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UK Technical Services Navigation
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National Infrastructure Planning
Temple Quay House
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www.gov.uk/mca

8 November 2024

Your ref: EN010136

Dear Sir/Madam

**Application by Morgan Offshore Wind Limited for an Order Granting Development Consent for the Morgan Offshore Wind Project:
Generation Assets.**

Planning Act 2008 – Section 89 and The Infrastructure Planning (Examination Procedure) Rules 2010

Examination Timetable – Deadline 3

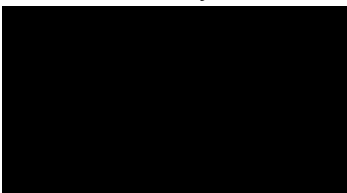
Thank you for inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Examining Authority as part of its assessment of the proposed generation assets for the Morgan offshore wind farm project. We would like to submit the following response to the first written questions (ExQ1).

Written Questions (ExQ1)

Question and reference		MCA Response
SN 1.1	<p>Navigational safety authority in Isle of Man Territorial Waters Please confirm whether the MCA (on behalf of the UK Government Department of Transport) is the navigation authority for Isle of Man Territorial Waters (outside harbour limits) as well as for the territorial waters and EEZ waters of Great Britain and Northern Ireland; and if not, who exercises in those waters the equivalent role or roles to those of the MCA.</p>	<p>The MCA is not the navigation authority for the Isle of Man territorial waters outside of statutory harbour authority limits. This falls to the relevant department in the Isle of Man Government.</p>
SN 1.2	<p>Sea lanes essential to international navigation within the UK EEZ Please confirm the following: i) If any of the navigational routes passing to east, south or west of the Proposed Development are considered by the MCA to be recognised 'sea lanes essential to international navigation' in terms of UNCLOS Article 60(7). ii) Whether any of the routes in (i) above might be considered to be designated and charted as a Traffic Separation Scheme (TSS) in the foreseeable future. iii) The minimum width between obstructions to navigation that a TSS would require.</p>	<p>i) In the context of paragraphs 2.8.316 and 2.8.317 in the National Policy Statement for Renewable Energy Infrastructure (EN-3), 'sea lanes essential to international navigation' is understood to mean IMO-adopted Traffic Separation Schemes. The navigation routes passing east, west and south of the proposed Morgan wind farm are not Traffic Separation Schemes, however they are considered to be strategic routes essential to regional, national and international trade. ii) There are no plans to propose the introduction of a new Traffic Separation Scheme in the Irish Sea. iii) N/A</p>
SN 1.3	<p>Sea lanes essential to international navigation within Isle of Man territorial sea Further to the MCA's Written Representation at Deadline 1 [REP1-051, item 9] regarding a residual separation distance of only 2.6nm of sea space between the boundary of the proposed Moir Vannin offshore wind development and the proposed northern boundary of the Morgan Generation Assets Proposed Development about 50metres inside UK EEZ waters, could the MCA clarify: i) Does that sea space between the two proposed developments constitute a 'sea lane essential to international navigation' in terms of UNCLOS Article 60(7). ii) What alternative separation distance might be sufficient to ensure that interference to international navigation through that sea space by would be unlikely in adverse metocean conditions, whether approaching Douglas Harbour or on international passage to the east of the Isle of Man. iii) Whether any part of that sea space between the two proposed offshore wind developments referred to above might be considered for designation and charting as a TSS in the foreseeable future, summarising considerations that would be taken into account in that regard.</p>	<p>i) The sea space between the proposed Morgan and Moir Vannin wind farms is not a Traffic Separation Scheme and does not constitute a 'sea lane essential to navigation'. ii) In determining the acceptable sea space between the two sites a Navigation Risk Assessment must be conducted. It is assumed this will be carried out by the applicant of Moir Vannin. iii) This decision will be subject to the results and conclusions of the Moir Vannin Navigation Risk Assessment.</p>

SN 1.4	<p>Stakeholder engagement post-consent</p> <p>i) In addition to monitoring and reporting, can the MCA confirm if continued stakeholder engagement post-construction is required to achieve compliance with the recommendations of Marine Guidance Note MGN654, in addition to monitoring and reporting other as noted in paragraph 6.6(c), or by any other MGN.</p> <p>ii) Does the MCA have guidance to offer on the minimum appropriate frequency of stakeholder engagement throughout the operation/maintenance phase and should it be secured explicitly by condition in the DMLs.</p>	<p>i) In addition to monitoring and reporting, stakeholder engagement with MCA would be expected for emergency response planning and preparedness throughout the lifetime of the wind farm, as per the requirements in MGN654 Annex 5. This will include maintaining effective emergency response and environmental plans, having robust emergency arrangements and regularly demonstrating emergency response exercise planning and execution.</p> <p>ii) There is no MCA guidance or requirements for the frequency of the engagement in the post-consent stage. There is no need to secure the frequency in the DML.</p>
SN 1.5	<p>Marine Guidance notes other than MGN654</p> <p>Would the MCA please confirm if there are any MGNs other than MGN654 that should be required to be followed in mitigation plans secured by the draft DCO/DMLs including the Outline Fisheries Liaison and Coexistence Plan [APP-065], the Outline Vessel Traffic Management Plan [APP-071] and the Outline Offshore Operations and Management Plan [APP-079]?</p>	<p>There is no other MCA guidance document to be followed by developers in regard to the post-consent plans secured in DMLs for offshore renewable energy installations.</p>
SN 1.6	<p>Minimum infrastructure spacing</p> <p>i) Please confirm that you accept the Applicant's proposal (as confirmed at ISH1) that the layout development principle "<i>minimum infrastructure spacing of 1,400m</i>" is to be measured from centre points of structures and is subject to reduction by the micrositing allowance and constructional tolerance dimension.</p> <p>ii) Please clarify what constructional tolerance dimension you would consider normal and acceptable in addition to the micrositing allowance that you have yet to agree with the Applicant and the MMO.</p>	<p>i) MCA is content for the minimum spacing to be measured from the structure centre points.</p> <p>ii) MCA would be content for the same tolerance and micrositing that has been agreed for the Mona offshore wind farm which is 50m for micro-siting and 5m for tolerance.</p>

Yours faithfully,



Nick Salter
 Offshore Renewables Lead
 UK Technical Services Navigation