

Raywood, Simon

From: Robert Hunter | Isle of Man Steam Packet Company [REDACTED]
Sent: 13 January 2025 16:23
To: Morgan Offshore Wind Project
Subject: RE: Morgan Offshore Wind Project: Generation Assets - Examining Authority's Second Written Questions

Dear Mr Raywood,

Thank you for your below email and opportunity to respond to the Examining Authority's consultation.

Please see below Isle of Man Steam packet's response to Morgan Planning Inspectorate Questions 2.10 and 2.11.

SN 2.10 Assessment of effects of deviation of ferry routes

The IoMSPC is invited to respond by D5 to the Applicant's responses [REP4-007, pages 43 to 50] to the IoMSPC's D3 answers to ExQ1, including the Applicant's contention that the analysis of environmental effects on ferry services presented by the IoMSPC is precautionary because some parameters seem to have been overstated, including fuel cost and amount of sailings that would be adverse weather routed, needing further justification. The ExA notes from this submission that the Applicant "is engaging with the IoMSPC to resolve residual commercial effects in parallel to the Examination".

The IoMSPC believes the stated service disruption and adverse environmental effects is a reasonable and accepts figures may be subject to seasonal variation primarily based on the sea and weather conditions affecting the available sea room to navigate. However, it is well recognised that with worldwide climatic changes resulting in extreme weather conditions are becoming more frequent and as such it can be expected that in future, the disruption will likely also be more frequent. The environmental impacts is the result of increased fuel consumption and CO2 emission output as a direct result of increased distance because of route deviations required. IoMSPC is currently engaging with the developers as noted on the Statement of Common Ground addressing adverse operational costs likely to be incurred as a direct result of deviating from existing routes.

Rep3-034-1 Manxman's average consumption on passage to Heysham is 6.9MT MGO, each way which compares to Ben my Chree having an average consumption of 4.86MT MGO each way. Thus it is important to recognise Manxman consumes more fuel than Ben my Chree being a larger ship. Whilst Manxman is a newer and more fuel efficient ship than Ben my Chree, Manxman is a much larger ship than Ben my Chree with higher power demands and a higher block coefficient when making way through the water.

Further revision of passage planning has been undertaken and will continue to be revised as the cumulative projects evolve. Passage Planning can vary according to vessel type and is frequently amended en route under the authority of Master according to the prevailing circumstances and conditions such as weather, traffic congestion and application of the Merchant Shipping Regulations Prevention of Collision at Sea (COLREGS) and any new navigation warnings. It is unreasonable to assume the passage distance will be the same for every crossing. Any increase in mileage no matter how small per trip cumulatively builds and all contributes to increased fuel consumption and emission output. In a typical year approximately 1300 crossings can be made. If sailing the extra 1nm per trip route option this would correspond to an extra 1300nm worth of fuel consumption and emission output for the shorter route (North of Morgan) route option alone.

Rep3-034-2 The £795/tonne cost stated was correct when initial investigations were conducted and was used as an average figure in a fluctuating market into the cost impact of route distance increases over a year. The IoMSPC recognises the fuel oil cost per tonne has fallen since initial cost estimations were made and is currently (January 2025) paying approximately £620/tonne for Marine Gas oil. This is indicative of how the cost per tonne can fluctuate significantly subject to market sales price where it must be noted the cost per tonne trend is now currently rising. It is conceivable in future that fuel oil costs may go higher than the £795/tonne stated cost.

Rep3-034-3 Please note that while Manannan's crossings between Douglas and Heysham are few in comparison to conventional ferry crossings per year. Manannan is a High Speed Craft where fuel consumption is considerably higher than a conventional ferry. Manannan can also serve on occasion as back up capacity in the event of a cancellation (eg a technical cancellation) of another ferry so may sail more throughout the year than stated.

Rep3-034-4 Whilst a single vessel transiting the Morgan / Mooir Vannin bottleneck area in isolation may be tolerable, due consideration must also be given to multiple vessels of varying size and type safely passing one another while complying the Merchant Shipping Regulations Prevention of Collision at Sea (COLREGS) particularly in poor weather and reduced visibility conditions. Any significant alteration to speed to comply with the COLREGS will adversely affect the scheduling and introduce further potential of missing tide window or berth slot at the destination port.

Rep3-034-5 The IoMSPC maintains according to reasonably foreseeable conditions according to the latest project area the passage between Douglas Heysham Routes will be an extra 1nm and 3 minutes extra for the shorter route option north of Morgan and an extra 5nm and 17 minutes for the longer route option south of Morgan for conventional ferries. An extra 17 minutes each way for a return crossing amounts to an extra 68 minutes per 24 hours, accounting for two return trips per day, to be accounted for in the vessel scheduling meaning the vessel will be forced to operate a delayed service until the time can be made up. This in turn will further inconvenience passenger and freight customers and the vessel operating at higher speeds further increasing fuel consumption and emission output.

The IoMSPC notes the number of named storm conditions is rising but recognises the 5% longer route is an estimate where some years will be less and some years will be more. It should also be noted that following storm conditions adverse swell waves may continue for a short period of time after the wind waves have subsided. The Master must factor in all aspects concerning the prevailing sea and tidal conditions and the potential adverse effects to safe motion of the vessel in a sea way when deciding on the choice of route for the intended crossing.

Rep3-034-6 Disruption to passenger and freight services whether delayed or cancelled will incur tangible and intangible costs which must be recognised. The tangible cost of increased fuel oil, lubrication oil consumption and increased CO2 emissions can be measured as a result of increased distance sailed. The intangible cost of reputation damage as a result of delays or cancellations may be realised by persistent negative media and public reporting where ferry disruption is national news on the Isle of Man. The outcome of perceived lack of confidence in service reliability lead to a fall in passenger numbers to air travel or a reduction in freight to other freight operators that serve the Isle of Man.

The possibility of cancellations due to the presence of windfarm sites is increased in some circumstances where the ship's Master determines the vessel's motion on a northerly or southerly route option is likely to be too uncomfortable for passengers and dangerous to freight where the ship is confined to navigate on particular headings at times through windfarm corridors. The IoMSPC opines that were there is a borderline cancellation decision to be made by the ship's Master, this decision will likely be to cancel due to the lack of available sea room as a result of cumulative windfarm sites. Additionally, the absence of innovative safety features, such as crash barriers (<https://www.marin.nl/en/news/crash-barriers>), further raises the level of risk beyond acceptable thresholds. This presence of an array compromise the vessel's ability to safely implement contingencies, such as managing a blackout, within these restricted navigational spaces.

SN 2.11 Mitigation for adverse commercial and carbon emissions effects of ferry deviations

The IoMSPC and Stena Line are each asked to advise:

- i) What mitigation it is seeking for adverse commercial and carbon emissions effects resulting from the need for deviated passages of its ferry services.

IoMSPC is currently in the process of negotiating a ferry mitigation agreement concerning Increased operational costs associated with increased oil consumption and the UK Emissions Trading Scheme (UK ETS) resulting from increased emissions associated with route diversions, as well as loss of income and reputational damage

associated with increased cancellations of lifeline ferry services as a result of route deviations and restricted weather routing options.

ii) How would any such mitigation be allocated among the cumulative projects creating the need for deviation.

A Ferry Mitigation Agreement for the Morgan project is currently being negotiated on an individual project basis with the project developers. The terms of the agreement has not been finalised. The status of this on an individual and cumulative basis has been included on the Statement of Common Ground submitted.

iii) How should any such mitigation be secured via a DCO, if made.

As per the Statement of Common Ground the IoMSPC is currently negotiating a Ferry Mitigation Agreement to address adverse operational costs (including increased fuel consumption and increased carbon emissions as a result of ferry deviations).

Kind regards,
Robert Hunter



Robert Hunter

Marine Manager, DPA, CSO

Isle of Man Steam Packet Company Limited, Imperial Buildings, Douglas, Isle of Man, IM1 2BY

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From: Morgan Offshore Wind Project <MorganOffshoreWindProject@planninginspectorate.gov.uk>
Sent: 19 December 2024 15:05
To: Morgan Offshore Wind Project <MorganOffshoreWindProject@planninginspectorate.gov.uk>
Subject: Morgan Offshore Wind Project: Generation Assets - Examining Authority's Second Written Questions

Dear Sir/Madam,

I hope this email finds you well.

I am sending this email as a courtesy email following the issuing in line with the examination timetable for Morgan Offshore Wind Project: Generation Assets, of the Examining Authority's Second Written Questions (ExQ2). You are part of or represent organisations to whom the Examining Authority have directed questions by name. The Examining Authority's Second Written Questions (ExQ2) are available on the project page of the National Infrastructure at <https://infrastructure.planninginspectorate.gov.uk/document/EN010136-000667> and I attach a word version of the ExQ2 document. The Deadline for responses is currently Deadline 5 which falls on 16 January 2025. This deadline closes at 23:59 on 16 January 2025.

You may also wish to review the recordings, transcripts and action points from Issue Specific Hearing 2 on Environmental Matters and Other Sea Users held on Tuesday 26 and Wednesday 27 November 2024, to ensure you are aware of questions, action points and points raised that you may wish to respond to if you have not already done so.

I would also like to take this opportunity to wish you, a Merry Christmas, and a Happy New Year.

Kind regards,

Simon



Simon Raywood
Case Manager – National Infrastructure
The Planning Inspectorate

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