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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Annex 4.4 to the Applicant's response to EXQ1: SLVIA Clarification note

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Image of an offshore wind farm

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Contents

1 ANNEX 4.4 TO THE APPLICANT'S RESPONSE TO EXQ1: SLVIA CLARIFICATION NOTE 1
1.1 Introduction 1
1.2 Assessment of effects resulting from the Morgan Generation Assets alone 1
1.3 Cumulative effects resulting from Morgan Generation Assets 6
1.4 Response to ExA Q SLV 1.5 15

Tables

Table 1.1: Summary of effects on landscape and seascape receptors during operations and maintenance as presented within the application compared with those presented in this clarification note. 19
Table 1.2: Summary of effects on visual receptors during operations and maintenance as presented within the application compared with those presented in this clarification note. 19
Table 1.3: Summary of cumulative effects on landscape and seascape receptors during operations and maintenance as presented within the application compared with those presented in this clarification note (Scenario 3). 20
Table 1.4: Summary of cumulative effects on visual receptors during operations and maintenance as presented within the application compared with those presented in this clarification note (Scenario 3). 21

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
CEA	Cumulative Effects Assessment
GLVIA3	Guidelines for Landscape and Visual Impact Assessment: Third Edition
LCT	Landscape Character Type
MCA	Marine Character Area
SLVIA	Seascape, Landscape and Visual Impact Assessment
SSZ	Seascape sensitivity zone
ZTV	Zone of Theoretical Visibility

Units

Unit	Description
km	Kilometres

1 ANNEX 4.4 TO THE APPLICANT'S RESPONSE TO EXQ1: SLVIA CLARIFICATION NOTE

1.1 Introduction

1.1.1.1 This document has been prepared in response to the Examining Authority's (ExA's) First Written Questions, specifically SLV 1.3, SLV 1.5 and SLV 1.6 in relation to the seascape, landscape and visual impact assessment (SLVIA), addressed to the Applicant. The responses to these questions are set out as follows:

- SLV 1.6: Marine Character Area (MCA) 38 (section 1.2)
- SLV 1.3: Cumulative Visual Effects: Raad ny Foillan Coast Path, Douglas and Laxey (section 1.3)
- SLV 1.5: Visual effects on people using the main ferry routes (section 1.4).

1.1.1.2 The Examining Authority raised a number of questions (noted above) in connection with Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014). These questions asked, amongst other things, if more clarity could be provided on some of the terminology used in the assessment conclusions, including where there was a 'moderate to major' adverse effect identified, or where the overall conclusion was 'potentially significant'.

1.1.1.3 A number of the receptors assessed (e.g. a coastal path) would be experienced in transit, rather than having a single view point, and therefore the magnitude of impact (and overall significance of effect) can vary across the receptor as a whole. Similarly, for certain seascape or landscape character types there would be a variation in magnitude dependent on proximity to the Morgan Generation Assets and the nature of the baseline. This was reflected in several of the assessment conclusions.

1.1.1.4 To provide greater clarity of the assessment conclusions and where significant effects are likely to occur, and to ensure a consistent approach, the Applicant has in this document undertaken a more detailed assessment of the receptors, in particular, where there was a conclusion of 'moderate to major adverse effect' or 'moderate adverse effect'. This clarification note seeks to provide a more detailed breakdown of where significant effects might occur and their overall extent in the context of a receptor as a whole.

1.2 Assessment of effects resulting from the Morgan Generation Assets alone

1.2.1.1 This section of this clarification note concerns the effect of the Morgan Generation Assets alone. It provides a response to ExA Question SLV 1.6 concerning the effect of the Morgan Generation Assets on MCA 38 Irish Sea South. It also provides clarification (by way of further detail) concerning the effect of the Morgan Generation Assets on landscape character and visual receptors on the Isle of Man.

1.2.2 MCA 38 Irish Sea South

1.2.2.1 The ExA Question SLV 1.6 concerning the effect of the Morgan Generation Assets on MCA 38 Irish Sea South is as follows:

'Can the Applicant explain why the assessments of effects for Marine Character Area 38, are inconsistently rated "moderate to major adverse" are reported as "not

significant" [APP-014 paras 10.8.2.15 and 10.8.2.22] and "(significant)" in [APP-014, Table 10.23].

1.2.2.2 The Applicant confirms that the assessment in paragraph 10.8.2.15 relates to the effect of the Morgan Generation Assets on the seascape character of MCA 38 during construction and decommissioning and concludes a **minor to moderate** and **not significant** effect for MCA 38 Irish Sea South when considered as a whole.

1.2.2.3 The Applicant notes that the assessment in paragraph 10.8.2.22 relates to the effect of the Morgan Generation Assets on the seascape character of MCA 38 during operations and maintenance and concluded a **moderate to major** and **not significant** effect for MCA 38 Irish Sea South when considered as a whole, as follows:

- Paragraph 10.8.2.19 states '*The magnitude of the seascape impact within Morgan Array Area itself (MCA 38 Irish Sea South) during operations and maintenance is deemed to be **large**. The potential impact on the seascape character of MCA 38 will reduce with distance from Morgan Array Area. The magnitude of impact on MCA 38 Irish Sea South considered as a whole is judged to be **medium to large**. This reflects the scale of the change which will diminish with increasing distance to the Morgan Generation Assets over the full extent of the MCA*'.
- Paragraph 10.8.2.22 then states '*The magnitude of the seascape impact within Morgan Array Area itself (MCA 38 Irish Sea South) during operations and maintenance is deemed to be **large**. The potential impact on seascape character will reduce with distance from Morgan Array Area. In this regard, a **medium to large** magnitude of impact will arise overall for MCA 38 and the sensitivity of the receptor is considered to be low to medium. The effects are, judged to be **moderate to major** adverse and **not significant***'.

1.2.2.4 The Applicant wishes to clarify effects on MCA 38 during operation and maintenance, in order to distinguish between the effect within and close to the Morgan Array Area and the effects when considered for MCA 38 as a whole. The Applicant clarifies that, within and close to the Morgan Array Area, a **large** magnitude of impact will arise to MCA 38, which is of **low to medium** sensitivity, resulting in a **moderate to major** adverse effect which is **significant**.

1.2.2.5 The Applicant also clarifies that the magnitude of impact on MCA 38 Irish Sea South, when considered as a whole, is judged to be medium resulting in a moderate and not significant effect. This reflects the fact that effects would be greatest in the northwest part of MCA 38 in the vicinity of the Morgan Generation Assets, but would diminish with increasing distance towards the south eastern part of MCA 38.

1.2.3 Isle of Man Landscape Character Types

1.2.3.1 In responding to ExA Q SLV 1.6, the Applicant has carried out a review of the effects of the Morgan Generation Assets on Isle of Man Landscape character types during operations and maintenance and wishes to provide clarification. The assessment presented in paragraphs 10.8.3.17, 10.8.3.18 and 10.8.3.19 in APP-014 state the following:

*1.2.3.2 'The magnitude of impact on LCT E Rugged Coast is considered to be **small to medium** at most during the operations and maintenance phase reducing to lower magnitudes with distance. An overall **small** magnitude of impact is considered to arise. This reflects the extent of the coastal LCT that would be affected and also the size and scale of the change resulting from the Morgan Generation Assets at distances of over 20 km.*

1.2.3.3 *The magnitude of impact on LCT D Incised Inland Slopes is considered to be **small**. This takes account of the more limited extent of the LCT that would be affected by the Morgan Generation Assets which will be less than that highlighted in the ZTV due to the screening by vegetation and structures. This also reflects the scale of the change resulting from the Morgan Generation Assets at distances of 22 km or greater.*

1.2.3.4 *A **small** magnitude of impact is expected to arise on LCT H Coastal Cliffs. This reflects the extent of the effects which would be mostly limited to the east coast of the island along with the scale of the change resulting from Morgan Generation Assets at distances of 25 km or greater.'*

1.2.3.5 Paragraph 10.8.3.21 in APP-014 then concludes *'A **minor to moderate** adverse and not significant [effect] will arise to LCT E, LCT D and LCT H. It is noted that the effects on LCT E are nearer to the moderate end of the minor to moderate range compared with LCT D and H*.'

1.2.3.6 The assessment recognises that the effects resulting from the addition of the Morgan Generation Assets will vary throughout the landscape on the east coast of the Isle of Man. This reflects the varying baseline conditions and the varying extent to which Morgan Generation Assets will influence landscape character.

1.2.3.7 Analysis of the Zone of Theoretical Visibility (ZTV) for the Morgan Generation Assets indicate that effects will arise over most of LCT E Rugged Coast on the east coast of the Isle of Man (LCT E on the west coast being unaffected). This is due mainly to the fact that LCT E comprises mostly an area of sea extending a short distance inland covering the immediate coastline.

1.2.3.8 Regarding LCT D Incised Inland Slopes and LCT H Coastal Cliffs, the ZTV for the Morgan Generation Assets indicates lower levels of effect than that indicated for LCT E and this is due to the following:

- LCT D Incised Inland Slopes covers areas of land close to the coastline and extensive areas of land inland and further away from the Morgan Generation Assets. The ZTV reveals lower levels of effect compared with LCT E and these effects will, in reality, be lower due to the screening afforded by wooded vegetation and buildings.
- In regard to LCT H, effects will be limited to a part of Maughold Head and the east coast near Port St Mary within LCT H, with other areas on the south and west coast unaffected.

1.2.3.9 The Applicant wishes to clarify that, a **small to medium** magnitude of impact will arise to LCT E Rugged Coast, which is of **medium to high** sensitivity, resulting in a **moderate** adverse effect which is **significant**.

1.2.3.10 The Applicant confirms that, a **small** magnitude of impact will arise to LCTs D and H resulting in a **minor to moderate** adverse and **not significant** effect.

1.2.4 People on the Raad ny Foillan Coast Path

1.2.4.1 In regard to people on the Raad ny Foillan Coast Path, the ZTV for the Morgan Generation Assets indicates visual effects along sections of this route on the east coast of the Isle of Man from the Point of Ayre south to The Langness Peninsula and the coast near Port St Mary. There will be no effects on viewers on the Raad ny Foillan Coast Path on the west coast of the Isle of Man.

1.2.4.2 The assessment recognises that the visual effects resulting from Morgan Generation Assets will vary along the length of the Raad ny Foillan coast path on the east coast

of the Isle of Man. This reflects the varying baseline conditions and the varying extent of visibility.

1.2.4.3 Analysis of the ZTV for the Morgan Generation Assets and the baseline conditions indicate that the effects will generally be higher along the more exposed sections of the coast path, closest to the Morgan Array Area, on the coastal edge from which panoramic views of the Irish Sea are available. These effects would be experienced along short sections of the coast path at Douglas Head (Representative Viewpoint 19), Douglas Promenade (Representative Viewpoint 49) and Old Laxey (Representative Viewpoint 43).

1.2.4.4 From these locations, viewers will see the Morgan Generation Assets in the foreground. Some of the Northwest England cluster of existing turbines will be barely visible in the distance during weather conditions that afford excellent visibility. These visual effects would be experienced, in a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.2.4.5 Visual effects will generally be lower on sections of the coast path which are located inland, from which, views of the coast and the Irish Sea are more restricted due to the screening afforded by intervening vegetation and structures or on sections of the route where the focus of the view is on more localised coastal features. These include:

- The coast path between a point south of Maughold Head to Old Laxey is mostly located inland, parts of which are aligned along the A15 road and other minor roads. Viewers on this section of the coast path will experience intermittent partial views of the coast and the Irish Sea. The visual effects will be less that that indicated in the ZTV due to the screening afforded by wooded vegetation and buildings.
- The coast path extends south of Laxey following the line of the A2 road, a little inland from the coast, to Baldrine. The coast path follows a minor road extending out near the coastal edge at Clay Head thereafter extending inland to Groudle Glen. The ZTV indicates effects on viewers on the coast path between Old Laxey and Garwick Glen (north of Baldrine) and at shorter sections near Clay Head and approaching Groudle Glen. The cumulative ZTV indicates no effects at Baldrine and an inland section from a point south of Clay Head to a point north of Growdle Glen. Cumulative effects will be less than that indicated on the ZTV due to the screening by intervening wooded vegetation, built structures, clusters of dwellings and settlements.
- The coast path at Derby Haven Bay extends along a road around the bay passing Ronaldsway Airport and Castletown Golf Links. Existing views are likely to be focused on features in the foreground including Langness Peninsula and St Michael's Island. Although the ZTV for the Morgan Generation Assets indicates effects on viewers on this section of the coast path, the viewer's attention will be drawn to the foreground features of Langness and St Michael's Island.
- The coast path extends around Castletown Bay which has an outlook in a southerly direction (away from the Morgan Generation Assets) framed by Dreswick Point on the Langness Peninsula and Scarlett Point. The Morgan Generation Assets will have limited visual effect in reality due to screening by intervening vegetation, localised topography and structures.

1.2.4.6 The Applicant wishes to clarify that the moderate adverse and not significant effects reported in APP-014 are confirmed as **moderate** adverse and **significant** on the more exposed sections of the coast path, closest to the Morgan Generation Assets and from

which panoramic views of the Irish Sea are available. The Morgan Generation Assets will be visible albeit within a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.2.4.7 Effects will be less for sections of the coast path located inland due to screening by intervening wooded vegetation and buildings. A **minor to moderate** adverse and **not significant** effect is expected to arise in these sections.

1.2.5 People on the Millennium Way Path

1.2.5.1 The Applicant wishes to clarify that the minor adverse and not significant effects reported in APP-014 are confirmed as **negligible to minor** adverse and **not significant**. This is due to the limited visibility of the Morgan Generation Assets from this route located inland and with screening afforded by wooded vegetation and buildings.

1.2.6 Settlements of Douglas and Laxey (Representative Viewpoints 19 and 43) and Representative Viewpoint 49

1.2.6.1 The assessment recognises that the visual effects resulting from the Morgan Generation Assets will vary throughout the settlements of Douglas and Laxey. Visual effects will be greatest at the coast where the viewer currently experiences panoramic views of the Irish Sea, in particular at Douglas Promenade (Representative Viewpoint 49) and also at Old Laxey (Representative Viewpoint 43). From these locations, viewers will see the Morgan Generation Assets. These effects would be experienced in a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.2.6.2 In the wider built up areas of these settlements, the visibility of the Irish Sea and the potential for visual effects will generally be more restricted compared with the coastal locations discussed above due to the screening afforded by wooded vegetation and buildings.

1.2.6.3 The Applicant wishes to clarify that the moderate adverse and not significant effects reported in APP-014 are confirmed as **moderate** adverse and **significant** at the coast in these settlements where the viewer currently experiences panoramic views of the Irish Sea, in particular at Douglas Promenade (Representative Viewpoint 49) and also at Old Laxey (Representative Viewpoint 43). Additionally, **moderate** adverse and **significant** effects are expected to arise at representative viewpoint 19 Panoramic viewpoint at arch southwest of Douglas Head.

1.2.6.4 In the wider built up areas of these settlements, the visibility of the Irish Sea and the potential for visual effects will generally be more restricted compared with the coastal locations discussed above due to the screening afforded by wooded vegetation and buildings. **Minor to moderate** adverse and **not significant** visual effects, at most, will arise.

1.2.7 Summary

1.2.7.1 Summary tables reflecting the conclusions of this clarification note for the Morgan Generation Assets alone compared with those presented within the application are provided in Table 1.1 and Table 1.2 at the end of this note.

1.3 Cumulative effects resulting from Morgan Generation Assets

1.3.1.1 This section of this clarification note concerns the cumulative effects of the Morgan Generation Assets. It provides a response to ExA Question SLV 1.3 concerning the cumulative visual effects on people on the Raad ny Foillan Coast Path and at the settlements of Douglas and Laxey. It also provides clarification concerning cumulative effects on seascape character and on the landscape character of the Isle of Man.

1.3.1.2 The ExA Q concerning Cumulative Visual Effects: Raad ny Foillan Coast Path, Douglas and Laxey is as follows:

ES Volume 2, Chapter 10 [APP-014] paragraphs 10.9.4.58 to 10.9.4.59 and paragraphs 10.9.4.116 to 10.9.4.117 set out the significance of the cumulative visual effects during operation on users of the Raad ny Foillan Coast Path and individuals at the coastal settlements of Douglas and Laxey as moderate to major adverse and not significant. Paragraph 10.13.2.3, in summarising cumulative effects, notes "potential" significant cumulative effects. Table 10.24 sets out the cumulative effects on the Coast Path and Douglas/Laxey seafronts as moderate to major adverse (not significant). Whilst the ExA notes that GLVIA3 explains that there are 'no hard or fast rules about what effects should be deemed to be significant', it also notes that ES Volume 4, Annex 10.4 [APP037] section 1.4 sets out that Table 6 of the Guidance on the Assessment of the Impact of Offshore Wind Farms: Seascape and Visual Impact Report (Department of Trade and Industry, 2005) (DTI Guidance) is utilised in the SLVIA. The approach to moderate seascape and visual effects is explained in paragraph 1.4.1.6 of ES Volume 4, Annex 10.4 [APP-037], and whilst the Applicant recognises that Table 6 sets out moderate effects as "potentially significant", the ExA notes that major/moderate effects are identified as significant.

i) Could the Applicant clarify this inconsistency, and the meaning of 'potentially significant', having regard to the methodology used for the significance of effect.

ii) The Applicant is asked to review the significance of effects for each relevant receptor to ensure a consistent approach.

1.3.1.3 The Applicant notes that paragraph 10.9.4.58 of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014) sets out the significance of the cumulative visual effects during operation on users of the Raad ny Foillan Coast Path as moderate to major adverse and potentially significant (in relation to Scenario 3, Tier 1 – Existing, Consented and Submitted Offshore Wind Farms) (rather than 'not significant' as stated by the ExA question). This is also reflected in the summary table (Table 10.24) under the relevant 'Tier' heading.

1.3.1.4 In relation to question i), the term 'potentially significant' originates from the DTI Guidance. Paragraph 1.4.1.6 of Volume 4, Annex 10.4: Seascape, landscape and visual resources impact assessment methodology (APP-037) refers to Table 6 on page 80 of the DTI Guidance, where 'Major' and 'Major/Moderate' effects are identified as being significant, and a 'Moderate' effect is identified as either being potentially significant or not significant. The DTI report on page 80 explains that '*Where seascape or visual effect is [sic] classified as moderate, it is most likely that the effect will not be significant, but it is feasible that it could be judged as significant, depending on the particular circumstances arising*'.

1.3.1.5 The DTI Guidance also states on page 80 *'The matrix in Table 6 should not [be] used as a prescriptive tool, and the methodology and analysis of potential effects at any particular location must make allowance for the exercise of professional judgement.'* This approach accords with GLVIA 3 paragraph 3.33 which states, *'it is not necessary*

to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not, significant. The Technical Guidance Note LITGN-2024, August 2024 adds to this by stating *'However, typically, effects falling below the middle of the range of overall effect are assessed as not significant.'*

1.3.1.6 The moderate to major effects reported in the SLVIA were assessed as occurring within a range from 'moderate' (not significant or significant) to 'moderate to major' (significant). However, the Applicant also notes that, as set out above, regardless of any thresholds for levels of significance, clarity is needed on whether effects are, or are not, significant.

1.3.1.7 The following sections of this note provide a review and clarification of the cumulative effects of the Morgan Generation Assets including the cumulative visual effects on people on the Raad ny Foillan Coast Path and the settlements of Douglas and Laxey, in order to answer the ExA's question ii).

1.3.2 Cumulative effects assessment methodology

1.3.2.1 The cumulative effects assessment (CEA) methodology is set out in section 10.9 of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014) and is not repeated here. However, the Applicant wishes to highlight paragraph 10.9.1.22 of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014) in the context of this clarification note, which refers to guidance in GLVIA3 stating 'the cumulative assessment considers the additional impact and effect resulting from the introduction of Morgan Generation Assets (including Morgan Transmission Assets), in particular as follows:

- The 'filling' of an area with either the same or a different type of development, which may substantially alter the seascape, landscape resource, views or visual amenity; and
- Incremental change resulting from successive individual developments such that the combined seascape, landscape or visual effect is significant even though the individual effects may not be (GLVIA3, paragraph 7.17)'.

1.3.3 Seascape character area MCA 38 Irish Sea South – Clarification of cumulative effects (Scenario 2)

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Morecambe Generation Assets (Scenario 2)

1.3.3.1 The cumulative assessment considered the addition of the Morgan Generation Assets (including Morgan and Morecambe Offshore Wind farms: Transmission Assets) with the Morecambe Generation Assets in Scenario 2 in section 10.9.3 of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014). The cumulative effects during operations and maintenance are described in paragraph 10.9.3.3 for MCA 38 Irish Sea South. A significance of effect is outlined in paragraph 10.9.3.4 as moderate to major and potentially significant. The Applicant wishes to clarify that this cumulative effect is **moderate to major** adverse and **significant**. The Morgan Generation Assets will introduce wind turbines to the north western part of this MCA, in which the Morecambe Generation Assets wind turbines will be present within the south eastern part of the MCA. The Northwest England Cluster of offshore wind farms occupy the northern part of the MCA. The addition of the Morgan Generation Assets

alongside the Morecambe Generation Assets wind turbines and the existing wind turbines will result in cumulative direct and indirect effects over the MCA which are considered to be significant.

1.3.4 Seascape character area MCA 38 Irish Sea South – Clarification of cumulative effects (Scenario 3)

1.3.4.1 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms is outlined in paragraphs 10.9.4.19 and 10.9.4.20 in APP-014 for MCA 38. A minor to moderate adverse and not significant cumulative effect was concluded. The Applicant wishes to clarify the cumulative effects on MCA 38 as being **moderate** adverse and **not significant**. Although the cumulative ZTV reveals that the addition of the Morgan Generation Assets alongside the Northwest England Cluster of existing offshore wind farms will result in effects over the entire MCA, the additional wind turbines would not be substantially out of character with MCA 38.

1.3.4.2 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 existing, consented and submitted offshore wind farms is outlined in paragraphs 10.9.4.40 and 10.9.4.45 of APP-014 for MCA 38. A minor adverse and not significant cumulative effect was concluded. The Applicant wishes to clarify the cumulative effects on MCA 38 as being **minor to moderate** adverse and **not significant**. This reflects the addition of the Morgan Generation Assets alongside the Northwest England Cluster of existing offshore wind farms and the Mona Offshore Wind Project, located outside the southern boundary of the MCA.

1.3.4.3 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 and Tier 2 offshore wind farms is outlined in paragraphs 10.9.4.81 and 10.9.4.88 of APP-014 for MCA 38. A moderate to major and not significant cumulative effect was concluded. The Applicant wishes to clarify that the cumulative effect during operations and maintenance is **moderate to major** adverse and **significant**. The Morgan Generation Assets will occupy an area of sea in the northwestern part of the MCA and its addition alongside Tier 1 and Tier 2 offshore wind farms would intensify the extent of wind turbines present within the MCA that would influence seascape character of the MCA.

1.3.5 Seascape sensitivity zone SSZ 5 North Wales and Anglesey Outer Offshore – Clarification of cumulative effects (Scenario 3)

1.3.5.1 The cumulative assessment considered the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms on SSZ 5 North Wales and Anglesey Outer Offshore in paragraph 10.9.4.22 in Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014). A negligible to minor adverse and not significant cumulative effect was concluded. The Applicant wishes to clarify that a **small to medium** magnitude of cumulative impact will arise and the cumulative effect during operations and maintenance is **minor** adverse and **not significant**. The addition of the Morgan Generation Assets alongside the Northwest England Cluster of existing offshore wind farms would affect the eastern part of SSZ 5, these effects diminishing with distance.

1.3.5.2 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 existing, consented and submitted offshore wind farms is as outlined in paragraphs 10.9.4.41 and 10.9.4.46 of APP-014 for SSZ 5.

1.3.5.3 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 and Tier 2 offshore wind farms is as outlined in paragraphs 10.9.4.82 and 10.9.4.89 of APP-014 for SSZ 5.

1.3.6 Seascape character area MCA A Dreswick Point to Maughold Head – Clarification of cumulative effects (Scenario 3)

1.3.6.1 The cumulative assessment considered the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms on MCA A Dreswick Point to Maughold Head and these are as stated in paragraphs 10.9.4.21 in Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014).

1.3.6.2 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 existing, consented and submitted offshore wind farms is as outlined in paragraphs 10.9.4.43 and 10.9.4.47 of APP-014 for MCA A.

1.3.6.3 The cumulative effect resulting from the addition of the Morgan Generation Assets alongside Tier 1 and Tier 2 offshore wind farms is outlined in paragraphs 10.9.4.84 and 10.9.4.88 of APP-014 for MCA A and concludes a moderate adverse cumulative effect. The Applicant wishes to clarify that the cumulative effect during operations and maintenance is **moderate** adverse and **not significant** as per the original assessment paragraph 10.9.4.88 where the significance was omitted.

1.3.7 Isle of Man Landscape Character Types (LCT D Incised Inland Slopes, LCT E Rugged Coast and LCT H Coastal Cliffs)

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing offshore wind farms

1.3.7.1 The cumulative assessment considered the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms on the landscape character of the Isle of Man. It is noted that the cumulative ZTV for both the Morgan Array Area and the existing Robin Rigg offshore wind farm and the Morgan Array Area and the North Wales cluster of existing offshore wind farms reveals no cumulative effects on the Isle of Man within the SLVIA study area (Figures A.8 and A.9 of Appendix A of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014)). The cumulative assessment therefore focused on the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and both Robin Rigg and the North Wales cluster were not considered further in this assessment.

1.3.7.2 Analysis of the cumulative ZTV for the Morgan Generation Assets with the Northwest England cluster of existing offshore wind farms indicate that relatively higher levels of cumulative effect will arise to the character of LCT E Rugged Coast and relatively lower levels of cumulative effect will arise to the character of LCT D Incised Inland Slopes and LCT H Coastal Cliffs. This is consistent with the assessment of effects of the Morgan Generation Assets, for which, the Northwest England cluster of existing offshore wind farms is present in the baseline.

1.3.7.3 The addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms will increase the extent of wind farm development that would influence the character of LCT E Rugged Coast (of medium to high sensitivity). The Morgan Generation Assets will be closer to LCT E and will

exert a more prominent influence on LCT E than the Northwest England cluster of existing offshore wind farms. Considering the distance of c. 20 km at the closest point, a **small to medium** magnitude of impact is assessed in terms of incremental change resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster, leading to a **moderate** adverse and **significant** cumulative effect. These effects would be experienced in weather conditions that afford excellent visibility and, in a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.3.7.4 In regard to LCT D and H, cumulative effects will generally be more restricted compared with those for LCT E, as indicated in the cumulative ZTV and additionally due to screening by wooded vegetation and buildings. A **small** magnitude of impact will result in a **minor to moderate** adverse and **not significant** cumulative effect.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms

1.3.7.5 The cumulative assessment also considered the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and the submitted Mona Offshore Wind Project on landscape character of the Isle of Man. It is noted that the cumulative ZTV for the Morgan Array Area and the consented Awel y Mor offshore wind farm reveals no cumulative effects on the Isle of Man within the SLVIA study area (see Figure A10 of Appendix A of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014), and therefore the Awel y Mor offshore wind farm is not considered further in this assessment.

1.3.7.6 In regard to LCT E, which is of **medium to high** sensitivity, a **small to medium** magnitude of cumulative impact will arise due to the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and the Mona Offshore Wind Project, resulting in a **moderate** adverse and **significant** effect. The Mona Offshore Wind Project, at a distance of c. 45 km, will have very limited influence on the character of LCT E and therefore the cumulative effect will mainly result from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms.

1.3.7.7 Cumulative effects will be lower for LCT D Incised Inland Slopes and LCT H Coastal Cliffs. In the case of LCT D, this is due to the inland location and the screening afforded by wooded vegetation and buildings. In the case of LCT H, cumulative effects will be limited in the vicinity of Maughold Head. Cumulative effects will also affect a part of the coast south of Port St Mary according to cumulative ZTV data however these effects are expected to be very limited due mainly to the distance to the Mona Offshore Wind Project. A **small** magnitude of cumulative impact will arise on these **medium to high** sensitivity receptors resulting in **minor to moderate** adverse and **not significant** cumulative effects.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms and Tier 2 proposed offshore wind farms

1.3.7.8 The cumulative assessment also considered the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms, the submitted Mona Offshore Wind Project and Tier 2 Mooir Vannin offshore wind farm on landscape character of the Isle of Man. It is noted that the cumulative ZTV for the

Morgan Array Area and Tier 2 Morecambe Offshore Windfarm: Generation Assets reveals no cumulative effects on the Isle of Man within the SLVIA study area (see Figure A13 of Appendix A of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014), and therefore the Morecambe Offshore Windfarm: Generation Assets is not considered further in this assessment.

1.3.7.9 In regard to LCT E, the magnitude of impact due to the addition of the Morgan Generation Assets alongside Mooir Vannin offshore wind farm, the Northwest England cluster of existing offshore wind farms and the Mona Offshore Wind Project will vary along the length of this coastal landscape. Along the northeast coast of the island, the addition of the Morgan Generation Assets will result in lower levels of cumulative effect as the wind turbines will be less prominent, being behind Mooir Vannin and further away from the coast with the Northwest England cluster of existing offshore wind farms in the distance. Along the southeast coast, the addition of the Morgan Generation Assets will result in higher levels of cumulative effect on landscape character due to its presence close to but separate from Mooir Vannin with the Northwest England cluster of existing offshore wind farms in the distance. A **small to medium** magnitude of cumulative impact will arise on these **medium to high** sensitivity receptors resulting in **moderate** adverse and **not significant** cumulative effects.

1.3.7.10 Cumulative effects will be lower for LCT D Incised Inland Slopes and LCT H. In the case of LCT D this is due to the inland location and the screening afforded by wooded vegetation and buildings. In the case of LCT H Coastal Cliffs, cumulative effects will be limited to a part of this landscape in the vicinity of Maughold Head and a part of the coast south of Port St Mary. A **small** magnitude of cumulative impact will arise on these medium to high sensitivity receptors resulting in **minor to moderate** adverse and **not significant** cumulative effects.

1.3.8 Raad ny Foillan Coast Path - Clarification of cumulative effects (Scenario 3)

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing offshore wind farms

1.3.8.1 The cumulative assessment considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms on people on the Raad ny Foillan Coast Path. It is already noted above that the cumulative ZTV for the Morgan Generation Assets with Robin Rigg and the North Wales cluster reveals no cumulative effects on the Isle of Man within the SLVIA study area.

1.3.8.2 Analysis of the cumulative ZTV for the Morgan Generation Assets with the Northwest England cluster of existing offshore wind farms and the baseline conditions indicate that the cumulative effects will generally be higher along the more exposed sections of the coast path, closest to the Morgan Array Area, on the coastal edge from which panoramic views of the Irish Sea are available. These effects would be experienced along short sections of the coast path at Douglas Head (Representative Viewpoint 19), Douglas Promenade (Representative Viewpoint 49) and Old Laxey (Representative Viewpoint 43).

1.3.8.3 From these locations, viewers will see the Morgan Generation Assets in the foreground with the Northwest England cluster of existing turbines barely visible in the distance. The addition of the Morgan Generation Assets alongside the Northwest England

cluster of existing offshore wind farms will result in a **small to medium** magnitude of cumulative impact on these high sensitivity receptors resulting in a **moderate** adverse and **significant** cumulative effect. These effects would be experienced in weather conditions that afford excellent visibility and, in a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.3.8.4 Cumulative effects will generally be lower on sections of the coast path which are located inland, from which, views of the coast and the Irish Sea are more restricted due to the screening afforded by intervening vegetation and structures or on sections of the route where the focus of the view is on more localised coastal features. On these sections of the coast path, the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms will result in a **small** magnitude of cumulative impact on these high sensitivity receptors resulting in **minor to moderate** adverse and **not significant** cumulative effects. These effects would be experienced in weather conditions that afford excellent visibility.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms

1.3.8.5 The cumulative assessment also considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and the submitted Mona Offshore Wind Project on people on the Raad ny Foillan Coast Path. It is already noted above that the cumulative ZTV for the Morgan Generation Assets and the consented Awel y Mor offshore wind farm reveals no cumulative effects on the Isle of Man within the SLVIA study area.

1.3.8.6 In regard to people on exposed sections of the Raad ny Foillan Coast Path, closest to the Morgan Array Area, from which panoramic views of the Irish Sea are available, a **small to medium** magnitude of cumulative impact will arise due to the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and the Mona Offshore Wind Project resulting in a **moderate** adverse and **significant** effect. The Mona Offshore Wind Project, at a distance of c.47 km, will have very limited if any influence in views from the Raad ny Foillan Coast path and therefore the cumulative effect will mainly result from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms.

1.3.8.7 Cumulative effects will generally be lower on sections of the coast path which are located inland, from which, views of the coast and the Irish Sea are more restricted due to the screening afforded by intervening vegetation and structures or on sections of the route where the focus of the view is on more localised coastal features as referred to in paragraph 1.2.4.5 above. On these sections, cumulative effects will result from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms with limited influence, if any, from the Mona Offshore Wind Project. A **small** magnitude of cumulative impact will arise on these high sensitivity receptors resulting in **minor to moderate** adverse and **not significant** cumulative effects.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms and Tier 2 proposed offshore wind farms

1.3.8.8 The cumulative assessment also considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms, the submitted Mona Offshore Wind Project and Tier 2 Mooir Vannin offshore wind farm on people on the Raad ny Foillan Coast Path. It is already noted above that the cumulative ZTV for the Morgan Generation Assets and Tier 2 Morecambe Offshore Windfarm: Generation Assets reveals no cumulative effects on the Isle of Man within the SLVIA study area.

1.3.8.9 People on exposed sections of the Raad ny Foillan Coast Path from which panoramic views of the Irish Sea are available will see the addition of the Morgan Generation Assets alongside Mooir Vannin offshore wind farm, and the Northwest England cluster of existing offshore wind farms. The Mona Offshore Wind Project will be barely visible at all in the distance. The magnitude of impact due to the addition of the Morgan Generation Assets alongside these projects will vary along the length of the coast path due, in particular, to Mooir Vannin. At Maughold Head (Representative Viewpoint 42), the Morgan Generation Assets, at a distance of 28.5 km, will be seen behind Mooir Vannin which is closer to the viewer and more prominent. On the Langness Peninsula, the Morgan Generation Assets, at a distance of 28 km, will be seen on the horizon to the right of Mooir Vannin. At Douglas Promenade (Representative Viewpoint 49), the Morgan Generation Assets, at a distance of 24 km, will be seen on the horizon to the right of Mooir Vannin which is closer to the viewer and for which, the turbines will be more prominent. It is noted that part of the Mooir Vannin array will be hidden behind the headland near Onchan in the left part of the view. At Douglas Head (Representative Viewpoint 19), a greater extent of the Mooir Vannin wind turbines will be seen as more prominent features than the Morgan Generation Assets.

1.3.8.10 The cumulative effects will be greatest, albeit varying, along exposed sections of the Raad ny Foillan as outlined above. Overall, a **small to medium** magnitude of cumulative impact will arise at most on these high sensitivity receptors resulting in a **moderate** adverse and **not significant** cumulative effect in particular at exposed sections of the coast path further south such as at Douglas Head (Representative Viewpoint 19). Further north, the cumulative effects due to the addition of the Morgan Generation Assets will be less because the Mooir Vannin wind turbines will be more prominent than the Morgan Generation Assets, closer to the viewer such as at Maughold Head (Representative viewpoint 42).

Lower levels of cumulative effects will arise for viewers walking along inland, less exposed sections of the Raad ny Foillan. A **small** magnitude of cumulative impact will arise resulting in a **minor to moderate** and **not significant** effect.

1.3.9 Millennium Way – Clarification of cumulative effects (Scenario 3)

1.3.9.1 The assessment in APP-014 paragraph 10.8.5.12 refers to the limited visibility of the Morgan Generation Assets on its own from people on the Millennium Way due to screening by landform, vegetation and buildings. As views of Morgan Generation Assets will be limited, the extent of cumulative effects will also be limited. In this regard, the Applicant wishes to clarify that the addition of the Morgan Generation Assets would result in **negligible to minor** adverse and **not significant** cumulative effects for all Tiers (see Table 1.4).

1.3.10 Settlements of Douglas and Laxey

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing offshore wind farms

1.3.10.1 The cumulative assessment also considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms on people at the settlements of Douglas and Laxey. It is already noted above that the cumulative ZTV for the Morgan Generation Assets with Robin Rigg and the North Wales cluster reveals no cumulative effects on the Isle of Man within the SLVIA study area.

1.3.10.2 The assessment recognises that the cumulative effects resulting from the addition of the Morgan Generation Assets with the Northwest England cluster of existing offshore wind farms will vary throughout the settlements of Douglas and Laxey. Cumulative visual effects will be greatest at the coast where the viewer currently experiences panoramic views of the Irish Sea, in particular at Douglas Promenade (Representative Viewpoint 49) and also at Old Laxey (Representative Viewpoint 43). From these locations, viewers will see the Morgan Generation Assets, closer to the viewer, than the Northwest England cluster of existing turbines which would be barely visible in the distance. The addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms will result in a **small to medium** magnitude of cumulative impact on these high sensitivity receptors resulting in a **moderate** adverse and **significant** cumulative effect in particular at Douglas Promenade. These effects would be experienced in weather conditions that afford excellent visibility and, in a seascape animated by commercial shipping, mainland ferries, fishing vessels and recreational sailing.

1.3.10.3 In the wider built up areas of these settlements, the visibility of the Irish Sea and the potential for cumulative effects will generally be more restricted compared with the coastal locations discussed above due to the screening afforded by wooded vegetation and buildings. Although there is potential for **minor to moderate** adverse and **not significant** cumulative effects to arise in some locations, there will be other locations where the level of effect will be lower.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms

1.3.10.4 The cumulative assessment also considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms and the submitted Mona Offshore Wind Project on people at the settlements of Douglas and Laxey. It is already noted above that the cumulative ZTV for Morgan Generation Assets and the consented Awel y Mor offshore wind farm reveals no cumulative effects on the Isle of Man within the SLVIA study area

1.3.10.5 People at the coast at Douglas Promenade (Representative Viewpoint 49) and at Old Laxey (Representative Viewpoint 43) will see the Morgan Generation Assets in the foreground with the Northwest England cluster of existing turbines in the distance. The Mona Offshore Wind Project turbines will be scarcely visible. The cumulative effect will result mainly from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms. A **small to medium** magnitude of cumulative impact on these high sensitivity receptors will result in a

moderate adverse and **significant** cumulative effect. Further inland within the wider built up areas in these settlements, the cumulative visual effects would be **minor to moderate** adverse at most and **not significant**.

Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms and Tier 2 proposed offshore wind farms

1.3.10.6 The cumulative assessment also considered the cumulative visual effects resulting from the addition of the Morgan Generation Assets alongside the Northwest England cluster of existing offshore wind farms, the submitted Mona Offshore Wind Project and Tier 2 Mooir Vannin offshore wind farm on people at the settlements of Douglas and Laxey. It is already noted above that the cumulative ZTV for the Morgan Generation Assets and Tier 2 Morecambe Offshore Windfarm: Generation Assets reveals no cumulative effects on the Isle of Man within the SLVIA study area.

1.3.10.7 At Douglas and Laxey, the potential for significant cumulative visual effects will be restricted to locations at the coastal edge at Douglas Promenade (Representative Viewpoint 49) and at Old Laxey (Representative Viewpoint 43). At each location, the Morgan Generation Assets will be less prominent in views compared with Mooir Vannin but will, to some extent, extend and intensify the extent of wind farm development seen from these locations. Considering the addition of the Morgan Generation Assets alongside Mooir Vannin and Tier 1 offshore wind farms, a **small to medium** magnitude of cumulative impact is considered to arise to viewers of **high** sensitivity resulting in a **moderate** adverse and **not significant** effect. The Morgan Generation Assets wind turbines will be less prominent than the Mooir Vannin wind turbines, located closer to the viewer.

1.3.10.8 In the wider built up areas of these settlements, the visibility of the Irish Sea and the potential for cumulative effects will generally be more restricted compared with the coastal locations discussed above due to the screening afforded by wooded vegetation and buildings. Cumulative effects would be **negligible to minor** adverse and **not significant** at most.

1.4 Response to ExA Q SLV 1.5

1.4.1.1 The ExA Q is as follows:

Visual effects on people using the main ferry routes

A "moderate to major" adverse effect during operation is identified in ES Volume 2, Chapter 10 [APP-014] for visual effects on people using the main ferry routes, but it is unclear in paragraph 10.13.1.4 and Table 10.23 whether this effect is assessed as significant.

Paragraph 10.5.2.7 notes that 'For the purposes of this assessment, any effects with a significance level of substantial or major have been deemed significant in terms of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017' and 'An accumulation of individual moderate effects, for instance those experienced during a journey undertaken by the same visual receptor, may also be judged as significant in some circumstances'.

Table 10.24, in summarising potential cumulative effects, sets out operational visual effects on the main ferry routes as "minor to moderate adverse" (scenario 2) and "moderate adverse" (scenario 3), both classified as not significant.

The Applicant is asked to:

i) Provide an overall summary of significance of the effect for people using main ferry routes, including at viewpoints 22 and 23.

ii) Explain why the cumulative effect is summarised as a lesser effect during operation than the project alone.

1.4.1.2 The Applicant's response to question i) is as follows.

1.4.1.3 The assessment for the Morgan Generation Assets project alone (paragraph 10.8.11.17) concludes that moderate to major adverse visual effects will arise to people onboard the ferries travelling adjacent to the Morgan Array Area. The assessment states that *'These visual effects could be considered to be significant in close proximity to the Morgan Generation Assets wind turbines. At other points along the route, further away from the Morgan Array Area, the effects would diminish with increasing distance to the wind turbines and would not be significant.'* The Applicant confirms that a **large** magnitude of impact will arise resulting in **moderate to major** adverse and **significant** effects on people onboard ferries in close proximity to the Morgan Generation Assets. These effects will diminish, eventually becoming not significant, with increasing distance from the Morgan Generation Assets.

1.4.1.4 In relation to viewpoints 22 and 23, the Applicant highlights the following as presented in the application:

- At viewpoint 22, the SLVIA (APP-014) states in paragraph 10.8.13.109 'Overall, the magnitude of visual impact caused by Morgan Generation Assets during operations and maintenance, experienced by ferry passengers in transit at this location, approximately 19.1 km from the closest turbine, is deemed to be small to medium. The sensitivity of the receptor is medium. The effect will be minor to moderate adverse and not significant.'
- At viewpoint 23, the SLVIA (APP-014) states in paragraph 10.8.13.121 'Overall, the magnitude of visual impact caused by Morgan Generation Assets during operations and maintenance, experienced by ferry passengers in transit at this location, approximately 14.1 km from the closest turbine, is deemed to be medium. The sensitivity of the receptor is medium. The effect will be moderate adverse and not significant.'

1.4.1.5 The assessment recognises that the visual effect of the Morgan Generation Assets will vary for people onboard ferries. This is due to the dynamic nature of the viewer, being onboard a vessel travelling between Heysham and Douglas or Liverpool and Douglas for whom, the size and scale of the wind turbines will vary, with effects diminishing with increasing distance to the Morgan Array Area. Considering each of the ferry routes as a whole, the Morgan Generation Assets will result in a magnitude of impact ranging from **negligible**, at long distance to the Morgan Array Area, to **large** in close proximity to the Morgan Generation Assets. Overall, a **small to medium** magnitude of impact is considered to arise for the ferry routes as a whole resulting in a **minor to moderate** and **not significant** effect.

1.4.1.6 The Applicant response to question ii) is as follows.

1.4.1.7 In relation to Table 10.24, the Applicant wishes to highlight that the conclusions stated by the ExA were not made in relation to Scenario 2, and sets out below the conclusions as presented in the application:

- Scenario 3: Tier 1 – Existing Offshore Wind Farms: minor to moderate adverse (not significant)

- Scenario 3: Tier 1 – Existing, Consented and Submitted Offshore Wind Farms: minor to moderate adverse (not significant)
- Scenario 3: Tier 2 – Proposed Offshore Wind Farms: moderate adverse (not significant).

1.4.1.8 Paragraph 10.9.1.22 of Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014) outlines the approach to the cumulative assessment stating that the cumulative assessment considers the additional impact resulting from the introduction of the Morgan Generation Assets alongside other projects included in the cumulative assessment. This accords with NatureScot (2021) guidance which states *'The magnitude of cumulative change may be different from the magnitude of change brought about by the development when considered on its own. The aim of the cumulative assessment is to identify the magnitude of additional cumulative change which would be brought about by the proposed development when considered in conjunction with other wind farms.'*

1.4.1.9 The cumulative visual effects on people using the main ferry routes is outlined in Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014) in relation to Scenario 3. This considered the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms. The assessment then considered the addition of the Morgan Generation Assets alongside Tier 1 existing, consented and submitted offshore wind farms. Finally the addition of the Morgan Generation Assets alongside Tier 1 and Tier 2 offshore wind farms was assessed.

1.4.1.10 The Applicant wishes to clarify the cumulative effects on people on ferry routes in the following sections.

1.4.2 Clarification of cumulative effects – Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing offshore wind farms

1.4.2.1 In regard to cumulative visual effects on people using the main ferry routes, the Morgan Generation Assets will introduce additional wind turbines to the existing wind turbines (Northwest England Cluster and North Wales Cluster) which are visible along these ferry routes. The magnitude of additional cumulative impact and significance of effect is stated in paragraphs 10.9.4.33 and 10.9.4.34 as follows, albeit noting that the ferries will travel past and not through the Morgan Array Area:

- Paragraph 10.9.4.33 states '*A medium magnitude of cumulative visual impact is assessed to arise to people onboard these ferry routes (of medium sensitivity) where these are passing through or immediately adjacent to the Morgan Generation Assets array area resulting in moderate adverse cumulative visual effects. This arises as a result of existing offshore wind farms in the Northwest England cluster which are clearly visible at relatively short range on a continuous basis from a section of the Heysham to Douglas Ferry Route, in particular, along with the array area for Morgan Generation Assets*.'
- Paragraph 10.9.4.34 states '*This cumulative magnitude of visual impact will diminish with increasing distance from Morgan Generation Assets. Overall, a small to medium magnitude of cumulative impact will arise to users of these ferry routes of medium sensitivity resulting in an overall minor to moderate adverse and not significant cumulative visual effect*.'

1.4.2.2 The Applicant clarifies that a **large** magnitude of cumulative visual impact will arise close to the Morgan Generation Assets resulting in a **moderate to major** adverse and

significant cumulative visual effect. Considering the ferry routes as a whole, a **small to medium** magnitude of impact will arise resulting in a **minor to moderate** and **not significant** cumulative effect. This reflects the visual effect of the Morgan Generation Assets alongside the Tier 1 existing offshore wind farms.

1.4.3 Clarification of cumulative effects – Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms

1.4.3.1 The cumulative assessment also considered the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms (Northwest England Cluster and North Wales Cluster), the consented Awel y Mor and the submitted Mona Offshore Wind Project. A **small to medium** magnitude of cumulative impact is considered to arise to the ferry routes as a whole resulting in a **minor to moderate** adverse and **not significant** effect. These cumulative effects will be largely attributed to the addition of the Morgan Generation Assets alongside the existing Northwest England cluster and the Mona Offshore Wind Project.

1.4.4 Clarification of cumulative effects – Morgan Generation Assets (including Morgan and Morecambe Offshore Wind Farms: Transmission Assets) and Tier 1 existing, consented and submitted offshore wind farms and Tier 2 proposed offshore wind farms

1.4.4.1 The cumulative assessment also considered the addition of the Morgan Generation Assets alongside Tier 1 existing offshore wind farms, the consented Awel y Mor and the submitted Mona Offshore Wind Project and Tier 2 proposed offshore wind farms. The assessment concluded a medium magnitude of cumulative impact for the ferry routes as a whole resulting in a moderate and not significant effect (paragraphs 10.9.4.112 and 10.9.4.119) as reported in Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014). The Applicant wishes to clarify these effects as follows.

1.4.4.2 The scale of the addition of the Morgan Generation Assets will seem relatively small against all of these other wind farms however its presence along with these other offshore wind farms will intensify the extent of wind turbines visible from these ferry routes. For viewers on the Douglas to Heysham Route, the addition of the Morgan Generation Assets will mean that these viewers will see wind turbines on both sides of the route for most of the journey. People on the Douglas to Liverpool Route will be affected in this way to a lesser extent. A **medium** magnitude of impact will arise to people on these ferry routes as a whole, resulting in a **moderate** and **not significant** effect.

1.4.5 Summary

1.4.5.1 Summary tables reflecting the significance of cumulative effects presented within this clarification note compared with those presented within the application are provided in Table 1.3 and Table 1.4 below.

Table 1.1: Summary of effects on landscape and seascape receptors during operations and maintenance as presented within the application compared with those presented in this clarification note.

Receptor	Sensitivity (application)	Sensitivity (clarification)	Magnitude (application)	Magnitude (clarification)	Significance of effect (application)	Significance of effect (clarification)
MCA 38 Irish Sea South	Low to medium	**Low to medium**	Large close to the Morgan Array Area	**Large close to the Morgan Array Area**	-	**Moderate to major adverse and significant**
			Medium to large for the MCA as a whole (paragraph 10.8.2.19)	**Medium for the MCA as a whole**	Moderate to major adverse and not significant (paragraph 10.8.2.22)	**Moderate adverse and not significant**
SSZ 5 North Wales and Anglesey Outer Offshore	Low to medium	**Low to medium**	Small to Medium (paragraph 10.8.2.20)	**Small to medium**	Minor adverse and not significant (paragraph 10.8.2.24)	**Minor adverse and not significant**
MCA A Dreswick Point to Maughold Head	Low to medium	**Low to medium**	Medium (paragraph 10.8.2.20)	**Medium**	Minor to moderate adverse and not significant (paragraph 10.8.2.23)	**Minor to moderate adverse and not significant**
Isle of Man LCT E Rugged Coast, LCT D Incised Inland Slopes and LCT H Coastal Cliffs.	Medium to high	**Medium to high**	Small (paragraph 10.8.3.17 to 10.8.3.19)	**Small to medium for LCT E**	Minor to moderate adverse and not significant (paragraph 10.8.3.21)	**Moderate adverse and significant for LCT E**
				Small for LCT D and LCT H		**Minor to moderate adverse and not significant for LCT D and LCT H**

Table 1.2: Summary of effects on visual receptors during operations and maintenance as presented within the application compared with those presented in this clarification note.

Receptor	Sensitivity (application)	Sensitivity (clarification)	Magnitude (application)	Magnitude (clarification)	Significance of effect (application)	Significance of effect (clarification)
People on the Raad ny Foillan Coast Path	High	**High**	Small to medium (paragraph10.8.5.22)	**Small to medium at the coast**	Moderate adverse and not significant (paragraph 10.8.5.24)	**Moderate adverse and significant at the coast**
				Small inland		**Minor to moderate adverse and not significant inland**
People on Millennium Way Path	High	**High**	Small (paragraph10.8.5.22)	**Negligible**	Minor adverse and not significant (paragraph 10.8.5.25)	**Negligible to minor adverse and not significant**
People at the settlements of Douglas and Laxey	High	**High**	Small to medium (paragraph 10.8.8.14)	**Small to medium at the coast**	Moderate adverse and not significant (paragraph 10.8.8.16)	**Moderate adverse and significant at the coast**
				Small within built up areas inland		**Minor to moderate adverse and not significant inland**
People onboard Ferries ((Liverpool Douglas and Heysham Douglas)	Medium	**Medium**	Medium to Large passing through or adjacent to Morgan Array Area (paragraph 10.8.11.15)	**Large close to the Morgan Array Area**	Moderate to major adverse. These effects could be considered to be significant in close proximity to the Morgan Generation Assets (paragraph 10.8.11.17).	**Moderate to major adverse and significant effects**
				Small to medium (for the ferry routes as a whole)		**Minor to moderate adverse and not significant effects**

Table 1.3: Summary of cumulative effects on landscape and seascape receptors during operations and maintenance as presented within the application compared with those presented in this clarification note (Scenario 3).

Receptor	Magnitude Tier 1 existing projects (application)	Magnitude Tier 1 existing projects (clarification)	Cumulative effect Tier 1 existing projects (application)	Cumulative effect Tier 1 existing projects (clarification)	Magnitude All Tier 1 projects (application)	Magnitude All Tier 1 projects (clarification)	Cumulative effect All Tier 1 projects (application)	Cumulative effect All Tier 1 projects (clarification)	Magnitude Tier 1 & 2 projects (application)	Magnitude Tier 1 & 2 projects (clarification)	Cumulative effect Tier 1 & 2 projects (application)	Cumulative effect Tier 1 & 2 projects (clarification)
MCA 38 Irish Sea South	Medium (paragraph 10.9.4.20)	**Medium**	Minor to moderate adverse and not significant (paragraph 10.9.4.20)	**Moderate adverse and not significant**	Small to Medium (paragraph 10.9.4.40)	**Small to medium**	Minor adverse and not significant (paragraph 10.9.4.45)	**Minor to moderate adverse and not significant**	Medium to Large (paragraph 10.9.4.81)	**Medium to Large**	Moderate to Major adverse and not significant (paragraph 10.9.4.88)	**Moderate to major adverse and significant**
SSZ 5 North Wales and Anglesey Outer Offshore	Negligible to Small (paragraph 10.9.4.22)	**Small to medium**	Negligible to minor adverse and not significant (paragraph 10.9.4.22)	**Minor adverse and not significant**	Negligible (paragraph 10.9.4.41)	**Negligible**	Negligible to minor adverse and not significant (paragraph 10.9.4.46)	**Negligible to minor adverse and not significant**	Small (paragraph 10.9.4.82)	**Small**	Minor adverse and not significant (paragraph 10.9.4.89)	**Minor adverse and not significant**
MCA A Dreswick Point to Maughold Head	Medium (paragraph 10.9.4.21)	**Medium**	Minor to moderate adverse and not significant (paragraph 10.9.4.21)	**Minor to moderate adverse and not significant**	Medium (paragraph 10.9.4.43)	**Medium**	Minor to moderate adverse and not significant (paragraph 10.9.4.47)	**Minor to moderate adverse and not significant**	Medium (paragraph 10.9.4.84)	**Medium**	Moderate (paragraph 10.9.4.88)	**Moderate adverse and not significant**
Isle of Man LCT E Rugged Coast, LCT D Incised Inland Slopes and LCT H Coastal Cliffs.	Medium (paragraph 10.9.4.12)	**Small to Medium for LCT E** **Small for LCT D and LCT H**	Moderate to major adverse and not significant (paragraph 10.9.4.12)	**Moderate adverse and significant at the coast** **Minor to moderate adverse and not significant inland**	Medium (paragraph 10.9.4.43)	**Small to Medium for LCT E** **Small for LCT D and LCT H**	Moderate to major adverse and potentially significant (paragraph 10.9.4.48)	**Moderate adverse and significant at the coast** **Minor to moderate adverse and not significant inland**	Small (paragraph 10.9.4.76)	**Small to medium** **Small**	Minor to moderate adverse and not significant (paragraph 10.9.4.87)	**Moderate adverse and not significant** **Minor to moderate adverse and not significant**

Table 1.4: Summary of cumulative effects on visual receptors during operations and maintenance as presented within the application compared with those presented in this clarification note (Scenario 3).

Receptor	Magnitude Tier 1 existing projects (application)	Magnitude Tier 1 existing projects (clarification)	Cumulative Effect Tier 1 existing projects (application)	Cumulative Effect Tier 1 existing projects (clarification)	Magnitude All Tier 1 projects (application)	Magnitude All Tier 1 projects (clarification)	Cumulative Effect All Tier 1 projects (application)	Cumulative Effect All Tier 1 projects (clarification)	Magnitude Tier 1 & 2 projects (application)	Magnitude Tier 1 & 2 projects (clarification)	Cumulative Effect Tier 1 & 2 projects (application)	Cumulative Effect Tier 1 & 2 projects (clarification)
People on the Raad ny Foillan Coast Path	Medium (paragraph 10.9.4.29)	**Small to medium at the coast**	Moderate to major adverse and not significant (paragraph 10.9.4.29)	**Moderate adverse and significant at the coast**	Medium (paragraph 10.9.4.53)	**Small to medium at the coast**	Moderate to Major Adverse and potentially significant (paragraph 10.9.4.58)	**Moderate adverse and significant at the coast**	Medium (paragraph 10.9.4.108)	**Small to medium**	Moderate to major and not significant (10.9.4.116)	**Moderate adverse and not significant**
		Small inland		**Minor to moderate adverse and not significant inland**		**Small inland**		**Minor to moderate adverse and not significant inland**		**Small**		**Minor to moderate adverse and not significant effect**
People on Millennium Way Path	Negligible to Small (paragraph 10.9.4.30)	**Negligible**	Minor adverse and not significant (paragraph 10.9.4.30)	**Negligible to minor adverse and not significant**	Small (paragraph 10.9.4.53)	**Negligible**	Minor to Moderate Adverse and not significant (paragraph 10.9.4.60)	**Negligible to minor adverse and not significant**	Negligible to small (paragraph 10.9.4.109)	**Negligible**	Minor and not significant (10.9.4.118)	**Negligible to minor adverse and not significant**
People at the settlements of Douglas and Laxey	Medium (paragraph 10.9.4.31)	**Small to medium at the coast**	Moderate to major adverse and not significant (paragraph 10.9.4.31)	**Moderate adverse and significant at the coast**	Medium (paragraph 10.9.4.54)	**Small to medium at the coast**	Moderate to Major Adverse and not significant (paragraph 10.9.4.59)	**Moderate adverse and significant at the coast**	Medium (paragraph 10.9.4.110)	**Small to medium**	Moderate to major and not significant (10.9.4.116 and 10.9.4.117)	**Moderate adverse and not significant**
		Small within built up areas		**Minor to moderate adverse and not significant inland**		**Small within built up areas**		**Minor to moderate adverse and not significant inland**		**Negligible**		**Negligible to minor adverse and not significant**
People onboard Ferries ((Liverpool Douglas and Heysham Douglas)	Medium - close to Morgan (paragraph 10.9.4.33) Overall Small to medium (paragraph 10.9.4.34)	**Small to medium (for the ferry routes as a whole)**	Moderate adverse close to the Morgan Array Area (paragraph 10.9.4.33) Overall minor to moderate adverse and not significant (paragraph 10.9.4.34)	**Minor to moderate adverse and not significant**	Small to medium across the entire ferry route (paragraph 10.9.4.55)	**Small to medium (for the ferry routes as a whole)**	Minor to Moderate Adverse and not significant (paragraph 10.9.4.61)	**Minor to moderate adverse and not significant**	Overall Medium (paragraph 10.9.4.112)	**Medium**	Moderate and not significant (10.9.4.119)	**Moderate adverse and not significant**