

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

12 November 2024

Dear Ms Hunt,

**Morgan Offshore Wind Project Development Consent Order Application,
Response to the Examining Authority's first written questions and request for
further information (ExQ1)**

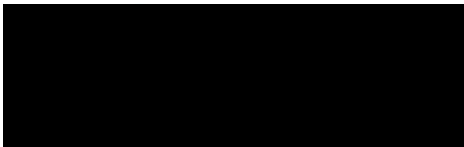
In its first written questions (ExQ1) the Examining Authority put six questions to Moor Vannin Offshore Wind Farm Limited. These covered topics including cumulative impacts to Primary Surveillance Radar and shipping and navigation. Please see attached in the following sheet the responses to those questions.


Attachments:

1. Indicative Layout and Order Limits (pdf and shapefile)
2. Moor Vannin PEI Project Description

Yours sincerely

For and on behalf of Moor Vannin Offshore Wind Farm Limited



Dr Julian Carolan
Moor Vannin Consent Project Manager
 orsted.com

Cross-Topic and General			
GEN1.5	Moor Vannin Offshore Wind Farm Limited	<p>Interrelationship report on other infrastructure projects</p> <p>An Interrelationship Report was submitted by the Applicant at Deadline 1 [REP1-017]</p> <p>The applicants of the other named projects which are IPs in this Examination are asked to provide comments on the content of the Report.</p>	<p>No assessment of Moor Vannin is provided in the Interrelationship Report due to the determination provided by the Applicant to the Low level of detail of project information available to inform the assessment. Moor Vannin provided Order Limits and an Indicative Layout to the Applicant in July 2023. We have a Non-Disclosure Agreement with the Applicant to allow information sharing and have had no request from the Applicant for further information.</p> <p>We share with the Applicant and the Ex.A Order Limits and an Indicative Layout (Aug 2024) used to inform our Preliminary Environmental Information (PEI) and 2nd Phase of Community Consultation in August and September 2024.</p> <p>As the Environmental Impact Assessment (EIA) concludes over the coming weeks and months the assessment outcomes, along with the baseline data to inform those assessments, can be shared with the Applicant on key receptors groups such as marine ecology and human environment. Hopefully this increases the level of detail provided to the Applicant to facilitate the conclusion of the relevant assessments.</p>
AR Aviation and Radar			
AR1.6	Moor Vannin Offshore Wind Farm Limited	<p>Mitigation of cumulative impacts</p> <p>Your Relevant Representation [RR-021] notes that it is not clear how potential mitigation methods including the use of additional MultiLAT sensors would be implemented to contribute to mitigation of cumulative impacts at Ronaldsway Airport.</p>	<p>Moor Vannin are aware that the Isle of Man Airport have now received their surveillance strategy report. A high-level summary of this report has been shared with Moor Vannin and an initial meeting held with the Isle of Man Airport regarding the outcomes and mitigation identified in this report. Further engagement regarding the requirement for, and implementation of, mitigation is</p>

		<p>The Applicant's response (p.86 [PD1-017]) points to section 11.10 of ES Volume 2, Chapter 11 [APP-015], but also notes that in February 2024, the Airport's position changed to commissioning a review of its surveillance strategy including all applicable proposed offshore and onshore wind farm projects (the results of this were expected in summer 2024) and requesting relevant projects to contribute to reach a mutually agreed mitigation solution which will reduce any impact to acceptable levels.</p> <p>Could Moor Vannin Offshore Wind Farm Limited clarify if it has any further comments to raise on this matter?</p>	<p>ongoing with the Airport. Moor Vannin is aware that the Airport will require further engagement with all OWF developers in the area (including the Applicant), to be able to reach a final mitigation solution that will reduce cumulative impacts to an acceptable level.</p>
<p>CE Cumulative Effects</p>			
<p>CE1.5</p>	<p>Applicant Moor Vannin Offshore Wind Farm Limited</p>	<p>Moor Vannin Offshore Wind Farm Moor Vannin Offshore Wind Farm Limited [RR-021] sets out that a Scoping Report was submitted to the Isle of Man Government in 2023 and that it is preparing to submit an application for Marine Infrastructure Consent in 2025. Concerns relate to cumulative and incombination effects, and potential mitigation. The Applicant's summary of ISH1 [REP1-004] at point 53 notes that the only information in the public domain for Moor Vannin Offshore Wind Farm is a Scoping Report and 'limited other consultation materials', which it considers to be 'insufficient information on which to base a meaningful cumulative assessment with a high degree of certainty'. Paragraph 1.2.1.5 of the Interrelationship Report [REP1-017] notes that only the Scoping</p>	<p>Moor Vannin confirms that the information available within the public domain for Moor Vannin Offshore Wind Farm is an EIA Scoping Report and Preliminary Environmental Information (PEI). The PEI Project Description, Indicative Layout and Order Limits provide information on which to base assessment and are attached to this submission.</p> <p>While the PEI material that is publicly available may be considered early-stage environmental information they do differ from the materials in the Scoping Report. Some of this material (Order Limits and Indicative Layout) has been shared with the Applicant previously (July 2023) at their request.</p> <p>While not publicly available, Moor Vannin have completed draft impact assessments to inform our Marine Infrastructure Consent (MIC) Application. These</p>

	<p>Report and early stage environmental information is publicly available. Paragraph 1.3.1.3 notes that ‘Moor Vannin Offshore Wind Farm is currently in early stages of the pre-application process’, and therefore specific coordination was not carried out due to the different project timelines.</p> <p>The Applicant is asked to clarify the publicly available ‘early stage environmental information’ and ‘limited other consultation materials’, on which it has based its CEA and Interrelationship Report. Moor Vannin Offshore Wind Farm Limited is asked to provide:</p> <ul style="list-style-type: none"> i) A copy of the Scoping Report and Scoping Opinion. ii) A timeline for the project, including stages of past and future consultation, submission of an application to the Isle of Man Government, and if such an application is successful the predicted timescales for commencement of development and operation of the wind farm. iii) A plan of the site boundary and array area as currently proposed, shown in relation to the Morgan Offshore Wind Project: Generation Assets, and territorial boundaries. iv) The maximum design scenario as currently proposed. v) Details of the proposed location(s) for landfall and the onshore electricity transmission connection. vi) Any other publicly available information about the project it would like to submit into the Examination. 	<p>are available upon request to ensure a complete assessment (for Ornithology, Aviation, SLVIA, Fish and Fisheries and Marine Mammals).</p> <p>The following sections address the numbered comments in the Ex.A Questions which are replicated and underlined for clarity.</p> <ul style="list-style-type: none"> i) <u>A copy of the Scoping Report and Scoping Opinion.</u> The Scoping Report and Scoping Opinion are attached to this submission. ii) <u>A timeline for the project, including stages of past and future consultation, submission of an application to the Isle of Man Government, and if such an application is successful the predicted timescales for commencement of development and operation of the wind farm.</u> The timeline of the project is summarised below: <ul style="list-style-type: none"> • Submission of EIA Scoping Report - November 2023 • Phase 1 Community Consultation - November 2023 • Publication of Preliminary Environmental Information (PEI) - August 2024 • MIC Application - anticipated March 2025 • Examination - anticipated July to December 2025 • MIC Consent Award - anticipated June 2026 • Construction Start - anticipated Q2 2030 iii) <u>A plan of the site boundary and array area as currently proposed, shown in relation to the Morgan Offshore Wind Project: Generation Assets, and territorial boundaries.</u>
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			<p>Community Consultation. The consultation feedback will be used to inform material changes to the project prior to Application. Any changes to the provided Indicative Layout and Order Limits will be shared with the Applicant and Ex.A in a timely manner.</p> <p>vii) <u>Comments on the Interrelationship Report and the accuracy of Tables 1.1 and 1.2.</u></p> <p>Please see comments above.</p>
CE1.6	<p>Applicant</p> <p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Spacing between Morgan and Moor Vannin Arrays</p> <p>While the proposed Moor Vannin offshore windfarm would be situated in Isle of Man territorial waters and is not subject to the Crown Estate Round 4 Memorandum which specifies that no offshore wind projects could be located within 7.5km of an existing offshore wind farm, it is nonetheless noted that the distance between the Morgan Array Area to the proposed Moor Vannin offshore wind farm would be as little as 4.8km. Would the Applicant and Ørsted Moor Vannin explain the implications of this for both projects and whether there would need to be an adjustment to the layout or site area of one or both arrays to increase the separation (and if so, which array requires adjustment)?</p>	<p>During discussions between Moor Vannin and shipping operators who regularly transit the route between the proposed Morgan and Moor Vannin Offshore Array areas, it has been raised that the 4.8km 'gap' between the two projects does not provide a safe navigable space for transitting vessels. Moor Vannin is also aware that this has been raised to the Applicant via the Marine Navigation Engagement Forum meetings, Hazard Workshop and consultation responses.</p> <p>Moor Vannin is aware that this area of sea has the potential to be highly congested and so provided the Applicant with a copy of the Moor Vannin AfL boundary in October 2022 to facilitate early consideration of the cumulative impacts ahead of Moor Vannin's Scoping Report submission in October 2023. However, it is noted that Moor Vannin was not included in the Applicant's PEIR as this was published prior to Scoping Report submission, and was instead only included withni the Environmental Statement submitted at Application. The response below to SN1.8 outlines the further engagement with the Applicant on shipping and navigation in the area.</p>

			It is recognised by Moor Vannin that further refinement will be needed by either one or both of the projects to increase the space between them. However, Moor Vannin maintains that it is unreasonable for the Applicant to assume all further mitigation will be undertaken by Moor Vannin without meaningful engagement on this topic
SN Shipping and Navigation			
SN1.8	Moor Vannin Offshore Wind Farm Limited	<p>Cumulative and inter-related navigational risk assessment between Moor Vannin and Morgan OWF developers</p> <p>i) Provide an update report on contact between the Moor Vannin OWF project developer and the Applicant for the Morgan Generation Assets project, specifically having regard to navigational safety concerns expressed by the MCA in [REP1-051].</p> <p>ii) Advise if a Cumulative Regional Navigational Risk Assessment (NRA) will be carried out to take account of existing infrastructure in the east Irish Sea plus the proposed Morgan Generation Assets and Morecambe Generation Assets and Mona offshore wind projects.</p> <p>iii) Summarise the policy considerations related to navigational safety and coexistence with other sea users which are being taken into account by Moor Vannin Offshore Wind Farm Limited.</p>	<p>i) Prior to the beginning of the Morgan OWF Examination, the engagement between the Applicant and Moor Vannin Offshore Windfarm included:</p> <p>08/02/2024: Moor Vannin attended MNEF 6 virtual meeting</p> <p>12/12/2023: Meeting between representatives of Morgan, Morecambe and Mona (MoMoMo) Projects.</p> <p>27-28/09/2023: Moor Vannin attended Hazard Workshop but unable to comment on conclusions of assessments in workshop as we had not yet undertaken our own Navigational Risk Assessment, and Moor Vannin not included within draft NRA presented.</p> <p>21/09/2023: Moor Vannin attended Marine Navigation Engagement Forum (MNEF) 5 virtual meeting</p> <p>24/03/2023: Meeting between representatives of MoMoMo Projects and Moor Vannin consents team.</p> <p>18/01/2023: Moor Vannin invited to and attended MNEF 4 virtual meeting</p> <p>20/10/2022: Introductory meeting between representatives of MoMoMo Projects and Moor Vannin consents team to discuss engagement and programme.</p> <p>11/10/2022: Moor Vannin formal submission of AfL coordinates and request to be included in baseline</p>

			<p>assessments and Hazard Workshops regarding NRA to MoMoMo Projects.</p> <p>Moor Vannin have had no engagement with the Applicant regarding Shipping and Navigation since the beginning of their Examination in September 2024. With regards to the gap between the two projects, Moor Vannin have continued engagement with both the operators of the Douglas-Heysham Route and the MCA, and will be holding a Hazard workshop in December 2024, to which the Applicant is invited.</p> <p>ii) The final Navigational Risk Assessment to be submitted at Application (March 2025) to the Isle of Man Government will include a cumulative effects assessment taking into account the existing infrastructure in the east Irish Sea, as well as those projects that fall within the study area. This includes the Morgan, Mona and Morecambe Offshore Windfarm generation projects.</p> <p>iii) As the Moor Vannin Offshore Wind Farm falls wholly within the Isle of Man territorial seas, it falls under the jurisdiction of the Isle of Man government. In instances where Isle of Man specific policy and legislation does not exist, it has been agreed appropriate with stakeholders on the Isle of Man that Moor Vannin follow relevant UK guidance. As such, a summary of the legislation, policy and guidance related to shipping and navigation that is of relevance to the Moor Vannin Offshore Wind Farm navigational risk assessment is tabulated in a separate table below.</p>
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<p>SN1.9</p>	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Finalising design envelope and NRA for the Moor Vannin OWF application Could Moor Vannin Offshore Wind Farm Limited confirm when it anticipates finalising its design envelope and NRA for application to the relevant consenting authority(ies), and will it be collaborating with the developer of the Morgan Generation Assets project in updating the Cumulative Regional NRA such that it might helpfully inform the ExA before the close of Examination.</p>	<p>Moor Vannin is currently in the process of finalising the design of the project. With regards to shipping and Navigation, a draft Navigational Risk Assessment has been drafted for Moor Vannin and shared with shipping operators for initial comment on potential routing impacts and a Hazard Workshop is planned for December 2024. The Applicants for Morgan, Mona and Morecambe Offshore Wind Farms have been invited to attend the Hazard Workshop.</p> <p>Following the hazard workshop, Moor Vannin will be in a position to share information with the ExA on the final design of the project to be submitted at Application. Updating and/or reporting on the NRA will be done for final application following the Hazard Workshop and will be completed by Application (March 2025). As such, the final NRA including any updated design information, may not be available to the ExA of the Morgan OWF project before the close of their examination.</p>
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Additional to SN1.8. The below table shows the legislation, policy and guidance of relevance to shipping and navigation for Moor Vannin.

Legislation, policy or guidance	Relevance to topic
<i>National legislation</i>	
Isle of Man Harbours Act 2010	Provides information relating to Isle of Man harbours and their operation including harbour limits, reporting requirements and pilotage.
<i>International legislation and agreements</i>	
Convention on the International Regulations for Preventing Collisions at Sea (COLREGS) as amended (International Maritime Organization (IMO), 1972/77)	Dictates the manner by which all sea going vessels should navigate, including in relation to look-out (Rule 5), safe speed (Rule 6), and reduced visibility (Rule 19).
International Convention for the Safety of Life at Sea (SOLAS) as amended (IMO, 1974)	Chapter V identifies provisions relating to safety of navigation applicable to all vessels, including distress messages (Regulation 33) and passage planning (Regulation 34).
United Nations Convention on the Law of the Sea (UNCLOS) (United Nations (UN), 1982)	Establishes rules governing all uses of oceans and seas.
<i>National policy</i>	
The Island Development Plan - The Isle of Man Strategic Plan 2016 – Section 11 Transport, Infrastructure and Utilities.	This sets out an Island-wide policy framework and general policies for the development of and use of land within the Isle of Man and marine environment within the Isle of Man’s jurisdiction. Transport Policy 13 states that use of a harbour by commercial or recreational users should not be compromised by nearby development.
<i>Guidance</i>	
Manx Marine Environmental Assessment, Infrastructure Shipping and Navigation	Outlines baseline information relating to Shipping and Navigation and summarises effects which potential marine developments may have on Shipping and Navigation.

Legislation, policy or guidance	Relevance to topic
MGN 654 and its annexes (Merchant and Fishing) Safety of Navigation: Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response (MCA, 2021)	Highlights issues that need to be taken into consideration when assessing the impact on navigational safety and emergency response caused by OREIs and provides a methodology for assessing navigational safety risks (annex 1).
Revised Guidelines for FSA for Use in the IMO Rule-Making Process (IMO, 2018)	Outlines the FSA methodology as a tool which may be used in the IMO rule-making process including the five-step process to the FSA.
International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) Guideline G1162 Guidance on the Marking of Offshore Man-Made Structures (IALA, 2021 (a)) and IALA Recommendations O-139 on The Marking of Man-Made Offshore Structures (IALA, 2021 (b))	Provides guidance for the marking of man-made offshore structures including general considerations and specific information associated with offshore wind farms.
The Royal Yachting Association’s (RYA) Position on Offshore Renewable Energy Developments: Paper 1 (of 4) – Wind Energy (RYA, 2019)	Sets out the RYA’s position in relation to offshore wind development to enable developers to take accurate account of recreational boating concerns when developing NRAs.
MGN 372 Amendment 1 (Merchant and Fishing) OREIs: Guidance to Mariners Operating in the Vicinity of UK OREIs (MCA, 2022).	Highlights the issues to be considered when planning and undertaking voyages in the vicinity of OREIs in UK waters.
Standard Marking Schedule for Offshore Installations (DECC, 2011).	Provides details and specifications for lighting and marking of offshore installations, noting that this includes compliance with the current IALA recommendations.
UK Marine Policy Statement (His Majesty’s (HM) Government, 2011).	Provides a spatial planning approach to the management of the UK Exclusive Economic Zone (EEZ) including the Isle of Man, with potential impacts relating to ports and shipping considered.