicant. In cases where this has resulted in amendments to the project design and/ or changes or additions to the application documentation this is identified. In some cases, the responses led to further discussion and agreement with the relevant consultees. Responses via topic, and regard had to them, are also described within the consultation tables of the relevant chapters of the Environmental Statement

5.8.5 Overarching consultation process and non-technical comments

- 5.8.5.1 The majority of feedback received related to specific topics or the areas of most interest to the responding organisation or individual. However, some respondents also left general overarching comments, either on aspects of the consultation process itself or on subjects beyond the specific scope of the consultation.
- 5.8.5.2 These comments broadly fell into the categories below:
- Requests for further information and for materials, such as the PEIR or components thereof, the consultation brochure or the feedback form, in a variety of formats (USB stick, hard copies, website links)
 - Queries relating to practical aspects such as the dates and location of information events
 - Comments on the perceived accessibility of the website and/or feedback form
 - Requests for an extension to the deadline for the submission of feedback
 - General comments on the design or content of consultation materials
 - Comments on the balance of digital resources versus printed materials
 - Feedback noting no comments would be made, or that a consultee did not feel it relevant that they provided a comment on the proposals
 - Feedback relating to community benefits and supply chain opportunities
 - General comments expressing support or disapproval
 - General comments sharing individual, ideological views on subjects such as renewable energy, offshore wind, climate change and Government policy
 - General comments around engagement, including how consultation events were run and assertions that public consultations are tokenistic and lack transparency
 - Administrative information, such as notification of a change of contact person within an organisation.

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5.8.5.3 Where these comments or queries asked for specific information or resources, the Applicant sought to provide the requested information in a timely fashion. Where comments constituted an opinion or provided additional information, this feedback was noted and/or considered in the development of the project and the application for consent.

5.8.5.4 All feedback received which was deemed to be overarching and non-technical, can be found in Appendix D.24.1 alongside the Applicant's response.

5.8.6 Introduction and glossary (PEIR Volume 1, Chapter 1)

5.8.6.1 The feedback included consultees outlining the benefits of offshore wind farms. Beyond this, consultees sought assurance that any impacts created by the project can be managed in an appropriate manner and that such measures are made clear to contractors.

5.8.6.2 Broader feedback related to the potential transboundary impacts with the Isle of Man, specifically the habitats and species protected under Manx law or identified as threatened or declining by the Convention for the Protection of the Marine Environment of the North-East Atlantic (the OSPAR Convention), as well as impacts on commercial fisheries. It was recommended that fishing organisations on the island were included as consultees via the appointed Fisheries Liaison Officer. It was also raised that due to the uncertainty surrounding potential offshore wind farm impacts even robust baseline environmental information could not comprehensively address all pre-construction, operation/maintenance and decommissioning phase knowledge gaps. A life cycle adaptive management approach was recommended.

5.8.6.3 The Applicant recognises that as the Isle of Man is a relevant British Crown Dependency of the UK it is not considered to be a transboundary consultee of the Morgan Generation Assets. However, it is recognised that they have functions akin to a local authority and have been fully involved in the consultation process. Potential impacts upon environmental receptors within the Isle of Man are fully considered within the Environmental Statement.

5.8.6.4 The Applicant confirms that direct engagement has taken place with commercial fisheries' representatives via statutory consultation and the engagement held with technical stakeholders as presented in the TEP (Document Reference E4).

5.8.7 Policy and legislation (PEIR Volume 1, Chapter 2)

5.8.7.1 No feedback responses were received which related directly to the Policy Chapter.

5.8.8 Project description (PEIR Volume 1, Chapter 3)

5.8.8.1 Feedback regarding the project description was provided by the MCA, MMO, Natural England, NRW, the Isle of Man Government and Ørsted.

5.8.8.2 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.3.

5.8.8.3 The key issues raised relevant to the project description, which have been identified during the statutory consultation include:

- Safety concerns on navigation within the Morgan Array Area
- Regulatory and informational requirements Unexploded Ordnance (UXO) clearance

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- Clearly defined parameters and Maximum Design Scenario (MDS) required.

Summary of Consultee and Applicant Responses

Safety concerns on navigation within the Morgan Array Area

- 5.8.8.4 The MCA confirmed that the turbine layout needs to be agreed with them prior to construction to minimise the risks to surface vessels, including rescue boats and SAR aircraft operating within the site. As such, they will seek to ensure all structures are aligned in straight rows and columns, including any platforms.
- 5.8.8.5 The MCA also raised concerns relating to the cumulative impacts of the Morgan Generation Assets, Mona Offshore Wind Project and Morecambe Offshore Windfarm projects over loss of safe navigable sea space that would increase collision risk and the need for safety zones.
- 5.8.8.6 The Applicant can confirm that a commitment has been made to two lines of orientation in the layout of structures within the Morgan Array Area to address potential impacts on search and rescue and shipping and navigation. Agreement with the MCA will be reached prior to construction which will minimise the risk to airborne SAR operations operating within the Morgan Array Area.
- 5.8.8.7 The developers of the Morgan Generation Assets, Mona Offshore Wind Project and Morecambe Offshore Windfarm have recognised cumulative impacts on shipping and navigation to both commercial and safety receptors. As such, a Cumulative Regional Navigational Risk Assessment (CRNRA) was undertaken collaboratively (Volume 4, Annex 7.1: Cumulative regional navigational risk assessment of the Environmental Statement). Following the PEIR and consultee responses, all three Projects have committed to modifications to the boundaries to increase searoom and minimise these impacts to shipping and navigation stakeholders. The effects to the changes to the boundaries are reflected in the updated Navigational Risk Assessment (NRA) (Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement) and shipping and navigation chapter (Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement) submitted as part of the Application.
- 5.8.8.8 The application and use of safety zones will be in accordance with the Safety zone statement (Document Reference J5). These will consist of 500 m from platform/wind turbines edge (at sea level) undergoing active construction or major maintenance. Applied risk controls, including safety zones, are described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement.

Regulatory and informational requirements UXO clearance

- 5.8.8.9 The MMO confirmed that Consent for UXO clearance is usually the subject of a separate Marine Licence application. They established that whether as part of the DCO application or a separate Marine Licence, the MMO expects to see supporting evidence and an appropriate assessment of impacts to fish from UXO to be presented for review. Natural England requested that sufficient information is included in the application to assess the size and depths of craters.
- 5.8.8.10 Potential impacts associated with UXO clearance are assessed in Volume 2, Chapter 3: Fish and shellfish ecology and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.3 and F2.4). The dDCO (Document Reference C1) submitted with the application for consent secures the requirement to provide the regulator with a UXO clearance method statement and

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Marine mammal mitigation protocol (Document Reference J17) for approval prior to commencement of clearance activities. The consideration of UXO craters is included in the assessment of temporary habitat disturbance/loss in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

Clearly defined parameters and MDS required

- 5.8.8.11 Feedback was received which relates to the parameters and MDS within the PEIR and the need for these to be clearly defined within the submission. Natural England and NRW both noted that the sandwave clearance was exceptionally large and should be minimised and NRW advised that cable protection measures should be minimised as much as possible.
- 5.8.8.12 Since the submission of the PEIR the MDS have been refined and are clearly defined and presented in Volume 1, Chapter 3: Project description of the Environmental Statement. The Applicant can confirm that the volume of sandwave clearance and cable protection required has been refined from the PEIR to the Environmental Statement. The proportion of inter-array cables requiring sandwave clearance has reduced from 50% to 40% and the sandwave clearance width along inter-array cables has reduced from 104 m to 80 m. This subsequently reduces the sandwave clearance and seabed preparation total volume in the Morgan Array Area (inter-array cables, interconnector cables and foundations) by 24% (from 24,053,910 m³ to 18,236,920 m³). The MDS for inter-array cable installation has reduced the length of cables requiring cable protection to 39 km. This has subsequently reduced the overall area and volume of cable protection to 390,000 m² and 585,000 m³ respectively.
- 5.8.8.13 The Applicant has considered the consultation responses and key changes made to the project description are set out in Table 5.13. Full details of the project description can be found in Volume 1, Chapter 3 of the Environmental Statement (Document Reference F1.3).

5.8.9 Site selection and consideration of alternatives (PEIR Volume 1, Chapter 4)

- 5.8.9.1 Feedback regarding site selection and alternatives was provided by the Isle of Man Government, Ørsted, T&C Laycock and members of the public.
- 5.8.9.2 Members of the public provided feedback which related to the siting of the Morgan Array Area in the sea between the Isle of Man and England and the impact on shipping and lifeline services. This has been reported in the Shipping and Navigation summary in section 5.8.17 below.
- 5.8.9.3 The Isle of Man Government and Ørsted both raised the need for the cumulative assessment to include other offshore windfarms. This is dealt with the EIA methodology summary in section 5.8.10 below.
- 5.8.9.4 T&C Laycock confirmed they had no issues with the wind farm itself but gave feedback relating to onshore aspects. These comments have been passed on to the Applicant team for the Morgan and Morecombe Offshore Wind Farms: Transmission Assets.
- 5.8.9.5 Feedback received solely against this topic, alongside the Applicant's response can be seen in Appendix D.24.4.

5.8.10 Environmental Impact Assessment methodology (PEIR Volume 1, Chapter 5)

- 5.8.10.1 Feedback was received from a number of stakeholders including Natural England, MMO, NRW, North West Wildlife Trust (NWWT), other sea users, commercial operators and recreational users.
- 5.8.10.2 The key issues raised relevant to the EIA methodology which have been identified during the statutory consultation activities undertaken for the Morgan Generation Assets to date include:
- The consenting strategy for the Morgan Generation Assets and how the transmission assets infrastructure will be incorporated into the EIA.
 - Inclusion of the Isle of Man Offshore Wind Farm, now known as Mooir Vannin Offshore Wind Farm, in the cumulative impact assessment.
- 5.8.10.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.5.

Summary of Feedback and Applicant Response

The consenting strategy for the Morgan Generation Assets and how the transmission assets infrastructure will be incorporated into the EIA

- 5.8.10.4 The Applicant is submitting a stand-alone DCO application to consent the construction, operations/maintenance and decommissioning of the generation assets of the Morgan Offshore Wind Project and a separate application to consent the construction, operations and maintenance and decommissioning of the transmission assets. The cumulative assessment approach has been updated from PEIR to Environmental Statement to assess the two elements of the project (generation and transmission) cumulatively. The Cumulative Effects Assessment (CEA) takes into account the impact associated with the Morgan Generation Assets together with the Morgan and Morecambe Offshore Wind Farms Transmission Assets.
- 5.8.10.5 The Applicant was asked to present information to demonstrate how the two elements of the Project (generation and transmission) would be considered and assessed cumulatively when they are being considered within separate DCO applications.
- 5.8.10.6 The three staged approach below sets out how this cumulative assessment for the Morgan Offshore Wind Project (Morgan Generation Assets and the Transmission Assets) has been undertaken and presented within the CEA section of each assessment chapter. The cumulative assessment considers three scenarios:
- 1) Assessment of the Morgan Generation Assets, together with the Transmission Assets: presents a full project assessment for the Morgan Offshore Wind Project which includes both the generation and transmission assets
 - 2) Assessment of the Morgan Generation Assets, together with the Transmission Assets and the Morecambe Generation Assets: presents a full project assessment for all infrastructure associated with the Morgan Offshore Wind Project, the Morecambe Offshore Windfarm and the Transmission Assets
 - 3) Assessment of the Morgan Generation Assets, together with the Transmission Assets with all other relevant projects: presents the cumulative assessment scenario of the Morgan Generation Assets and Transmission Assets

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together with all relevant screened-in projects from the cumulative effects assessment long list.

- 5.8.10.7 The CEA methodology is described further in Volume 1, Chapter 5: EIA methodology of the Environmental Statement (Document Reference F1.5).

Inclusion of the Moir Vannin Offshore Wind Farm in the cumulative impact assessment.

- 5.8.10.8 Ørsted raised the importance of ensuring that all environmental impacts of the Morgan Offshore Wind Project: Generation Assets are properly and fully assessed including any potential cumulative or in combination effects with the Moir Vannin Offshore Wind Farm.

- 5.8.10.9 In the absence of a publicly available scoping report Moir Vannin was included as a Tier 3 project in the PEIR. Following the statutory consultation on the PEIR, the Moir Vannin developer, Ørsted, made project information available to the Applicant in advance of their scoping report being issued on 18 October 2023. The Applicant can confirm that the Moir Vannin Offshore Wind Farm (scoping boundary) is considered in the more detailed CEA at Tier 2, using the information provided in the associated Scoping Report.

5.8.11 Physical processes (PEIR Volume 2, Chapter 6)

- 5.8.11.1 Feedback in relation to physical processes was received by the MMO, Natural England, NRW, Trinity House Lighthouse Service (THLS), NNWT and the Isle of Man Government. As part of the EPP and wider technical engagement activities, the Benthic Ecology, Fish and Shellfish and Physical Processes EWG was established with representatives from the key regulatory bodies and their advisors (see Table 4.3 for participants).

- 5.8.11.2 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.6.

- 5.8.11.3 The key issues raised relevant to physical processes, which have been identified during the statutory consultation include:

- Potential impacts of significant amounts of sandwave clearance, seabed preparation and cable protection within the array site.

Summary of Feedback and Applicant Response

Potential impacts of significant amounts of sandwave clearance, seabed preparation and cable protection within the array site

- 5.8.11.4 In response to the PEIR, Natural England raised concerns over the extent of sandwave clearance required to install the cables and infrastructure within the seabed footprint proposed by the Morgan Generation Assets. Natural England advised that all efforts should be made to avoid areas of sandwaves or that the need for clearance should be minimised by micro-routing cables. Natural England noted that suction hopper dredging has been identified as the primary dredging method for sandwave clearance and welcomed the return of cleared material to the system from which it was removed.

- 5.8.11.5 Refinement of project parameters has been undertaken since submission of the PEIR, to include the refinement of cable corridor widths which has significantly reduced the volumes of sandwave clearance across the array site. It is noted within Volume 2,

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Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1), that sandwaves will not be flattened; and will be reduced in height to allow passage of the burial tool to enable cable burial to a sufficient target depth. The Morgan Generation Assets has committed that material arising from sandwave clearance will be sidecast in the vicinity of the sandwave as the burial tool passes through, therefore making this material readily available for redistribution and sandwave recovery within the sediment cell.

5.8.12 Benthic subtidal ecology (PEIR Volume 2, Chapter 7)

- 5.8.12.1 Feedback on matters relating to Benthic subtidal ecology including the MMO, Natural England, NRW, NWWT and the Isle of Man Government and nearly 20 members of the public. As part of the EPP and wider technical engagement activities, the Benthic Ecology, Fish and Shellfish and Physical Processes EWG was established with representatives from the key regulatory bodies and their advisors (see Table 4.3 for participants).
- 5.8.12.2 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.7.
- 5.8.12.3 The key issues raised relevant to benthic subtidal ecology, which have been identified during the statutory consultation include:
- Potential in-combination effects due to sandwave clearance at the Morgan, Mona and Morecambe array sites.
 - Potential impacts of long term habitat loss and introduction of hard substrates to a predominantly soft sediment environment due to cable protection.
- 5.8.12.4 Members of the public raised general concern over the impacts on marine ecology and questioned the assessments being undertaken.

Summary of Feedback and Applicant Response

Potential in-combination effects due to sandwave clearance at the Morgan, Mona and Morecambe array sites

- 5.8.12.5 In response to the PEIR, NRW raised concerns regarding the assessment of the effects of sandwave clearance independently for the Morgan Array Area, and only in relation to Suspended Sediment Concentration (SSC) plumes and sediment deposition following disturbance. Whilst NRW agreed that that the SSC plumes arising from the sandwave clearance and cable installation activities at the Morgan Array Area or impact on any designated features in Welsh Waters, the impact to bedload sediment transport processes and the regional sediment budget should be assessed in-combination (Morgan Generation Assets, Mona Offshore Wind Project and Morecambe Offshore Wind Farm array sites) and considered in line with other receptor groups, i.e. fish and benthic habitats, as physical processes are a pathway for impacts to other receptor groups.
- 5.8.12.6 Since submission of the PEIR, the structure of the CEA has been adjusted to ensure the proportionate and clear assessment of the Morgan Generation Assets in combination with the Morgan and Morecambe Transmission Assets, Morecambe Offshore Wind Farm and Mona Offshore Wind Project and other cumulative projects. The impact of changes in physical processes on benthic habitats is assessed in Section 2.9.9, and cumulatively in Section 2.11.8, of Volume 2, Chapter 2: Benthic subtidal ecology chapter of the Environmental Statement (Document Reference F2.2).

Potential impacts of long term habitat loss and introduction of hard substrates to a predominantly soft sediment environment due to cable protection

- 5.8.12.7 In response to the PEIR, NRW and the NWWT raised concerns that the Morgan Generation Assets Array site represented a large area of potential benthic surface change and that the introduction of infrastructure at this scale into a predominantly soft sediment benthic environment would see a hard substrate created as a consequence of the cumulative impact. NRW advised that given the intention to leave the rock in situ upon decommissioning, permanent presence of the rock would potentially alter the seabed sediment transport processes leading to permanent alterations to the seabed morphodynamics. This could have potential cumulative impacts to the sediment transport systems of the north Wales coast, causing further impacts to receptors within Welsh Waters and Welsh protected sites. NRW strongly advised that cable protection measures should be minimised as much as possible for both sites (Morgan and Mona). The NWWT advised to avoid cable protection where possible in soft sediments.
- 5.8.12.8 Refinement of project parameters has been undertaken since submission of the PEIR. From PEIR to Environmental Statement the area of seabed affected by placement of cable protection for the Morgan Generation Assets has reduced from 620,000 m² to 510,000 m². Section 2.8 of Volume 2, Chapter 2: Benthic subtidal ecology chapter of the Environmental Statement (Document Reference F2.2) details the commitment to cable burial where possible which will enable the minimum amount of cable protection to be placed on the seabed.

5.8.13 Fish and shellfish ecology (PEIR Volume 2, Chapter 8)

- 5.8.13.1 Feedback was received on matters relating to Fish and shellfish ecology from the MMO, Natural England, NRW, NWWT, the Isle of Man Government, and the NFFO, Welsh Fishermen's Association (WFA) and commercial fisheries representatives and members of the public. As part of the EPP and wider technical engagement activities, the Benthic Ecology, Fish and Shellfish and Physical Processes EWG was established with representatives from the key regulatory bodies and their advisors (see Table 4.3 for participants).
- 5.8.13.2 The key issues raised relevant to Fish and shellfish ecology, which have been identified during the statutory consultation include:
- Potential impacts of underwater sound on cod and herring spawning grounds
 - Inclusion of heat maps in the assessment of herring and spawning suitability
 - Suitability of using the potentially outdated Coull et al. (1998) and Ellis et al. (2012) as data sources to characterise fish and shellfish spawning grounds.
- 5.8.13.3 Feedback was also received regarding overarching concerns on the impact on marine life and the potential impact upon fish and shellfish ecology in general.
- 5.8.13.4 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.8. Feedback which was received which related specifically to underwater sound can be seen at Appendix D.24.9.

Summary of Feedback and Applicant response

Potential impacts of underwater sound on cod and herring spawning grounds

- 5.8.13.5 In response to the PEIR, the MMO raised concerns regarding the potential impacts of underwater sound from piling activities on herring and cod spawning grounds. There were concerns that the 135 decibel (dB) behavioural effect threshold noise contour for mono-piling overlaps much of the known Isle of Man herring spawning ground, and that piling activities could interfere with herring spawning activities including aggregating, spawning and laying eggs, which could result in avoidance of the spawning grounds or reduced spawning success.
- 5.8.13.6 In addition, the MMO noted that the underwater sound contours show in figures within the PEIR have significant overlap with high intensity Atlantic cod spawning grounds. Therefore, the MMO considered that piling works could have potentially significant impacts to cod at the population level if piling was to occur during their spawning season (1 January to 30 April inclusive). The MMO recommended that the Applicant conduct a detailed assessment for the impacts of underwater sound from piling using the most recent evidence/data for Atlantic cod, including the potential impacts to eggs and larvae. Further, the MMO recommended modelling for the SPL_{peak} of 207dB for eggs and larvae following a worst-case scenario.
- 5.8.13.7 The MMO raised that they would recommend temporal mitigation in the form of a piling restriction during the Isle of Man herring spawning season (1 September to 31 October inclusive). However, they requested more certainty in the underwater sound assessment before providing confirmation that the suggested mitigation is appropriate and recommended that additional noise reduction mitigation is used in the form of bubble curtains (see Würsig et al., 1999), or other alternative measures.
- 5.8.13.8 Since the submission of the PEIR, the project parameters have been refined to reduce the potential sound impacts from the Morgan Generation Assets. Monopiles have been removed from the project design and the maximum hammer energy to be used for installing piled foundations has been reduced from 5,500 kJ to 4,400 kJ. Updated underwater sound modelling was undertaken for the Environmental Statement and presented in Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement (Document Reference F3.3.1). Further information is presented within the assessment for underwater sound impacts from pile driving to provide more certainty in the data, including mapped contours for concurrent piling and contours presented with herring larval density data, to support visual interpretation of the data.
- 5.8.13.9 The Applicant has committed to the development of, and adherence to, an underwater sound management strategy to investigate options to manage underwater sound levels (such as noise abatement systems, temporal and spatial piling restrictions, piling methods, soft start) in order to reduce the magnitude of the impact from the Morgan Generation Assets. An Outline underwater sound management strategy (Document Reference J13) has been submitted with the application for consent.
- 5.8.13.10 Furthermore, the impacts of piling on cod spawning have been fully assessed within the Environmental Statement, in light of revised design parameters and underwater sound modelling, and further evidence to support assessment of eggs and larvae has been sought to add further detail to the information presented within the Environmental Statement.

Inclusion of heat maps in the assessment of herring and spawning suitability

- 5.8.13.11 In response to the PEIR, the MMO has requested that the herring and sandeel suitability assessments include heat maps of sandeel and herring density data, with 'prime' and 'sub-prime' suitability also being changed to follow more relevant guidance.
- 5.8.13.12 Since the submission of the PEIR, the existing habitat suitability has been changed to 'preferred', 'marginal' and 'unsuitable' to align with the categories derived from EMODnet seabed substrates data (EMODnet, 2024). Heat mapping separately for each year was deemed to be unsuitable due to low data values and density. Instead, a 10-year aggregated dataset was mapped, as agreed with the Benthic Ecology, Fish and Shellfish and Physical Processes EWG after meeting four on 11 July 2023. This is presented in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1).

Suitability of using the potentially outdated Coull et al. (1998) and Ellis et al. (2012) as data sources to characterise fish and shellfish spawning grounds

- 5.8.13.13 In response to the PEIR, the Isle of Man Government, and the NFFO and WFA raised concerns over the suitability of using the potentially outdated Coull et al. (1998) and Ellis et al. (2012) sources to characterise fish and shellfish spawning grounds within the fish and shellfish ecology study area, with the recommendation to use more recent references.
- 5.8.13.14 These sources have been used extensively throughout the Environmental Statement. Since submission of the PEIR, they have been checked against recent literature and long-term studies in the baseline environment to confirm they remain up to date and representative of current fish and shellfish population distributions.

Overarching response to comments

- 5.8.13.15 The fish and shellfish baseline characterisation, as presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) uses a number of information sources, including long term repeated regional survey effort, data collected within the wider region at other offshore wind farm developments and published literature to ensure a current baseline is provided. Utilising this baseline a detailed assessment has been conducted to fully appraise the potential impacts to marine life, including fish and shellfish, and identify any mitigation measures or monitoring required to minimise any potential impacts.

5.8.14 Marine mammals (PEIR Volume 2, Chapter 9)

- 5.8.14.1 Feedback on matters relating to marine mammals were received from the MMO, Natural England, NRW, NWWT, the Isle of Man Government and over 15 members of the public. As part of the EPP and wider technical engagement activities, the Marine Mammals EWG was established with representatives from the key regulatory bodies and their advisors (see Table 4.3 for participants).
- 5.8.14.2 The key issues raised relevant to marine mammals, which have been identified during the statutory consultation activities undertaken for the Morgan Generation Assets to date include:
- Potential impacts of underwater sound generated by piling activities

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- Further assessment to support conclusions related to impacts from underwater sound from vessels
- Baseline characterisation
- Sound mitigation measures

5.8.14.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.10. Feedback which was received which related to underwater sound can be seen at Appendix D.24.9.

Summary of Feedback and Applicant Response

Potential impacts of underwater sound generated by piling activities

5.8.14.4 NRW raised concerns in their consultation response regarding the potential impacts of underwater sound from piling activities on marine mammals, in particular harbour porpoise. There were concerns that only the Effective Deterrent Range (EDR) approach was used for the assessment of disturbance associated with piling to assess impacts on harbour porpoise in the North Anglesey Marine SAC. Based on the modelled contours provided in the PEIR, NRW noted that absence of an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopile foundations could not be ruled out. NRW recommended that when assessing the area disturbed for harbour porpoise, an unweighted noise threshold of 143 dB re 1 μ Pa (or 103 dB re 1 μ Pa VHF-weighted) single strike sound exposure level (Brandt et al., 2018; Heinis et al., 2019) should be used, in parallel to EDRs, to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive sound sources.

5.8.14.5 NRW disagreed with the assumption that the extent of behavioural disturbance from piling is likely to be an overestimate due to noise losing its impulsive characteristics with range. This argument is valid when estimating impact ranges for permanent threshold shift (PTS) / temporary threshold shift (TTS), though not when assessing behavioural disturbance based on dose response curves as these are obtained from field observations where animals may react to the noise they receive at their location.

5.8.14.6 Since the submission of the PEIR, the project parameters have been refined to remove monopile foundations, and the assessment approach of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1 μ Pa (or 103 dB re 1 μ Pa VHF-weighted) which is based on a collation of field studies of harbour porpoise response to elevated underwater sound from piling, has been presented in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). This represents a fixed sound threshold at which significant disturbance could occur, any behavioural effects beyond this point are likely to be mild. This has been carried forward to the HRA and presented alongside the EDR as an area-based threshold for the purposes of understanding potential overlap with SAC habitat as agreed with the marine mammal EWG after meeting five on 03 August 2023.

Further assessment to support conclusions related to impacts from underwater sound from vessels.

5.8.14.7 In response to the PEIR, NRW raised concerns regarding potential inaccuracies and assumptions associated with impacts from underwater sound from vessels, including the need for further explanation of how additional project vessels may cause

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disturbance to marine mammals and the use of the term habituation to disturbance when assessing impact from underwater sound due to vessels.

- 5.8.14.8 As a result of the feedback on the assumptions around marine mammal habituation to sound from vessels, the language regarding use of the terminology 'habituation to disturbance' has been amended. Additional discussion in relation to Wisniewska (2018) and other relevant studies from the published literature have been provided in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). Furthermore, Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) has considered a more detailed approach to assessing vessel sound to provide further quantification of the potential impacts. Empirical data has been gathered from field studies to determine realistic impact ranges and a quantification of the number of animals potentially affected based on densities of key species has been provided. In addition, further quantification of the baseline levels of activity are provided in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) to demonstrate any potential elevation in sound above background levels in the Morgan Array Area.

Baseline characterisation

- 5.8.14.9 Feedback from NRW raised concerns regarding the baseline densities of marine mammals used in the assessments, in particular for harbour porpoise and bottlenose dolphin.
- 5.8.14.10 Natural England raised concerns that the PEIR is based on incomplete data or refers to additional data collection still to be carried out and could therefore not make any conclusive judgements based on this PEIR.
- 5.8.14.11 The Isle of Man Government noted that Manx Marine Environmental Assessment, which provides an overview of the Island's marine environment, should be taken into account as part of both the transboundary and possibly also the cumulative impacts assessment. The Isle of Man Government also requested clarity around the seasonality of marine mammal densities, whether densities were truly seasonal, or an artifact of survey effort.
- 5.8.14.12 Isle of Man Government requested specific evidence of the consideration of Risso's dolphins, unless there is no intention or expectation of construction piling in summer months when Risso's occurrence is highest in Manx waters. The Applicant can confirm that the impact assessment set out in Volume 2, Chapter 4: Marine mammals of the Environmental Statement has been revisited and further justification for the conclusions of the assessment have been provided where required.
- 5.8.14.13 Since the submission of the PEIR, the densities from Evans and Waggitt (2023) have been provided by NRW and taken forward to Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). Subsequently the densities provided in the PEIR have been replaced with a more precautionary estimate from the updated Welsh Marine Mammal Atlas. All densities have been presented to and agreed with the Marine Mammal EWG.
- 5.8.14.14 Site-specific marine mammal surveys were completed in March 2023 for the Morgan Generation Assets, and associated data is presented in Volume 2, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement (Document Reference F2.4.1). Associated data informs the assessment presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement (Document Reference F2.4).

Sound mitigation measures

- 5.8.14.15 The MMO, NRW and Natural England, raised concern that use of sound mitigation measures were not proposed beyond the use of acoustic deterrent devices. Consideration of such measures was strongly advised. The MMO noted that the most direct and comprehensive way to mitigate the risk of acoustic impact on marine species is to reduce the amount of sound pollution emitted at source.
- 5.8.14.16 The Applicant has committed to implementing a mitigation hierarchy with regard to UXO clearance as follows: avoiding the UXO, clearance with low order methods (i.e. not detonation) and lastly clearance through detonation. In addition, the Applicant has also committed to the development and adherence to a marine mammal mitigation protocol which requires implementation of an initiation stage of a piling soft start and ramp-up, a minimum separation limit of 1.4 km and maximum separation limit of 15 km for concurrent piling. These measures are set out in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).
- 5.8.14.17 The assessment of effects has determined that there are no significant impacts predicted on marine mammals for the Morgan Generation Assets alone with the exception of on harbour porpoise in the event of detonation of the absolute maximum size of potential UXO. In addition, a significant effect is predicted on bottlenose dolphin in the Irish Sea from injury and disturbance from elevated underwater sound generated during piling in combination with other plans and projects.
- 5.8.14.18 The Applicant has developed an Outline marine mammal mitigation protocol (Document Reference J17) which presented the range of measures adopted as part of the project to reduce or eliminate the risk of auditory injury effects of underwater sound. The Applicant has prepared an Outline underwater sound management strategy (Document Reference J13) which establishes a process of investigating options to manage underwater sound levels, in consultation with the licensing authority and SNCBs and agreeing prior to construction, mitigation measures that will be implemented to reduce the magnitude of impacts such that there will be no residual significant effect from the project. The options will continue to be explored for mitigating piling sound post consent, at a time when more detailed information is available (i.e. geotechnical data) and where further refinements to the Morgan Generation Assets design have been made on this basis. A commitment to noise abatement systems might be considered as part of a stepped strategy post consent and following the mitigation hierarchy.

5.8.15 Offshore ornithology (PEIR Volume 2, Chapter 10)

- 5.8.15.1 The Applicant received feedback from a number of stakeholders on matters relating to offshore ornithology including the MMO, Natural England, NRW, the Wildlife Trust Wales (WTW), the Isle of Man Government, other Irish Sea wind farm operators and members of the public. As part of the EPP and wider technical engagement activities, the offshore ornithology EWG was established with representatives from the key regulatory bodies and their advisors (see Table 4.3 for participants).
- 5.8.15.2 The key issues raised relevant to offshore ornithology which have been identified during the statutory consultation include:
- Apportioning of unidentified species
 - Isle of Man designated sites
 - Baseline data

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- Cumulative and in-combination assessments of historic projects.

5.8.15.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.11.

Summary of Feedback and Applicant Response

Apportioning of unidentified species

5.8.15.4 In response to the PEIR, NRW raised concerns over the number of birds recorded as 'guillemot/razorbill' where analysis of the site specific survey data could not distinguish between the two similar species, particularly as this was the second most frequently recorded species group. NRW questioned whether apportioning guillemot/razorbill to the individual species based on proportions of identified guillemots and razorbills was appropriate, as it could introduce biases. Apportioning may overestimate numbers of the easily identified species and correspondingly underestimate numbers of the less easily identified species.

5.8.15.5 Similarly, Natural England raised concerns over the use of model-based abundance estimates and recommended that the Environmental Statement should include more detailed methodology, including corrections for the apportionment of unidentified birds and availability bias and the generation of birds in flight densities for use in collision risk modelling.

5.8.15.6 Auk (including guillemot and razorbill species) identification rates were revised upward by the specialist site specific survey contractor (APEM) following further quality assurance of images. As a result, the apportioning in the Environmental Statement is based on a smaller proportion of unidentified auk species than presented in the PEIR. This was presented and agreed with the offshore ornithology EWG. A breakdown of all unknown groups and the number of birds recorded is provided in Volume 4, Annex 5.1: Offshore ornithology baseline characterisation technical report of the Environmental Statement (Document Reference F4.5.1). The technical report provides further clarity on how unknown birds were apportioned, including unidentified gulls, skuas, petrels, terns, thrushes and wader species.

Isle of Man designated sites

5.8.15.7 The Isle of Man Government also noted that apportionment of effects on seabirds, has been made with respect to SPAs specifically, but pointed out that the Isle of Man does not have a system of SPAs and there had, as yet, been no assessment for sites of European interest under the Bern Convention. Given that the Isle of Man has the closest breeding seabird colonies to the Morgan Array Area they were looking for assurance that Isle of Man populations are not placed at risk, and would like non-SPA sites to be included in the assessment.

5.8.15.8 Designated sites within the Isle of Man territorial waters, and their associated species, have been considered and documented in the assessment process within Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5). As they are not designated under the Habitats Regulations assessment, they are not considered within the HRA Stage 2 ISAA.

Baseline data

5.8.15.9 Natural England also raised a concern that the PEIR was based on incomplete data or referred to data not yet available for inclusion for several receptors and therefore

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they could not make conclusive judgements based on the PEIR. The need to base the Environmental Statement on robust datasets that meet (and where appropriate exceed) minimum standards, for example data from at least 24-monthly offshore ornithology surveys was emphasised.

- 5.8.15.10 In response to Natural England comments, the Applicant can confirm that data from 24 months of digital aerial surveys have been incorporated throughout Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference F4.5.1) Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) and the HRA Stage 2 ISAA (Document Reference E1.1 to E1.3).

Cumulative and in-combination assessments of historic projects

- 5.8.15.11 Natural England and NRW raised a concern that the cumulative and in-combination assessments do not factor in impacts from a number of other projects due to a lack of data. It was highlighted that impacts specified as ‘unknown’ were treated as zero which would underestimate impacts. As a result, Natural England considered it inappropriate to comment on the potential significance of cumulative or in-combination assessments presented in the PEIR submission. Natural England advised that estimates need to be generated for the unknown projects to undertake meaningful assessments.
- 5.8.15.12 Natural England and NRW proposed working collaboratively with stakeholders, through the EWG, to generate suitable impact estimates for historic projects in the cumulative and in-combination assessments.
- 5.8.15.13 The Applicant considers that it is not appropriate to estimate impacts for other projects. Robust modelling relies on wind farm parameters and project specific abundances, something which is not available for historical projects if the information is not published. The Secretary of State has been able to conclude that other such developments would not have an Adverse Effect on Integrity (AEoI) on European sites without similar information being provided. The Applicant has added a more detailed qualitative assessment of offshore wind projects where data is not available to the assessment with other projects and plans. This approach has been developed to ensure that the assessments are robust and provide sufficient detail to conclude no significant effects within the Environmental Statements and no AEoI beyond reasonable scientific doubt for the purposes of the HRA.

5.8.16 Commercial fisheries (PEIR Volume 2, Chapter 11)

- 5.8.16.1 Feedback received on matters relation to commercial fisheries was received from the MMO, Isle of Man Government, NFFO, WFA, Scottish Fisherman’s Federation (SFF), relevant fish producer organisations and other fisheries representatives as well as individual fishers, nature conservation bodies and non-governmental organisations and other sea users who operate in the area (including other energy developers) and members of the public.
- 5.8.16.2 As part of the wider technical engagement activities, the project established a Fisheries Liaison Officer and Fishing Industry Representative to help facilitate ongoing engagement with commercial fisheries stakeholders.
- 5.8.16.3 The key issues raised relevant to commercial fisheries which have been identified during the statutory consultation include:
- The potential for impact on the Queen Scallop Fishery

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- Data to inform the commercial fisheries assessment
- Spatial squeeze on commercial fisheries associated with the cumulative effects of the Morgan Generation Assets
- Importance of coexistence.

5.8.16.4 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.12.

Summary of Feedback and Applicant Response

Potential for Impact on the Queen Scallop Fishery

5.8.16.5 In response to the PEIR, West Coast Sea Products Ltd, South Western Fish Producers Organisation (SWFPO), the SFF and NFFO as well as comments from members of the public, expressed concerns about the potential impacts of construction of the Morgan Generation Assets on queen scallop habitat. The west section of the Morgan Array Area is located within established queen scallop grounds, on which scallop fisheries are highly reliant for annual income. There was concern that potential impacts of offshore wind farm development on shellfish ecology are not currently well understood. Responses flagged concern for alteration of some areas of the ground to rocky ground and if rock dumping is required, as this could alter preferred queen scallop habitat sediment types from the prime gravelly/sandy.

5.8.16.6 Further data and literature sources have been included in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) to support the evidence base defining the sensitivity of queen scallop. The assessment parameters have been reviewed, and appropriate mitigation or monitoring measures recommended including commitment to an area free of surface infrastructure, termed the scallop mitigation zone over an area of core scallop grounds within the Morgan Array Area and minimum spacing between rows of turbines of 1.4 km to increase the potential for co-existence and co-location. The Applicant has committed to the use of rolling advisory safety zones to avoid the entire Morgan Array Area being closed to fishing vessels during the construction phase.

5.8.16.7 Commercial fisheries stakeholders have engaged with and provided advice to the Applicant on measures to help facilitate coexistence of the scallop fishery within the Morgan Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan is being developed by the Applicant through ongoing consultation with fisheries stakeholders. An outline of this plan has been included with the application (Document Reference J10). Mitigation and monitoring commitments are also set out within the Environmental Statement chapters and the Mitigation and monitoring schedule (Document Reference J6).

Data to inform the assessment

5.8.16.8 In their response the Isle of Man Government commented on the data that had been used to inform the assessment and availability of Isle of Man Vessel Monitoring System (VMS) data, particularly under-15 metre vessel data. The Isle of Man Department of Infrastructure outlined the requirement for all vessels targeting scallops irrespective of size to carry VMS since 2015.

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5.8.16.9 The Applicant has obtained relevant VMS data from the Isle of Man Government, which provides comprehensive coverage of Manx vessels, of all sizes, in the region. This data has now been incorporated into the Commercial fisheries technical annex of the Environmental Statement (see Volume 4, Annex 6.1: Commercial fisheries technical report (Document Reference F4.6.1)) and has been considered in the commercial fisheries assessment (see Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6)).

Spatial squeeze on commercial fisheries associated with the cumulative effects of the Morgan Generation Assets

5.8.16.10 The MMO, West Coast Sea Products Ltd and NFFO, along with the SWFPO, SFF and NIFPO expressed concerns regarding displacement of fishing vessels from within the Morgan Array Area during operation and the potential long term cumulative effects of loss of fishing access due to marine development and potential issues of cross industry conflict in areas outside of the wind farm site. Commercial fisheries stakeholders have engaged with and provided advice to the Applicant on measures to help facilitate coexistence of the scallop fishery within the Morgan Array Area. The Applicant is working to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible.

5.8.16.11 Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6) has also been updated to reflect the limited spatial adaptability for scallop fisheries. The cumulative effects section of this chapter considers the potential effects associated with spatial squeeze when assessing the Morgan Generation Assets cumulatively with other relevant plans and projects.

Importance of coexistence

5.8.16.12 Due to the potential impacts associated with displacement and spatial squeeze, commercial fisheries stakeholders have highlighted in their responses to consultation the importance of facilitating coexistence as far as possible to allow for continued fishing within the Morgan Array Area.

5.8.16.13 West Coast Sea Products Ltd along with the SWFPO and SFF have engaged with the Applicant from an early stage to highlight key areas where their fishing vessels operate within the Morgan Array Area and to discuss potential design measures that will help facilitate coexistence.

5.8.16.14 In response to this, the Applicant has made a number of project changes and commitments including the commitment to operating a scallop mitigation zone, discussed above, which were discussed with commercial fishing stakeholders in September and October 2023. Additional project changes and commitments made to minimise disruption to commercial fishing stakeholders and promote co-existence and co-location include; increasing the minimum spacing between offshore surface structures and alignment of offshore surface structure rows to a roughly north to south alignment to match the predominant fishing gear towing orientations in this area.

5.8.16.15 The Applicant is working to facilitate co-existence with commercial fishing stakeholders and minimise disruption as far as is practicably possible. Early engagement was established with fisheries stakeholders in June 2021 and is anticipated to continue throughout the lifetime of the project. A Fisheries Liaison and Coexistence Plan will be developed post-consent by the Applicant with input from with commercial fisheries stakeholders. An outline of this plan has been included with the Application (Document Reference J10).

5.8.17 Shipping and navigation (PEIR Volume 2, Chapter 12)

- 5.8.17.1 The Applicant received feedback from a number of stakeholders on matters relating to shipping and navigation including the MCA, THLS, UK Chamber of Shipping, Isle of Man Government, commercial operators and ferry services, energy developers (offshore wind farms and oil and gas) and recreational users, including residents from the Isle of Man who rely on the ferry services.
- 5.8.17.2 As part of the EPP and wider technical engagement activities, the MNEF was established with representatives from key regulatory bodies and shipping and navigation stakeholders.
- 5.8.17.3 The key issues raised relevant to shipping and navigation which have been identified during the statutory consultation include:
- Cumulative impacts of the Morgan Generation Assets with other existing and proposed offshore wind farms within the Irish Sea on safety of navigation
 - Navigation safety around the Morgan Generation Assets during the Operation and Maintenance phase
 - Potential impacts to commercial operators and ferry services including route deviations, delays and cancellations
 - Potential impact on the lifeline services for the Isle of Man which are reliant on shipping and navigation routes.
- 5.8.17.4 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.13.

Summary of Feedback and Applicant Response

Cumulative impacts of the Morgan Generation Assets with other existing and proposed offshore wind farms within the Irish Sea

- 5.8.17.5 In response to the consultation the MCA, UK Chamber of Shipping, Isle of Man Government and ferry operators (including Stena Line, Isle of Man Steam Packet Company and Seatruck Ferries (now known as CLdN RoRo Ltd as of 19 February 2024)) raised concerns about the cumulative impacts of the Morgan Generation Assets together with the other proposed Round 4 offshore wind farms within the Irish Sea (Mona Offshore Wind Project, Morecambe Offshore Windfarm: Generation Assets and the joint Transmission Assets with Morgan Generation Assets) on safety of navigation in the area, specifically on the reduction of safe navigable sea space and increased collision risk. The MCA highlighted that traffic density is significant within the Irish Sea with strategically important passenger and cargo routes between the UK, Isle of Man, Northern Ireland and the Republic of Ireland. Concern was raised regarding the Morgan Array Area boundary as presented within the PEIR, which was considered likely to lead to unacceptable risks to navigational safety (passenger and cargo routes) when considered cumulatively with the other offshore wind farm projects.
- 5.8.17.6 The PEIR set out that a number of commitments were being made to reduce the potential cumulative impacts on safety of navigation. Following the PEIR and consultation responses, the Morgan Generation Assets committed to modifications of the array boundary which increased the searoom around the Morgan Array Area to reduce the risk and impacts on navigational safety. The Applicant has worked together with the developers of the Mona Offshore Wind Project and Morecambe Offshore Windfarm who have also made commitments to amending the boundary of the array

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areas for their respective projects to increase searoom and reduce the cumulative impacts on navigational safety. A CRNRA was undertaken collaboratively and was contained within the PEIR. Following the PEIR and consultation responses, all three Projects have committed to modifications to the boundaries to increase searoom and minimise these impacts to shipping and navigation stakeholders. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the CRNRA, an appendix to the updated NRA, (Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1)) and Environmental Statement Chapter (Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7)) submitted as part of the Application.

Shipping and navigational safety around the Morgan Generation Assets during the operation and maintenance phase

- 5.8.17.7 Several stakeholders including the Isle of Man Government and commercial ferry operators highlighted concerns around the potential for increases in vessel encounters as a result of the proposed deviation around the Morgan Array Area during the operations and maintenance phase. This was highlighted in particular respect of a ferry – small craft collision which exhibited a 75% increase. Concerns were expressed by ferry operators that the NRA published in the PEIR concludes that Morgan Generation Assets creates hazards with unacceptable risks to navigational safety and fail requirements in both NPS EN-3 2.8.331 and MGN 654 Annex 1. This was also a key finding of the CRNRA (see Appendix E of the NRA).
- 5.8.17.8 The array area revisions made by the Applicant, and other proposed projects discussed above, has increased available searoom between the projects which has reduced the navigational risks reported in the PEIR. The NRA for the Environmental Statement has concluded that following the changes to the Morgan Potential Array Area made post-PEIR, all hazards associated with the Morgan Generation Assets have been reduced to either Medium Risk – Tolerable if ALARP or Broadly Acceptable. Whilst it was recognised that the construction of an offshore wind farm in otherwise navigable waters would increase the risks of collision and allision for navigating vessels, a consensus was reached with stakeholders that these risks were Tolerable if ALARP or Broadly Acceptable. In particular, the increase in searoom around the Morgan Array Area following changes to the project boundary provides sufficient space for vessels to safely manoeuvre in complex realistic traffic situations and adverse weather in full compliance with the COLREGs and the practice of good seamanship. These changes are reflected in Volume 4 Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F4.7.1) and Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7), submitted as part of the Application.

Potential impacts to commercial operators and ferry services including route deviations, delays and cancellations

- 5.8.17.9 The Isle of Man Government, UK Chamber of Shipping, commercial ferry operators and members of the public raised concerns about potential impacts of the Morgan Generation Assets (alone and cumulatively) on ferry routeing, additional delays and cancellations that may be experienced in both normal and adverse weather conditions. The NRA in the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Morgan Generation Assets and this would

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result in greater transit distance, fuel costs, schedule disruptions and more frequent cancellations to lifeline ferry services.

- 5.8.17.10 As set out above, following PEIR and consultation responses, the Morgan Generation Assets has committed to modifications of the array area boundary, which has increased the available searoom to minimise the impacts to lifeline ferries. This has reduced the deviations required and the number of potential cancellations. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 4, Annex 7.1: Navigation risk assessment of the Environmental Statement (Document Reference F4.7.1)) and Environmental Statement Chapter (Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7)) submitted as part of the Application. The Applicant has made substantial commitments to reduce these effects, including a reduction to the Morgan Array Area and additional control measures. Despite this, the assessment has concluded that a significant effect remains. The Applicant has committed to engaging with affected stakeholders. The Applicant will seek to continue this engagement beyond submission of the application and run in parallel with the application determination process.

Potential Impact on Lifeline Services to/from the Isle of Man

- 5.8.17.11 Concerns were raised by the Isle of Man Chamber of Commerce, Isle of Man Steam Packet Company, other stakeholders and members of the public about the potential impact of the Morgan Generation Assets on the lifeline services that the Isle of Man Steam Packet Company provide to the Isle of Man via the direct Heysham and Liverpool routes. The Isle of Man Chamber of Commerce raised concerns regarding the potential economic and societal impact that could result from disruption to the established sea routes between the Isle of man and the UK. They expressed concern that longer journey times could affect port turnaround for urgent freight and that in adverse weather conditions delays and cancellations could become more frequent which would impact on deliveries to the island as well as local and visitor transport. The Isle of Man Steam Packet Company, which operates the services between the UK and Isle of Man, raised concerns about disruption to their routes and the impact this would have on island supplies particularly during peak periods. Concerns were also expressed by members of the public (including residents of the Isle of Man) on the potential disruption to ferry services and impacts this would have on island supplies, travel and transport.
- 5.8.17.12 The NRA and Shipping and navigation chapter of the PEIR identified that in normal and adverse weather conditions, ferries would necessitate deviations around the Morgan Generation Assets and this would result in greater transit distance, fuel costs, schedule disruptions, and more frequent cancellations to lifeline ferry services. Following the PEIR and section 42 responses, the Morgan Generation Assets has committed to modifications of the boundaries which have increased the available searoom to minimise the impacts to lifeline ferries which have reduced the deviations required and the number of potential cancellations. The ferry companies and other key stakeholders have inputted to this process through attendance at navigation simulations and a hazard workshop. These changes are reflected in the updated NRA (Volume 4, Annex 7.1: Navigation risk assessment of the Environmental Statement, Document Reference F4.7.1) and Environmental Statement Chapter Volume 2, Chapter 7, Shipping and navigation (Document Reference F2.7), submitted as part of the Application.

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- 5.8.17.13 This information has informed the Socio-economics assessment (Volume 2, Chapter 13, Document Reference F.2.13) which considers the potential impact on lifeline services to and from the Isle of Man from a socio-economic perspective.
- 5.8.17.14 Through the MNEF and in responses to the PEIR, a number of stakeholders requested that the Applicant (and other Round 4 projects in the Irish Sea) include the proposed Mooir Vannin offshore wind farm within their project-alone and cumulative impact assessments. In the absence of a publicly available scoping report Mooir Vannin was included as a Tier 3 project in the PEIR. Following the statutory consultation on the PEIR, the Mooir Vannin developer, Ørsted, made project information available to the Applicant in advance of their scoping report being issued on 18 October 2023. This allowed for the inclusion of Mooir Vannin Scoping Boundary in the NRA and CRNRA workshops at the end of September 2023.

5.8.18 Marine archaeology (PEIR Volume 2, Chapter 13)

- 5.8.18.1 Feedback on matters relating to marine archaeology were received from the MMO, HE, the Isle of Man Department of Infrastructure and six members of the public. As part of the EPP and wider technical engagement activities, the AHEF – Offshore was established with representatives from the key regulatory bodies and their advisors. See Table 4.5 for a list of participants.
- 5.8.18.2 The key issues raised relevant to marine archaeology and cultural heritage, which have been identified during the statutory consultation include:
- Mitigation of a potential designated aircraft present within the Morgan Array area
 - Potential impacts to as yet unknown marine archaeology receptors within the Morgan marine archaeology study area
 - Potential for effects on historic seascape character (HSC)
 - Potential for visual change within the setting of an asset.
- 5.8.18.3 Members of the public raised general concern relating to the potential impacts on marine archaeology. The Applicant can confirm that impacts to marine archaeology receptors have been fully assessed, based on a MDS approach and no significant effects are predicted. The assessment and conclusions are documented within Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). The assessments have been updated and refined from PEIR based upon revised design parameters and input from stakeholders and consultees.
- 5.8.18.4 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.14.

Summary of Feedback and Applicant Response

Mitigation of a potential designated aircraft present within the Morgan Array Area

- 5.8.18.5 During PEIR consultation, HE highlighted the potential aircraft crash site record held by the United Kingdom Hydrographic Office (UKHO) (Ref: 5418) and National Record of the Historic Environment (Ref: 909495) within the Morgan marine archaeology study area and considered 'live' by the UKHO. Geophysical survey undertaken in 2021 did not identify any material at this location, however, due to the sensitive nature of aviation material and the potential for material to be buried in sediment, a Temporary

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Archaeological Exclusion Zone (TAEZ) of 100 m radius has been proposed at the coordinates documented by the UKHO to ensure that any material will not be impacted by the Morgan Generation Assets.

Potential impacts to identified and as yet unknown marine archaeology receptors within the Morgan marine archaeology study area

- 5.8.18.6 In their response to consultation, HE raised concerns about the potential for the Morgan Generation Assets to impact maritime archaeology receptors that were not known in the public record or able to be identified through the geophysical survey data. HE recommended that the potential for as yet unknown marine archaeology receptors of significant importance be factored into the design process. The Morgan Generation Assets has adopted measures such as the operational awareness of all identified low potential anomalies and the development of and adherence to a Protocol for Archaeological Discoveries (PAD) in order to ensure the recording and preservation of any archaeological material that may be encountered during all phases of the Morgan Generation Assets. The PAD is included as part of the Outline Offshore Written Scheme of Investigation and PAD submitted with application (Document Reference J14).

Potential for effects on historic seascape character

- 5.8.18.7 In their response to consultation, HE raised concerns about potential effects arising from the Morgan Generation Assets on HSC. Advice was sought through the Offshore AHEF and a methodology developed and refined from PEIR to application in order to assess whether the Morgan Generation Assets would alter the HSC of the area. The assessment concluded that while the development type would be new it would not pose a significant change to the character of the area, which is currently utilised by energy and other industries. Therefore, it was considered the HSC can accommodate the introduction of the Morgan Generation Assets without altering the existing characteristics of the HSC.

5.8.19 Potential for visual change within the setting of an asset

- 5.8.19.1 In their response to consultation, Manx National Heritage raised concerns about potential effects arising from the Morgan Generation Assets on the setting of protected monuments. The related assessment and conclusions are documented within Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8) and Volume 4, Annex 8.2: Cultural heritage technical report of the Environmental Statement (Document Reference F4.8.2).

5.8.20 Other sea users (PEIR Volume 2, Chapter 14)

- 5.8.20.1 Feedback was received from a number of stakeholders on matters relating to other sea users including Harbour Energy, the Isle of Man Department of Infrastructure, Ørsted, Barrow Offshore Windfarm, Walney Offshore Windfarms (Walney 1 and 2), Walney Extension Windfarm (Walney 3 and 4), West of Duddon Sands Windfarm and Manx Utilities.
- 5.8.20.2 The key issues raised relevant to other sea users, which have been identified during the statutory consultation activities undertaken for the Morgan Generation Assets to date include:

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- Ongoing consultation with, and inclusion in assessments of, pre-existing and planned infrastructure in the vicinity of the Morgan Generation Assets
- Effects on energy yield on other offshore wind farms.

5.8.20.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.15.

Summary of Feedback and Applicant Response

Ongoing consultation with, and inclusion in assessments of, pre-existing and planned infrastructure in the vicinity of the Morgan Generation Assets

5.8.20.4 In response to the PEIR, various stakeholders including Harbour Energy, the Isle of Man Department of Infrastructure and Ørsted noted that projects such as Moor Vannin, the Isle of Man interconnector cable (and planned second interconnector), the Crogga oil and gas licence, decommissioning activities associated with Millom and recreational sailing and chartered angling should all be considered within the baseline environment, impact assessments and CEAs presented within the Morgan Generation Assets DCO application as applicable. These projects are all acknowledged within Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9) and considered in assessments where relevant and consultation with these stakeholders is ongoing. It should also be noted that a number of project changes and commitments have been made that directly benefit other sea users, such as reducing the Morgan Array Area and increasing spacing between turbines, reducing effect on leisure craft operating in the local area. These project changes and commitments are detailed in Volume 1, Chapter 4: Site Selection and Alternatives of the Environmental Statement (Document Reference F1.4).

Potential for wake effects on other operational offshore wind farms

5.8.20.5 In responses to the PEIR, a number of stakeholders requested that the Applicant (and other Round 4 projects in the Irish Sea) include consideration of wind speed and direction on a number of offshore wind farms, and any potential resultant reduction in energy output. The Applicant has given appropriate consideration to potential wake effects in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

5.8.21 Seascape, landscape and visual resources (PEIR Volume 2, Chapter 15)

5.8.21.1 Feedback was received from a number of stakeholders on matters relating to the SLVIA including Natural England, Isle of Man Government, NRW, Isle of Anglesey Council and over 20 members of the public. As part of the EPP and wider technical engagement activities, consultation was established with representatives from the key regulatory bodies and their advisors.

5.8.21.2 The key issues raised of relevance to seascape and visual resources, which have been identified during the statutory consultation include:

- Potential impact of the project on the special qualities of nationally and internationally designated landscapes
- Potential cumulative effects on landscape, seascape and visual receptors
- Visual impacts from the Isle of Man.

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- 5.8.21.3 Members of the public raised general concerns on the basis of potential visual impact, although two members of the public didn't consider visual impact to be an issue.
- 5.8.21.4 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.16.

Summary of applicant response

Potential impact of the project on the special qualities of nationally and internationally designated landscapes

- 5.8.21.5 The assessment has considered the potential effects of the Morgan Generation Assets on the special qualities of the Lake District National Park and the attributes of outstanding universal value of the English Lake District World Heritage Site where these are of relevance to the SLVIA. This assessment took account of an extended 60 km SLVIA study area and is documented in Volume 4, Annex 10.5: International and nationally designated landscape study – offshore development of the Environmental Statement (Document Reference F4.10.5). A ZTV was prepared covering the 60 km distance range measured from the boundary of the Morgan Array Area to support this assessment on the national / internationally designated landscape. Viewpoints within the Lake District National Park, including at Black Combe, Whit Fell, Muncaster Fell, and Whin Rigg have been included in the SLVIA along with photomontages.

Potential cumulative effects on landscape, seascape and visual receptors

- 5.8.21.6 The methodology used for the assessment of cumulative effects on seascape/landscape and visual receptors was considered to be broadly acceptable. Consideration of Moir Vannin Offshore Wind Farm and cumulative effects on landscape, seascape and visual receptors including national trails within designated landscapes were raised as areas of concern. The cumulative SLVIA has been updated taking into account available scoping data on the proposed Moir Vannin offshore wind farm and the recently consented Awel y Môr offshore wind farm and recently submitted Mona Offshore Wind Project along with existing offshore wind farms. Cumulative effects on landscape, seascape and visual receptors including national trails and the national / internationally designated Lake District National Park are now addressed in more detail in in Volume 2, Chapter 10: Seascape, landscape and visual resources of the Environmental Statement (Document Reference F2.10).

Visual impacts from the Isle of Man

- 5.8.21.7 A number of responses raised concerns over the visual impacts of the turbines from the Isle of Man.
- 5.8.21.8 The design changes to the array (since PEIR), in terms of the contraction of the array area and increased separation from the northwest coast of England (now 37.13 km), and Isle of Man (now 22.22 km) whilst not driven by the SLVIA, are a mitigating factor in terms of adverse landscape, seascape and visual effects and responds to concerns raised by some members of the public.

5.8.22 Aviation and radar (PEIR Volume 2, Chapter 16)

- 5.8.22.1 Feedback was received from a number of stakeholders on matters relating to aviation and radar including Stena Line, Liverpool Airport, Isle of Man Ronaldsway Airport, Barrow Walney Airfield and Warton Airfield, and Blackpool Airport.
- 5.8.22.2 The key issues raised relevant to aviation and radar, which have been identified during the statutory consultation activities include:
- Creation of physical obstacles to aircraft operations (e.g. helicopter access)
 - Wind turbines causing interference with aviation Primary Surveillance Radar (PSR) systems
 - Aviation lighting causing confusion to the maritime community.
- 5.8.22.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.17.

Summary of Feedback and Applicant Response

Creation of physical obstacles to aircraft operations

- 5.8.22.4 Blackpool Airport noted, as in the PEIR, that the development of the offshore windfarm will have an impact on the Minimum Safety Altitude (MSA) currently used by Blackpool Airport. It is also likely that the development will have an impact on current and planned Instrument Flight Procedures (IFPs) to Blackpool Airport. The airport seeks reassurance that the development of the offshore project will not impact the MSAs and/or current or planned IFPs. Analysis conclusions indicate that there will be no impact to currently published Blackpool Airport IFP/MSA. The Isle of Man (Ronaldsway) Airport stressed the importance of appropriate mitigation measures being put in place to ensure that identification of potential impacts on aviation safety and the safety of aircraft operating in the vicinity of offshore wind farms are addressed.
- 5.8.22.5 Liverpool Airport accepts that the Liverpool Airport IFP safeguarded areas will not be impacted by the Morgan Generation Assets. Liverpool Airport has no objection to the Morgan Generation Assets. Consultation with key stakeholders, including Liverpool, Blackpool and Isle of Man (Ronaldsway) Airports, has continued to ensure that mitigation measures are in place where necessary.
- 5.8.22.6 Harbour Energy noted concern that Wind turbine and OSP construction infrastructure above LAT could restrict access to helicopters operating in support of their operations. Appendix A of Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement addresses helicopter access to applicable oil and gas infrastructure in the Irish sea and the impact of the Morgan Generation Assets to airport operations through the creation of physical obstacles is assessed fully in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).
- 5.8.22.7 A full assessment of IFPs is presented in Appendix B of Volume 4, Annex 11: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1), and the impact of the Morgan Generation Assets to airport operations through the creation of physical obstacles is assessed fully in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

Wind turbines causing interference with aviation Primary Surveillance Radar systems

5.8.22.8 No NATS response to the PEIR was received; the Applicant's assessment indicated that the Morgan Generation Asset's wind turbines would have a detrimental effect on NATS' regional radar systems, and that mitigation would be required before the erection of any wind turbines. Liverpool Airport accepted the radar Line of Sight (LoS) analysis results presented at PEIR (using a blade tip height of 324 m above LAT). Following PEIR the blade tip height was revised to 364 m above LAT. Updated LoS modelling predicted that the Liverpool Airport PSR would still not theoretically detect the operational wind turbines of the Morgan Generation Assets. This was also confirmed as acceptable to Liverpool Airport. Consultation with similarly effected stakeholders, including NATS, has continued throughout the pre-application phase and is ongoing regarding implementation of appropriate mitigation to minimise risks/reduce adverse impacts to an acceptable level. Mitigation will be in place prior to the erection of the wind turbine towers of the Morgan Generation Assets.

5.8.22.9 A full assessment of the Morgan Generation Asset's wind turbines interference with aviation PSR systems is presented in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

Aviation lighting causing confusion to the maritime community

5.8.22.10 In response to the PEIR, Stena Line raised concerns that aviation lighting fitted to offshore wind turbines has the potential to impact upon the maritime community as the specification for the lighting to be displayed below the horizontal plane of the light filament itself could cause mariners some confusion. An Aids to Navigation Management Plan will be agreed with all relevant stakeholders, and on the basis of stakeholder feedback, night simulations were included within the 2023 navigation simulation sessions conducted with ferry companies and reported within Volume 4, Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F4.7.1) and Volume 2, Chapter 7: Shipping and navigation chapter of the Environmental Statement (Document Reference F2.7).

5.8.23 Climate change (PEIR Volume 2, Chapter 17)

5.8.23.1 Feedback was received from a number of stakeholders on matters relating to climate change including the Isle of Man Government, Isle of Man Steam Packet Company, Stena Line and ten members of the public. As part of the EPP and wider technical engagement activities, consultation was established with representatives from the key regulatory bodies and their advisors.

5.8.23.2 The key issues raised of relevance to climate change, which have been identified during the statutory consultation activities undertaken for the Morgan Generation Assets include:

- Overall beneficial effect in respect of climate change
- Assessment of cumulative or individual impact of the Mona, Morecambe and Morgan Offshore Wind Farms on direct/indirect greenhouse gas (GHG) emissions
- The increased time and fuel consumption for Stena Line (and other ferry operators) to perform their routes (in normal and adverse weather conditions) as a result of the footprint of the wind farms.

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5.8.23.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D24.18.

Summary of Feedback and Applicant Response

Assessment of cumulative or individual impacts

5.8.23.4 GHG emissions are not bound by geographical boundaries. Consequently, cumulative effects due to other specific local development projects are not individually considered but are taken into account when considering the impact of the Morgan Generation Assets by defining the atmospheric mass of GHGs as a high sensitivity receptor. This is in accordance with IEMA guidance on Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022).

Third party route deviation

5.8.23.5 Consideration has been given to the indirect impact of route deviation within the Volume 4, Annex 12.1 Technical greenhouse gas assessment of the Environmental Statement (Document Reference F4.12.1) and has been considered in the operations and maintenance assessment. This draws on information presented within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F.2.7) and the NRA (Document Reference F4.71).

5.8.24 Socio-economics (PEIR Volume 2, Chapter 18)

5.8.24.1 Feedback was received from a number of stakeholders on matters relating to socio-economics including the Isle of Man Government and members of the public. As part of wider technical engagement activities, consultation was established with representatives from the key regulatory bodies and their advisors.

5.8.24.2 The key issues raised of relevance to socio-economics, which have been identified during the statutory consultation include:

- Recommendation that a skills and employment strategy be prepared to identify opportunities for employment and training
- Maximise local socio-economic benefits and collaborate with other major projects within the region
- Social and economic risks associated with potential lifeline ferry disruption.

5.8.24.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.19.

Summary of Feedback and Applicant Response

Skills and employment strategy

5.8.24.4 The Applicant has committed to the provision of a Skills and Employment Plan which is included as a requirement of the dDCO. An Outline of this plan has been submitted with the application (Document Reference J8).

5.8.24.5 The actions presented within the Outline Plan will form the basis of a post-consent Skills and Employment Strategy, which will be adopted by the Applicant to help develop and support the economic benefits associated with the Morgan Generation Assets in relation to skills and employment within the offshore wind sector.

Maximise local socio-economic benefits and collaboration with other major projects in the region

5.8.24.6 As set out above, an Outline Skills and Employment Plan (Document Reference J8) and post-consent Skills and Employment Strategy include project commitments which will involve collaboration with other wind farm projects.

Social and economic risks associated with potential lifeline ferry disruption

5.8.24.7 Potential socio-economic impacts on the Isle of Man associated with potential adverse effects on lifeline ferry services is considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13).

5.8.25 Human health assessment (PEIR Volume 2, Chapter 19)

5.8.25.1 Feedback was received from several stakeholders on matters relating to human health including Stena Line, the MMO, the Isle of Man Government and other interested parties.

5.8.25.2 The key issue raised relevant to Human Health, which has been identified during the statutory consultation was:

- Health inequalities as a result of ongoing and more frequent disruption to goods and services.

5.8.25.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D.24.20.

Summary of Feedback and Applicant Response

Health inequalities as a result of ongoing and increased disruption

5.8.25.4 Stena Line notes that the cumulative impact of the Morgan, Morecambe and Mona Offshore Wind Farms on human health as a result of navigational risk or otherwise were not assessed in the PEIR. Volume 2, Chapter 14: Human Health chapter of the Environmental Statement (Document Reference F2.14) has had regard for cumulative effects, including of the Morgan, Morecambe and Mona Offshore Wind Farms. A cumulative assessment of the public health implications which takes into consideration the cumulative effects discussed in the other technical chapters of the Environmental Statement.

5.8.25.5 Responses also expressed concerns about the potential impact of the Morgan Generation Assets on the ferry routes connecting the Isle of Man with the rest of Great Britain, particularly the impact on medical deliveries. Concerns included longer travel times and reduced accessibility particularly during bad weather and associated knock-on impacts in terms of security of supply and disruption to health services.

5.8.25.6 Correspondence with the Director of Corporate Services and Healthcare Services on the Isle of Man has confirmed the timings of medical and other health related deliveries to the IoM. The assessment has taken this into account, and it is not expected that such deliveries would be subject to disruption on a scale that could significantly affect population health.

5.8.26 Inter-related effects (PEIR Volume 2, Chapter 20)

5.8.26.1 As the inter-related effects chapter considers effects from multiple receptors groups rather than being a standalone topic, feedback on the inter-related effects has been reported under the relevant topics and tables within Appendix D.24.

5.8.27 Draft Habitats Regulations Assessment

5.8.27.1 Feedback was received from a number of stakeholders on matters relating to HRA and the draft HRA which was available during statutory consultation. Consultees included in particular the MMO, Natural England, NRW, NWWT and the Isle of Man Government. As part of the EPP and wider technical engagement activities, EWGs were established with representatives from the key regulatory bodies and their advisors to discuss HRA.

5.8.27.2 The key issues raised relevant to the HRA, which have been identified during the statutory consultation activities undertaken for the Project to date include:

- Approach to Likely Significant Effects (LSE) screening for SPAs
- Baseline characterisation
- Potential impacts of underwater sound on marine mammal Annex II species

5.8.27.3 All feedback received against this topic, alongside the Applicant's response can be seen in Appendix D24.21.

Summary of Feedback and Applicant Response

Approach to LSE Screening for SPAs

5.8.27.4 In response to the PEIR, Natural England did not agree with the approach to LSE screening for offshore ornithology in the PEIR. Natural England highlight that LSE is a coarse screening filter and that the use of any further screening criteria should be part of the appropriate assessment. Using LSE as a coarse filter provides a transparent approach that can be followed through the HRA Stage 2 ISAA. Where a qualifying feature has been recorded on the Morgan Generation Assets site, with potential connectivity (e.g. within foraging range) and a potential impact pathway, there is the potential to undermine the conservation objectives of the feature. Under such circumstances NRW outlined that they expect all sites to be carried through to the appropriate assessment phase, and do not agree with the SPAs and features screened out of LSE.

5.8.27.5 Since PEIR, the LSE screening approach was refined and agreed with the EWG. The updated methodology presented included the process for identifying European sites and species where there is the potential for a LSE. The process and associated buffers used to screen in sites was presented for Annex I habitats (offshore and coastal), Annex II diadromous fish, Annex II marine mammals, Annex I habitats (onshore), Annex II species (onshore) and ornithology (onshore and offshore). The HRA Stage 1 Screening Report and HRA Stage 2 ISAA Reports have been updated based on feedback received.

Baseline characterisation

5.8.27.6 Natural England raised concern that for several receptors, the PEIR was based on incomplete data (offshore ornithology, marine mammals) or refers to additional data

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collection that is not presented or still to be carried out (physical processes, benthic ecology). Natural England highlighted that they cannot therefore make any conclusive judgements based on the PEIR, including the cumulative/in-combination assessments and the HRA. Accordingly, their advice focused on the methodology used. Natural England emphasised the need to base the submitted Environmental Statement on robust datasets that meet (and where appropriate exceed) minimum standards, for example marine mammal and offshore ornithology impact assessments should be based on at least 24 months of surveys.

- 5.8.27.7 Site-specific marine mammal surveys were completed in March 2023 for the Morgan Generation Assets, and associated data is presented in Volume 2, Annex 4.1: Marine Mammal Technical Report of the Environmental Statement (Document Reference F2.4.1). Associated data informs the assessment presented in Volume 2, Chapter 4: Marine Mammals of the Environmental Statement (Document Reference F2.4).
- 5.8.27.8 The Applicant can confirm that data from 24 months of digital aerial surveys have been incorporated throughout Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference F4.5.1) Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) and the HRA Stage 2 ISAA (Document Reference E1.1 to E1.3).

Potential impacts of underwater sound on marine mammal Annex II species

- 5.8.27.9 Consultation responses from NRW and Natural England raised concerns regarding the potential impacts of underwater sound from piling and UXO clearance activities on marine mammals, in particular harbour porpoise. There were concerns that only the EDR approach was used for the assessment of disturbance associated with piling to assess impacts on harbour porpoise in the North Anglesey Marine SAC. Based on the modelled contours provided on the PEIR, NRW noted that absence of an adverse effect on the North Anglesey Marine SAC for the MDS of two simultaneous monopile drives could not be ruled out. NRW recommended that when assessing the area disturbed for harbour porpoise, an unweighted noise threshold of 143 dB re 1 μ Pa (or 103 dB re 1 μ Pa VHF-weighted) single strike sound exposure level (Brandt et al.,2018; Heinis et al.,2019) should be used, in parallel to EDRs, to represent the minimum fixed noise threshold at which significant disturbance would occur from impulsive noise sources.
- 5.8.27.10 NRW disagreed with the assumption that the extent of behavioural disturbance from piling was likely to be an overestimate due to noise losing its impulsive characteristics with range. This argument is valid when estimating impact ranges for PTS/TTS, though not when assessing behavioural disturbance based on dose response curves as these are obtained from field observations where animals may react to the noise they receive at their location.
- 5.8.27.11 Since the submission of the PEIR, the project parameters have been refined to remove monopile foundations, and the assessment approach of disturbance resulting from piling sound has been reviewed and updated. An unweighted sound threshold of 143 dB re 1 μ Pa (or 103 dB re 1 μ Pa VHF-weighted) which is based on a collation of field studies of harbour porpoise response to elevated subsea noise from piling, has been presented in the Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). This represents a fixed sound threshold at which significant disturbance could occur, any behavioural effects beyond this point

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are likely to be mild. This has been carried forward to the HRA and presented alongside the effective deterrence range as an area-based threshold for the purposes of understanding potential overlap with SAC habitat.

5.8.28 Draft Development Consent Order (including deemed marine licences)

5.8.28.1 The Applicant prepared a dDCO for the statutory consultation. This included a draft deemed Marine Licence (dML) for the Morgan Generation Assets.

5.8.28.2 Feedback was received from several stakeholders on the dDCO and dML, including from the MMO, THLS, the MCA, and the Isle of Man Government. The key issues raised in relation to the dDCO were in connection with the dML, including:

- Comments on conditions concerning notifications, surveys and monitoring
- Comments on which entities should be consulted, receive notifications and the timings for that process

5.8.28.3 All feedback received against this topic, alongside the Applicant's response, can be seen in Appendix D.24.22. The responses to the points raised by the MMO, THLS, the MCA, and the Isle of Man Government note where updates have been made to the drafting of conditions to address concerns raised.

5.8.28.4 The Applicant had regard to all comments received during the statutory consultation on the dDCO. Where the Applicant agrees with the drafting proposed by consultees it has included this within the application dDCO (Document Reference C1). The Applicant expects there will be further discussion in relation to the dDCO including the dML during the examination of the Application, including issue specific hearing sessions where consultees will have the opportunity to make representations on the application dDCO and dML.

6 POST STATUTORY CONSULTATION ENGAGEMENT

6.1 Summary of post-statutory consultation engagement

6.1.1 Introduction

6.1.1.1 Following the statutory consultation period, which ended on 04 June 2023, the Applicant continued to engage with technical and community stakeholders.

6.1.1.2 Engagement took the form of reactive engagement through responding to queries received to the project mailbox and telephone line and proactive announcements to inform stakeholders of surveys or design refinements.

6.1.1.3 This post-statutory engagement formed an integral part of the Applicant's approach to making appropriate and necessary amendments to the project design (including relevant mitigation measures) as the application was finalised.

6.1.2 Technical Engagement

6.1.2.1 Following the close of statutory consultation, the Applicant continued to engage with the EPP Steering Group, EWGs, Engagement Forums and technical consultees. A series of meetings and workshops were held to discuss the statutory consultation responses and the results of ongoing assessment work.

6.1.2.2 This is discussed in more detail within the consultation section of the individual chapters of the Environmental Statement (Document Reference F1 - F4), as well as in the TEP (Document Reference E4).

6.1.3 Other engagement with the local community

6.1.3.1 The Applicant conducted both proactive and reactive engagement with the local community after the statutory consultation period officially ended on 04 June 2023. This involved:

- Ongoing handling of enquiries received to the project mailboxes and telephone line
- Update newsletter on design refinements to the offshore aspect of the scheme (published/issued in September 2023)
- Website updates.

6.1.4 Announcement of offshore design refinements

6.1.4.1 In September 2023, the Applicant announced that, based on feedback received during the statutory and non-statutory phases of consultation, the Morgan Array Area would be reduced.

6.1.4.2 A four-page Project Update newsletter was created detailing this and other project refinements. This is included as Appendix E.1.

6.1.4.3 The offshore refinements post-consultation newsletter explained that the Applicant had been working closely with stakeholders to understand the potential impacts of the proposed offshore wind farm and how these could be mitigated.

6.1.4.4 In particular, it explained that the Applicant acknowledged that potential effects on ferry routes from the Morgan Generation Assets was a concern for stakeholders – both as

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an individual project and when considered alongside other developments in the Irish Sea – and that feedback received through the statutory consultation on the PEIR, alongside further engineering, environmental and technical work, had informed the decision to reduce the Morgan Array Area from what was presented in the PEIR (Morgan Offshore Wind Ltd, 2023).

- 6.1.4.5 The Applicant's position was that this would reduce the impact of the Morgan Generation Assets on ferry operators and other marine users, as well as reducing cumulative effects when considered alongside neighbouring developments.
- 6.1.4.6 The newsletter highlighted:
- The Applicant would reduce the Morgan Array Area from what was presented in its PEIR. This was a reduction in area from approximately 322 km², to approximately 280 km²
 - To promote co-existence with fishing activities, particularly scallop, the Applicant would be committing to maintaining an area free of wind turbines and OSPs within the Morgan Array Area
 - The Applicant had increased the spacing from approximately 1000 m between rows of wind turbines and approximately 875 m between each wind turbine in a row, to a proposed minimum spacing of approximately 1400 m, both within and between rows of turbine and OSP infrastructure
 - The Applicant has committed to maintaining two 'lines of orientation' through the Morgan Array Area, and that the wind turbine rows would be generally orientated north to south to further aid in the safety of marine navigation, fishing activities and search and rescue within the array area
 - That the maximum number of wind turbines had been reduced from 107 to 96 and that the rotor diameter of the largest wind turbine had been increased from 280 m to 320 m
 - That due to ground conditions, the Applicant had removed the option of using monopile foundations, but the potential for using gravity base and/or jacket foundations remained.
- 6.1.4.7 The newsletter stated the Applicant's commitment to continue to undertake assessments and engage with stakeholders ahead of developing the Environmental Statement prior to the submission of the DCO application in 2024.
- 6.1.4.8 The newsletter also highlighted the forthcoming Morgan and Morecambe Offshore Wind Farms: Transmission Assets statutory consultation, which was planned to start soon afterwards and ran from 12 October to 23 November 2023. As part of this update, the newsletter noted what this consultation would focus on and listed the potential ways to get in contact with the Morgan and Morecambe Offshore Wind Farms: Transmission Assets project.
- 6.1.4.9 The newsletter was not distributed to properties onshore, as the offshore-focused content of the announcement was deemed to largely be of interest to technical and prescribed consultees focused on offshore activities. As such, the announcement was made by email to members of the project's MNEF on 18 September 2023 and to relevant section 42 stakeholders on 19 September 2023. Where email addresses were deemed unreachable, the update was sent via post to 26 addresses, with the newsletter and a covering letter enclosed.
- 6.1.4.10 The consultation website was updated with a large 'View update here' button linking to an online version of the newsletter ahead of the emails being sent to consultees.

7 ONGOING ENGAGEMENT ACTIVITIES AND STATEMENTS OF COMMON GROUND

7.1 Introduction

7.1.1.1 The Applicant remains committed to ongoing engagement beyond statutory consultation. It intends to maintain an open, transparent dialogue with statutory consultees, the local community and landowners throughout the next phases of the project.

7.2 Ongoing engagement with statutory consultees

7.2.1.1 Morgan Generation Assets has been subject to statutory and non-statutory stakeholder consultation, including with regulators, TCE as landowner the local community and other interest groups. Consultation activity significantly influenced its evolution in readiness for the submission of the application for a DCO.

7.2.1.2 Where possible and necessary, feedback has been referenced up to as close to the submission of the DCO application as possible, even where this was outside the response period given. Regard has been given by the Applicant to these responses and, where appropriate and proportionate, has influenced the proposed project design. If amendments have not been possible in light of responses, justification has been provided within this Consultation report as to why this has been the case.

7.2.1.3 Ongoing engagement will take place with those involved in the EPP, Engagement Forums, EWGs and other topic specific technical consultees, as reported within the TEP (Document Reference E4).

7.3 Ongoing engagement with the local community

7.3.1.1 The Applicant is committed to ongoing engagement with stakeholders, both in the period leading up to the submission of the DCO application and during the pre-examination, examination, determination and post-determination phases. This is to ensure that stakeholders (specifically those with offshore/shipping/fisheries interests) are aware of the progress of the application and how they can take part during the examination.

7.3.1.2 In addition, the Applicant will also undertake engagement activities to share any important project updates or information on decisions the Applicant makes. This may include the notification of any work that might be happening in the offshore area.

7.3.1.3 This communications activity may include letters issued by email or post, community update newsletters, meetings with specific groups or stakeholders and the ongoing publication of updates on the consultation website, as deemed appropriate and based on the information and milestones to be shared.

7.3.1.4 In the event that the project is granted development consent, a full engagement strategy will be created to include details of how the Applicant will disseminate information such as details of construction schedules, potential plans to manage disruption and contact information for addressing issues or enquiries. This is likely to include regular briefings, newsletters, and stakeholder forums to keep stakeholders informed of progress and address any concerns or unexpected challenges.

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7.4 Statements of Common Ground (SoCG)

- 7.4.1.1 Following submission, the Applicant will seek SoCGs with key consultees to assist the Planning Inspectorate and the Secretary of State to aid understanding and clarification over which issues regarding the Morgan Generation Assets are resolved and agreed, or otherwise.
- 7.4.1.2 The SoCGs will aim to set out a record of consultation undertaken to date with each relevant stakeholder and the key areas of agreement and any outstanding issues.

8 CONCLUSION

8.1 Summary

- 8.1.1.1 In this report, the Applicant has set out how it has demonstrated its commitment to a robust consultation dedicated to the principles of openness, transparency, constructiveness, and collaboration.
- 8.1.1.2 Consulting with people and organisations which may be affected by the development is an integral part of the DCO planning process. This report explains that all consultation activity has been conducted accordingly, with an emphasis not merely on legal compliance but on a comprehensive engagement effort. This spans the project's earliest, pre-scoping phase in July 2021, to the published periods of non-statutory consultation in 2022 and statutory consultation in 2023. It also covers the ongoing community and stakeholder engagement activity that has continued beyond consultation and into the second quarter of 2024.
- 8.1.1.3 The report has set out how the Applicant has fulfilled its statutory obligations under sections 42, 47 and 48 of the 2008 Act regarding who should be consulted, how they should be consulted and how the consultation should be publicised. The report itself aligns with the recommended structure and content for a comprehensive Consultation report and provides a detailed account of all pre-application stage consultation and stakeholder engagement activities related to the Morgan Generation Assets, in accordance with the Planning Inspectorate's guidelines and the DCLG Guidance.
- 8.1.1.4 The Applicant has striven for the highest standards regarding compliance. To demonstrate that the Applicant has met the requirements of both legislation and guidance regarding pre-application consultation, a Consultation Compliance Checklist is provided within Appendix B.1.
- 8.1.1.5 As the Morgan Generation Assets DCO application boundary is located wholly within the marine environment, with no onshore infrastructure, there is no requirement to prepare a SoCC under section 47 of the 2008 Act. However, consulting with stakeholders who may be affected by Morgan Generation Assets is an important part of the DCO planning process and an integral part of developing the proposals. The project therefore undertook consultation in alignment with relevant legislation as identified in section 5.2.1. As set out in Advice Note Fourteen, the Consultation report has provided evidence of how the Applicant has complied with the published SoCC.
- 8.1.1.6 Throughout all stages of consultation, the Applicant's main aim has been to allow interested parties the opportunity to provide their feedback on the proposals. The Applicant is grateful to all individuals and organisations who took part in the consultation and submitted their views. All these views have been considered as the proposals have been refined ahead of submitting the DCO application.
- 8.1.1.7 All feedback has been published, along with the Applicant's regard to the feedback, as part of this Consultation report, and a summary has been given of where feedback has influenced the project design (as prescribed by section 49 of the 2008 Act).
- 8.1.1.8 As stated in section seven, following submission, the Applicant will seek SoCGs with key consultees to assist the Planning Inspectorate and the Secretary of State. These will aid understanding and clarification over which issues regarding the Morgan Generation Assets are resolved and agreed between relevant stakeholders, or otherwise. SoCGs can help streamline the planning process by identifying points of consensus and reducing the need for prolonged negotiations or disputes and facilitate smoother decision-making.

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