

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

The Applicant's response to Local Impact Report from TSC IoM Government at Deadline 2

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
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 Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.

Acronyms

Acronym	Description
CFLO	Company Fisheries Liaison Officer
CIEEM	Chartered Institute of Ecology and Environmental Management
DCO	Development Consent Order
DEFA	Department of Food, Environment and Agriculture
DfE	Department of Enterprise
dMLs	Deemed Marine Licence
DOI	Department of Infrastructure
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ES	Environmental Statement
FIR	Fishing Industry Representative
IMO	International Maritime Organization
INNS	Invasive non-native species
IoMSPC	Isle of Man Steam Packet Company
LAT	Lowest Astronomical Tide
LIR	local impact report
MCC	Manx Cable Company
MFPO	Manx Fish Producers Organisation
MLAT	MultiLATeration
MMMP	Outline marine mammal mitigation protocol
MMO	Marine Management Organisation

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Acronym	Description
MNR	Marine Nature Reserve
MPCP	Marine Pollution Contingency Plan
OFLCP	Outline Fisheries Liaison and Coexistence Plan
OFLO	Offshore Fisheries Liaison Officers
SLVIA	Seascape, landscape and visual resources
SOLAS	Safety of Life at Sea
SMZ	Scallop Mitigation Zone
SMAA	Surveillance Minimum Altitude Area
TSC	Territorial Sea Committee
UWSMS	Underwater Sound Management Strategy
VMS	Vessel Monitoring System

Units

Unit	Description
%	Percentage
m	Metre
km	Kilometre
km ²	Kilometre squared
mi	Mile

1 THE APPLICANT'S RESPONSE TO THE LOCAL IMPACT REPORT FROM TSC IOM GOVERNMENT AT DEADLINE 2

1.1 Introduction

- 1.1.1.1 This document has been prepared in response to the Local Impact Report from Territorial Sea Committee (TSC) Isle of Man (IoM) Government (REP1-047) submitted to the Examining Authority at Deadline 1. TSC IoM Government's comments and the Applicant's response are presented in section 1.2.

1.2 Response

Table 1.1: The Applicant's response to IoM TSC local impact report.

Reference	Local Impact Report Comment	Applicant's response
REP1-047.1	<p>1 Terms of Reference 1.1 Introduction</p> <p>This report comprises the local impact report (LIR) of the Territorial Sea Committee (TSC) of the Isle of Man Government. The TSC has had regard to the purpose of LIRs as set out in s60(3) of the Planning Act 2008 (as amended) and the Planning Inspectorate's Advice Note One, Local Impact Reports, in preparing this LIR. The Territorial Sea Committee is a cross-governmental committee which was set up to manage the Isle of Man's interests following the purchase of the Territorial Sea (including hydrocarbon, coal and mineral rights) by the Isle of Man Government from the United Kingdom Government in 1991. Although the Isle of Man Government is not a local authority as defined in Section 56 of the Planning Act 2008 and many of the aspects usually covered by local authorities are not relevant here, the TSC is grateful for this opportunity to provide an LIR due to the project being immediately adjacent to Manx Territorial Seas.</p>	<p>The Applicant welcomes the engagement from IoM TSC and notes the response.</p>
REP1-047.2	<p>1.2 Scope</p> <p>The LIR only relates to potential impacts of the proposed development that may, directly or indirectly, affect the Isle of Man. It should be noted that whilst there is overlap between the interest of the TSC and additional external Isle of Man stakeholders, the LIR only represents the position of the TSC and cannot represent the views of external stakeholders such as the Isle of Man Steam Packet Company (IoMSPC) or the Manx Fish Producers Organisation (MFPO). It is hoped that the project team will continue to liaise with key stakeholders such as these throughout the progression of the project. Only a brief description of the development area is provided (Section 1.4) to highlight the location in relation to the Isle of Man. The applicant's ES otherwise provides a sufficient description. The LIR does not describe the proposed development any further, relying on the applicant's description as set out in Volume 1, Chapter 3 of the Environmental Statement (ES) (document APP-010). As the proposed development area is entirely outside Isle of Man Government jurisdiction there is no relevant planning history relating to the site.</p>	<p>The Applicant notes the response.</p>

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Reference	Local Impact Report Comment	Applicant's response
REP1-047.3	<p>1.3 Purpose and Structure of the LIR</p> <p>The LIR's primary purpose is to identify the likely impacts of the proposed development to the Isle of Man. As the LIR seeks to address all likely impacts there is obviously some overlap and repetition of previous submissions / consultation responses. It will also be the case that topics covered in the LIR will be duplicated in the Statement of Common Ground when this is prepared and agreed for submission by all parties. The LIR has been structured using the subject chapter headings of the applicants ES for ease of reference. Where specific concerns relate to multiple subjects this has been noted.</p>	<p>The Applicant welcomes the approach taken by TSC.</p>
REP1-047.4	<p>1.4 Description of the Area</p> <p>The proposed Morgan Array Area is an area of approximately 280 km² located to the southeast of the Isle of Man. The area is immediately adjacent to the Isle of Man Territorial Seas limit and extends approximately 11.1km (6 nautical miles) along this territorial boundary. The site is therefore approximately 22.2km (12 nautical) miles from the coast of the Isle of Man between Santon Head and Douglas Bay. The site is located 16.7km from the Langness Marine Nature Reserve (MNR) and within 50km of all 10 IoM MNRs. The site is also located approximately 4.85km at the nearest point southwest of the proposed Moir Vannin Offshore Wind Farm which is located entirely within the Isle of Man Territorial Sea.</p>	<p>The Applicant notes the response.</p>
REP1-047.5	<p>2 Assessment of Impacts</p> <p>2.1 Benthic subtidal ecology</p> <p>The TSC has previously noted concerns regarding the potential introduction of invasive non-native species (INNS), with particular concern regarding <i>Didemnum vexillum</i> (carpet sea squirt) and <i>Crepidula fornicata</i> (slipper limpet). Whilst it is noted that the significance of effect is assessed as minor adverse this is dependent on following the Environmental Management Plan (EMP) and INNS Management Plan both of which are only due to be produced post consent. Given the proximity of the development to the Manx Territorial Sea it is considered essential that the Isle of Man is consulted and fully integrated in these plans. It is also noted that there is no proposed specific monitoring for INNS.</p>	<p>The Applicant notes the response from TSC and has updated the Offshore in-principle monitoring plan (previous reference APP-066) and the Mitigation and monitoring schedule (previous reference APP-076) at Deadline 2 to include the monitoring of INNS as described in section 2.9.12 of the Benthic subtidal ecology chapter (APP-020). The Applicant has received confirmation from Marine Management Organisation (MMO) that the Isle of Man Government will be consulted on the pre-construction plans, where necessary. The Applicant will continue to engage with the Isle of Man TSC and the MMO on this matter.</p>
REP1-047.6	<p>2.2 Fish and shellfish ecology and Commercial fisheries</p> <p>Fish and shellfish ecology and commercial fisheries have been combined here as the impacts are highly interrelated and therefore comments are valid for both subjects.</p>	<p>The Applicant notes the TSC response and will continue to engage with the Isle of Man TSC and the MMO on this matter. Please refer to RR-020.57 and RR-020.59 in S_PD_3 Applicant's Response to Relevant Representations (PD1-017).</p>

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	<p>Commercial fisheries are an important part of the Island's economy and are largely dependent on good, local stocks of molluscs and crustaceans including: king and queen scallops, whelk, brown crab, lobster and, to a lesser extent, langoustine. In addition, sea fishery resources are an important part of the Island's natural environment and one of the largest living components of its Biosphere. To assist the conservation and management of these resources the Isle of Man has designated 10 MNRs covering 10.8% of the territorial sea. Of particular concern to the TSC are any impacts on spawning/nursery areas and any restriction and/or displacement of commercial fishing activity.</p> <p>Throughout the ES the impacts on Fish and shellfish ecology and commercial fisheries have been assessed as negligible to minor adverse both for the project alone and cumulatively with other projects. The outline fisheries liaison and co-existence plan and the introduction of the Scallop Mitigation Zone are welcome and provide some mitigation against potential effects. However, it is noted that there seems to be no proposed monitoring of the effects of the project on marine ecology or commercial fisheries which is concerning.</p> <p>Given that the site is immediately adjacent to Manx Territorial Sea it is considered essential that the Isle of Man and its interests are considered and fully integrated into the EMP and Marine Pollution Contingency Plan (MPCP). In the draft DCO as submitted as part of the application, there are currently no requirements on the developer for contacting IoM authorities /organisations in regard to pollution incidents, mitigation failure etc that may impact Manx waters.</p>	<p>The Applicant has engaged with the TSC in the development of a Statement of Common Ground. The SoCG with TSC was submitted at Deadline 1 (REP1-034)). In addition, the Applicant has updated the Outline Fisheries Liaison and Coexistence Plan (OFLCP) at Deadline 2 (S_D2_12 Outline Fisheries Liaison Co-existence Plan F02). This update includes a new commitment to monitor queen scallop densities and this has also been captured in the updated Offshore in-principle monitoring plan submitted at deadline 2 (S_D2_9 In Principle Monitoring Plan F02).</p> <p>The approach to monitoring will be fully developed post-consent and secured in the final offshore monitoring plan. Scallop monitoring is likely to take the form of pre- and post-construction dredge surveys for up to five years post-construction. Further monitoring for fish and shellfish ecology receptors is not proposed due to the absence of any predicted residual significant effects, in line with CIEEM (2022) guidance.</p> <p>Additionally, as set out in section 1.3.6 of the OFLCP (APP-065), the Applicant committed to annual reviews of Vessel Monitoring Systems (VMS) data for the first five years of the operations and maintenance phase. This review will seek to identify whether there are any changes to fishing activity and/or landings of key species within and around the Morgan Array Area and where there is change, to discuss with commercial fisheries stakeholders. The purpose of this commitment is to contribute to the evidence base for commercial fishing activity and to validate the conclusions of the assessment within Volume 2, Chapter 6 Commercial fisheries (APP-024). The Applicant has updated the OFLCP at Deadline 2 to also include I-VMS when available, following feedback from commercial fisheries stakeholders.</p> <p>Fish and shellfish ecology Important Ecological Features have been defined through detailed baseline characterisation, including characterisation of the presence and location of spawning and nursery grounds (where data allows), and consideration of commercial fisheries landings statistics alongside other published literature and data within Volume 4, Annex 3.1: Fish and shellfish ecology technical report (APP-051). Impacts to spawning and nursery receptors are fully assessed within Volume 2, Chapter 3: Fish and shellfish ecology (APP-021).</p> <p>The Applicant notes that impacts to spawning herring at Douglas Bank from underwater sound due to piling are predicted (if unmitigated) to have a potentially significant effect for both the project alone, and cumulatively with other projects and plans, and a potentially significant effect to cod from the same impact is predicted for the Morgan Generation Assets cumulatively with</p>

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		<p>other projects and plans. As a consequence, the Applicant committed to managing these impacts to non-significant levels through development of an Underwater Sound Management Strategy (UWSMS), an outline of which is provided within the application (APP-068). The UWSMS is secured as a condition of the deemed marine licence(s) within the draft Development Consent Order (REP1-021).</p> <p>The Applicant notes TSC's comments on integration within the EMP and MPCP and contacts for reporting pollution incidents and will consult TSC in the development of the EMP and MPCP to ensure the IoM Government contact details are included for any notifications, where relevant. The Applicant has received confirmation from MMO that the Isle of Man Government will be consulted on the pre-construction plans, where necessary. The Applicant is continuing to engage with MMO on this matter.</p>
<p>REP1-047.7</p>	<p>2.3 Marine mammals For the Isle of Man, the Wildlife Act 1990 is the primary wildlife protection legislation and sets out schedules of species that are legally protected from injury or disturbance, this includes all pinnipeds and cetaceans.</p> <p>The TSC agrees with the proposed mitigation detailed in the outline marine mammal mitigation protocol (MMMP) and the subsequent assessment of effects on marine mammals that are stated in the ES. Given the location of the site any disturbance of marine mammals during construction / operation will affect marine mammals in Isle of Man Territorial Waters. It is therefore requested that the marine mammal reporting outlined in the MMMP is provided to the relevant Departments of the Isle of Man Government.</p>	<p>The Applicant notes and welcomes the response to the agreement of the proposed mitigation detailed in the outline marine mammal mitigation protocol (MMMP) (APP-072). The Applicant has received confirmation from MMO that the Isle of Man Government will be consulted on the pre-construction plans, where necessary. The Applicant will continue to engage with the Isle of Man TSC and the MMO on this matter.</p>
<p>REP1-047.8</p>	<p>2.4 Offshore ornithology The Isle of Man holds the closest breeding seabird colonies to the proposed development site. The TSC has particular concerns regarding impacts on Manx Shearwaters and Great Black Backed Gulls. It is noted from the ES that impacts on these species and the impacts to Manx breeding colonies in general are assessed to be negligible to minor. It is also noted and welcomed that the minimum blade tip height has been raised to 34m above LAT to reduce collision risk. Of critical importance will be the implementation of the EMP including measures to minimise disturbance to rafting birds from transiting vessels and an MPCP which will include planning for accidental spills addressing all potential contaminant releases.</p>	<p>The assessments conducted in Volume 2, Chapter 5: Offshore ornithology (APP-023) conclude that impacts on great black-backed gull and Manx shearwater will be of negligible or minor significance from the project alone and cumulatively with other plans and projects. The Applicant acknowledges the welcoming of the minimum blade tip height which has been incorporated into the project design to reduce impacts on ornithological receptors. The Offshore EMP and MPCP are also both measures adopted as part of the Morgan Generation Assets and are secured within the dMLs of the draft DCO (REP1-021).</p>
<p>REP1-047.9</p>	<p>2.5 Shipping and navigation The Isle of Man, through the Department of Infrastructure (DOI), Department</p>	<p>The Applicant notes the TSC response and welcomes that the Harbours Division is satisfied that all shipping and navigation impacts from the Morgan</p>

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	<p>of Enterprise (DfE) and Department of Food, Environment and Agriculture (DEFA) have International Maritime Organization (IMO) flag, port & coastal State obligations as part of the IMO Instruments Implementation (III) Code. The IMO instruments included in these obligations are:</p> <ul style="list-style-type: none"> • Safety of Life at Sea (SOLAS 1974 and its 1978 & 1988 Protocols, as amended); • Prevention of Pollution from Ships (MARPOL 1973 and Protocols 1978 & 1997, as amended); • Standards of Training, Certification and Watchkeeping for Seafarers (STCW 1978, as amended); • Load Lines (LL 66 and its 1988 Protocol); • Tonnage Measurements of Ships (Tonnage 1969); and, • Regulations for Preventing Collisions at Sea (COLREG 1972). <p>Department of Infrastructure (DOI), through the Harbours Division assumes responsibility for the coastal State obligations, including responsibility for Search & Rescue, Pollution, Salvage, and Safe Navigation in Manx Territorial Water. Harbours Division expects all relevant International Obligations to which the Island is a signatory and which are applicable to Manx territorial waters to be acknowledged and considered as part of the EIA.</p> <p>At this stage, and noting that it is based on the current proposal, Harbours is satisfied that from a shipping and Navigation perspective, all impacts or effects from the proposed development have been adequately identified.</p>	<p>Generation Assets have been adequately identified. The Applicant and TSC submitted a SoCG at Deadline 1 (REP1-034) and discussions are ongoing in relation to effects on the Isle of Man Steam Packet Company, for which there is a separate SoCG also submitted at Deadline 1 (REP1-033).</p>
<p>REP1-047.10</p>	<p>2.6 Other sea users</p> <p>The Manx Cable Company (MCC) own and operates, on behalf of the Manx Utilities Authority, a submarine power cable, referred to as the interconnector, which runs between Douglas Head in the Isle of Man and Bispham, Blackpool. With an undersea section of approximately 104km (65 mi), it is one the longest AC undersea cables in the world and is an essential means of maintaining secure supplies of electricity to the residents of the Isle of Man. This cable runs approximately 830m north of the proposed Morgan Array area. Several options for future interconnection, via a second sub-sea interconnector cable, are currently being considered with one potential off-shore cable route/corridor running to the north of the proposed Mona Array.</p> <p>The Applicant has engaged with Manx Utilities and between them have agreed principles around proximity etc to the existing interconnector. Based</p>	<p>The Applicant notes the TSC response regarding the Manx Interconnector.</p>

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<p>REP1-047.11</p>	<p>on these principles Manx Utilities consider that suitable conditions can be met regarding the proximity of the proposed development to the interconnector.</p> <p>2.7 Aviation and radar The EIA has identified Moderate Adverse impact during the operation of the wind farm. Ronaldsway Airport has undertaken a surveillance strategy to manage air traffic safeguarding which includes consideration of the proposed Morgan Offshore Wind Project. This report is currently under review to identify potential mitigation requirements. It is noted that the draft DCO contains a requirement for radar mitigation in relation to St Anne's and Lowther Hill (Schedule 2, Section 4) but there is no such requirement for Ronaldsway Airport despite mitigation being identified as required in the ES (document APP-015).</p>	<p>The Applicant notes that the following impacts were predicted for Isle of Man Airport (Ronaldsway) within Volume 2, Chapter 11: Aviation and radar (APP-015):</p> <ul style="list-style-type: none"> • Creation of physical obstacle to aircraft operations – Instrument flight procedures: moderate adverse significance, reducing to minor adverse significance following the implementation of mitigation measures to raise the impacted Surveillance Minimum Altitude Area (SMAA) • Wind turbines causing interference on aviation PSR systems: moderate adverse significance, reducing to minor adverse significance following the implementation of mitigation measures such as radar blanking, airspace change application and/or improvement of the airport MultiLATERation (MLAT) system. <p>The Applicant notes that engagement is ongoing with Ronaldsway and that a SoCG was submitted at Deadline 1 (REP1-038). This SoCG acknowledged the need for mitigation at Ronaldsway and the pending release of a report from NATS commissioned by Ronaldsway in relation to radar mitigation. An executive summary of this report has now been released to the Applicant and a follow up meeting held between the Applicant and stakeholder teams. This report identifies the broad nature and proposed technologies to be applied for radar mitigation.</p> <p>The Applicant will continue to work with the stakeholder team at Ronaldsway to assess the mitigation solution and advance any associated commercial terms required to support the deployment of this mitigation.</p> <p>As the Applicant has only recently received the report it is unlikely a revised SoCG will be submitted at Deadline 2, but further advances in engagement on these matters will be recorded through revised SoCGs at future deadlines.</p>
<p>REP1-047.12</p>	<p>2.8 Seascape, landscape and visual resources The SLIVA's establish that there will be significant effects on visual receptors on the Island, particularly on coastal landscape and impacting the Raad ny Foillan Long Distance Coastal Path. The turbines will be visible on the eastern horizon and although it is in the context of an expansive seascape with the presence of existing operational offshore windfarms the proposed development is closer to the Isle of Man than any current operational windfarms.</p>	<p>The Applicant acknowledges the comments from Isle of Man Government on the SLVIA for the Morgan Generation Assets. In so doing, the Applicant refers to Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014). In regard to the coastal landscape of the Isle of Man and the Raad ny Foillan Long Distance Coastal Path, the assessment concluded the following:</p> <ul style="list-style-type: none"> • Minor to moderate adverse and not significant effects on coastal landscapes on the Isle of Man (Landscape Character Type (LCT) E Rugged Coast, LCT D Incised Inland Slopes, and LCT H: Coastal Cliffs)

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REP1-047.13	<p>2.9 Socio-economics</p> <p>In general terms the TSC does not have concerns on potential socio-economic impacts of the proposed development, excepting the potential impact on the Isle of Man Steam Packet Company Ferry services, during adverse weather conditions that require routing changes. Whilst the impact of routing changes is not considered to be significant in general, there is still a potential of additional cancellation of services in poor weather conditions. As the Isle of Man is dependent on daily regular deliveries of foodstuffs and other consumable items, including medicines, additional cancellations will have an impact on daily life and could result in additional costs for the retailers on account of the delays or cancellations.</p>	<ul style="list-style-type: none"> Moderate adverse and not significant effects on people using Raad ny Foillan Coastal Pathway. <p>The Applicant welcomes this response and is engaging directly with the Isle of Man Steam Packet Company with regards to residual effects.</p> <p>Volume 2, Chapter 13: Socio-economics (APP-017) concluded the potential alone and cumulative impact on the Isle of Man associated with potential adverse effects on lifeline ferry services to be of minor adverse significance.</p>
REP1-047.14	<p>2.10 Cumulative effects</p> <p>As noted above, it is acknowledged that there are likely to be impacts on the Isle of Man for some of the receptors, notably fish and shellfish ecology, shipping and navigation, SLVIA amongst others. Due to the combination of existing and planned offshore windfarms in the East Irish Sea, these risks and impacts to the receptors increase. Of particular concern is the cumulative effects of the proposed Morgan, Mona, Morecambe and Moir Vannin offshore windfarms that are all in relatively close proximity.</p> <p>In terms of shipping and navigation, the cumulative effects from the proposed offshore windfarms does have the potential to impact more on shipping and navigation as there will be more requirements for deviating off established shipping routes to safely navigate around the proposed windfarms. It is noted that all of these cumulative effects have been taken into account as part of the relevant ESs submitted in support of these applications, and it is acknowledged that the Isle of Man has been represented at the Maritime Navigation Engagement Forums where they have all been discussed. Nevertheless, the risk remains, and the impacts could still affect the Isle of Man. The cumulative effects of the proposed offshore windfarms on the radar at Ronaldsway Airport is another significant consideration or impact to be taken into account. Although currently being evaluated the collective impact of the proposed developments is likely to be significant and require mitigation to ensure the Airport can continue to operate safely. As an Island nation any reduction in the function, capacity or operational sustainability of the Airport could have serious implications both economically and for life line services.</p>	<p>The cumulative effects of the Morgan Generation Assets, Mona Offshore Wind Project, Morecambe Offshore Windfarm: Generation Assets and Moir Vannin have been assessed within the application, in line with the cumulative effects assessment (CEA) methodology presented in Volume 1, Chapter 5: Environmental impact assessment methodology (APP-012). This includes a detailed assessment of potential cumulative effects on shipping and navigation, aviation and radar, SLVIA and commercial fisheries.</p> <p>The Applicant welcomes acknowledgement that all potential cumulative effects on shipping and navigation have been taken into account as part of the application, and that the Isle of Man has been represented at the Maritime Navigation Engagement Forum (MNEF) where cumulative effects have been discussed.</p> <p>As noted in the Applicant's responses above (REP1-047.9, REP1-047.11 and REP1-047.6), the Applicant continues to engage with the TSC, Isle of Man Steam Packet Company, Ronaldsway and Manx Fish Producers Organisation in the development of SoCGs.</p>

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	<p>It should also be noted that there will also likely be cumulative impacts in terms of SLVIA for the proposed R4 offshore windfarms, all of which will be visible from the Isle of Man, particularly from the identified locations above. Currently, it is possible to see some of the later offshore windfarm developments in close proximity to Manx waters, as built in the UK. However, with the proposed Morgan offshore windfarm abutting Manx waters, as well as the proposed Mooir Vannin offshore windfarm, turbines will be increasingly visible from the Island. There will also be the need to take into account the cumulative impacts on the Island's fisheries and stocks. The impact of construction activities of multiple windfarms has the potential to disrupt fish stocks and breeding with possible long term implications. The combination of multiple windfarms in the East Irish Sea is reducing the areas available for fishing potentially leading to a decrease in the economic performance of these fisheries. Additionally this reduction in available areas could result in displacement of fishing effort potentially leading to increased fishing pressure within Manx waters.</p>	