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Morgan Offshore Windfarm Generation Assets Case Team
Planning Inspectorate
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(Email only)

MMO Reference: DCO/2022/00003
Planning Inspectorate Reference: EN010136
Identification Number: 20048964

12 November 2024

Dear Susan Hunt,

Planning Act 2008, BP Alternative Energy Investments Ltd, Proposed Morgan Offshore Windfarm Generation Assets Order

Deadline 3 Submission Summary

On 30 May 2024 the MMO received notice under Section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by bp Alternative Energy Investments Ltd, (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Morgan Generation Offshore Windfarm (the DCO Application) (MMO ref: DCO/2022/00003 PINS ref: EN010136).

The DCO Application seeks authorisation for the construction, operation and maintenance of Morgan Offshore Windfarm Generation Assets (MOWF) located approximately 22 kilometres (km) from the Isle of Man Coastline and approximately 37 km from the Northwest coast of England; comprising of up to 96 wind turbine generators, all associated array area infrastructure and all associated development in an area approximately 280 square kilometres (km²).

Two Deemed Marine Licences (DML) are included in the draft DCO. One in relation to Wind Turbine Generators (WTG) and Associated Infrastructure, and one for Offshore Substation Platforms and Interconnector Cables.

As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions drafted in a deemed marine licence enable the MMO to fulfil these obligations.



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This document comprises the MMO's summary of the submission for Deadline 3. This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely



Liam Woods
Marine Licensing Case Officer

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1. Responses to Examining Authorities Questions (ExQ1)

- 1.1. The MMO has responded to all relevant questions from EXQ1 in table 1 of the Deadline 3 submission.
- 1.2. The MMO has delayed a response to several questions whilst a review takes place with the MMO's technical advisors.

2. Comments on update to the draft Development Consent Order (REP2-011)

- 2.1. The MMO has provided detailed comments regarding ongoing issues regarding the draft Development Consent Order within Table 2 of the Deadline 3 Submission.
- 2.2. The MMO welcomes the amendments made by the Applicant following requests from the MMO at previous deadline's but notes that there are several outstanding comments which require the Applicant's attention and action. The MMO will look to see these resolved in the coming deadlines.
- 2.3. The MMO considers there to be several points that require amending within the DCO and DML.

3. Comments on the progress tracker or Statement of Commonality (REP2-008)

- 3.1. The MMO attended a meeting with the Applicant on 24 October 2024 and 05 November 2024 in which the categorisation of issues listed in the Statement of Common Ground (SoCG) were discussed. There was no disagreement between the MMO and the Applicant as to the status of any listed issues.
- 3.2. Ongoing issues relate mainly to fish & shellfish, as discussed in sections 4 and 5 respectively, along with ongoing issues relating to marine mammals, coastal processes and the draft DCO/DML.
- 3.3. The MMO welcomes future engagement with the Applicant and hopes to resolve the remaining points on our SoCG in a timely manner.

4. Comments on Applicant's DL1 Submissions with Regards to Fish Species, Seasonal Piling Restrictions and Underwater Sound Management Strategy



- 4.1. The MMO has provided detailed reasoning as to the need for seasonal piling restrictions and the development of the Underwater Sound Management Strategy (UWSMS).
- 4.2. The MMO has also provided the Applicant with the necessary evidence sources to assist in adequate modelling to potentially refine decisions of a piling restriction covering the whole of the cod spawning season

5. MMO Response to Applicant's Statement of Common Ground (SoCG) and Pre-Examination Submissions Regarding Shellfish

- 5.1. The MMO has requested further shellfish modelling and that shellfish larval stages are considered in the UWSMS.
- 5.2. The MMO notes that the Applicant has amended the SoCG to reflect the current position of the MMO following the advice detailed above. The MMO awaits the requested information, which the Applicant has committed to providing.

6. Comments on Annex 3.1 to the Applicant's response to Written Representations from the Marine Management Organisation at Deadline 2 (REP2-006)

- 6.1. The MMO thanks the Applicant for providing the requested documents which shows compliance with the North West Inshore and North West Offshore Marine Plan

7. Comments on the Offshore in-principle monitoring plan (REP2-013)

- 7.1. The MMO is currently reviewing this document with its technical advisors and will provide a response at Deadline 4.
- 7.2. The MMO has also requested further Invasive Non-Native Species (INNS) should they be identified.

8. Comments on the Mitigation and monitoring schedule (REP2-15)

- 8.1. The MMO is currently reviewing this document with its technical advisors and will provide a response at Deadline 4.
- 8.2. The MMO notes that cable monitoring has been included in the Outline In Principle Monitoring Plan (IPMP) and the MMO believes there will be an overview within this document at the post consent/pre-construction stage. Although the Construction



Method Statement (CMS) is submitted at the pre-construction stage this can approve all monitoring for the project.

- 8.3. The MMO notes there are alternatives such as standalone cable and scour installation and monitoring plans alongside the CMS and IPMP on other projects that cover the whole timeline in one document, this is usually to cover more specific environmental concerns but could be adapted in this instance if required

9. Comments on the Outline vessel traffic management plan (REP2-017)

- 9.1. The MMO has reviewed the Outline Vessel Traffic Management Plan and has no comments to make at this deadline. The MMO defers to the Maritime and Coastguard Agency (MCA) and Trinity House (TH) on matters of shipping and navigation and the MMO will keep a watching brief over comments raised on review of the document (REP2-017). The MMO will continue to be part of the discussions relating to securing any mitigation, monitoring or other conditions required within the DMLs

10. Comments on the Outline fisheries liaison and co-existence plan (REP2-019)

- 10.1. The MMO has reviewed the Outline Fisheries Liaison and Co-existence Plan (FLCP) and has no comments to make at this time. The MMO will however, keep a watching brief over the response from the National Federation of Fisherman's Organisation (NFFO) and provide comment at Deadline 4.

11. Comments on the Operations and Maintenance (O&M) Plan

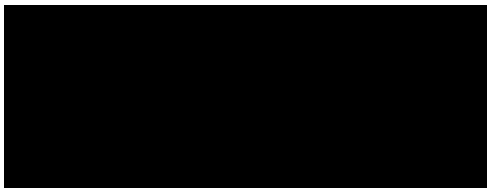
- 11.1. The MMO has no concerns regarding the scoping out of accidental pollution during construction, operations and maintenance and decommissioning due to the Applicants commitment to implement industry good practice standards (International Convention for the Prevention of Pollution from Ships) and adherence to the plans set out in the Environmental Monitoring Plan and Marine Pollution Contingency Plan.
- 11.2. The MMO requests a table is included within the plan that identifies the worst case scenario for all activities that will take place in the O&M phase, so it is clear at this stage what activities the assessment is for



12. Attendance at Issue Specific Hearing 2 (ISH2)

12.1. The MMO understands the ExA have requested attendance at the ISH on 26 & 27 November, this was dependant on what was submitted at DL3. The MMO will have no additional information on top of what is submitted within this response and therefore will not be attending the ISH. The MMO will keep a watching brief on any issues or action points raised and will continue to work through issues with the Applicant between deadlines.

Yours sincerely



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