



Maritime &
Coastguard
Agency

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15 January 2025

Your ref: EN010136
IP No.: 20048863

Dear Sir/Madam

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

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

Examination Timetable – Deadline 5

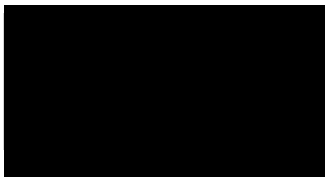
Thank you for inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Examining Authority as part of its assessment of the proposed generation assets for the Morgan offshore wind farm project. We would like to submit the following response to the second written questions (ExQ2).

Written Questions (ExQ2)

Question and reference	MCA Response
<p>GEN 2.5 Outline Environmental Management Plan The Maritime and Coastguard Agency (MCA) and Marine Management Organisation (MMO) are area asked to confirm satisfaction with the Outline Environmental Management Plan (EMP) [REP4-018], or if not satisfied, provide comments clarifying why not. This should be included in the respective Statements of Common Ground (SoCG).</p>	<p>MCA is satisfied the OEMP contains an outline Marine Pollution Contingency Plan to clarify response procedures in the event of a pollution incident caused by the development, support vessels, or a third-party that impacts on the development. The draft MPCP will be reviewed by MCA post consent.</p>
<p>AR 2.4 Very High Frequency (VHF) Communications The Applicant and BAe notified the ExA at ISH2 that the matter of potential effects to VHF communications was a newly emerging issue since production of the ES, which has arisen from recent CAA advice relating to onshore wind farms. ... The MCA is asked to: v) Clarify if the VHF matter arising from recent CAA advice is an issue for search and rescue operations and confirm this within the final version of your SoCG.</p>	<p>v) Offshore wind farms can potentially affect shore-based VHF radio coverage and developers are required to discuss with the MCA during the post-consent/pre-construction stage the need for providing in-field, marine band VHF radio communications aerial(s) (VHF voice with Digital Selective Calling) that can cover the entire wind farm site and its surrounding area. Further information and guidance can be found in MGN654 Annex 5 section 6.1.</p>
<p>SN 2.1 Guidance on navigational route width in IoM territorial waters The IoM Harbours Division (through the IoM Government TSC), the MCA and the UK Chamber of Shipping are invited to advise on any or all of the following: i) Whether the World Association for Waterborne Transport Infrastructure (PIANC) WG161 recommendations on shipping route width as described in the Applicant's Cumulative Regional Navigational Risk Assessment [APP-060] (Appendix E, Section 7.6) is applicable to navigation within Manx territorial waters between the Proposed Development and the proposed Moir Vannin OWF array. If not, why not? ii) Are the PIANC WG161 recommendations endorsed by the International Maritime Organisation? iii) Whether there are any contradictions between these PIANC WG161 recommendations and MGN654. iv) Whether there been any further related guidance on marine spatial planning for the interaction between maritime navigation and offshore windfarms produced since that 2018 PIANC WG161 report.</p>	<p>i) The PIANC WG161 guidance is "a set of recommendations and guidelines to assess sufficient manoeuvring space and the minimal distance between navigation and the offshore installations, to ensure that the risk to shipping is acceptable" (1.2.1.2 Objective and Product of the Study). There are no recommendations or restrictions on where or when it can or cannot be used. It is available guidance that can be used as necessary and it can be applied to any sea area. ii) The guidance has not been formally endorsed by the IMO, however several IMO member state representatives, including MCA, were either part of the working group or contributed to the report. iii) MCA is not aware of any contradictions between the PIANC guidance and MGN654. iv) Additional related guidance since 2018 can include, but not limited to, MGN654 and its Annexes (published in 2021).</p>
<p>SN 2.4 Precedent for restricted navigation corridors past OWFs The ExA invites comment from the listed IPs on the discussion of UK precedent for restricted channels between windfarms presented in [APP-060,</p>	<p>The gap between Morgan offshore wind farm and Moir Vannin offshore wind farm is not being considered as a 'corridor', as described in MGN654 paragraph 4.7.g. In light of the amended Moir Vannin boundary (as confirmed during the</p>

	Section 7.6 of Appendix E] as expanded in the Applicant's Annex 3.1 to responses to ISH2 Action Points [REP4-005] and invites suggestion of any other relevant precedent (whether or not flanked on both sides by offshore wind turbine arrays) of navigation route 'corridors' of restricted width, outwith ports and harbours.	Moor Vannin hazard identification workshop on 12/12/24) MCA is content the additional sea space of 4.1NM complies with guidance in MGN654.
SN 2.7	Security for continuation of the Marine Navigation Engagement Forum The listed IPs are asked to confirm if they consider that adequate security for post-consent stakeholder engagement would be provided by Commitment Co72 in the Commitments Register [REP4-025] which commits to continued engagement of the Marine Navigation Engagement Forum (MNEF) post-consent, and if not, why not.	MCA is content with the Applicant's commitment to continue the MNEF for five years after consent.
SN 2.8	Emergency response for disabled or drifting vessels in sea space between wind farms The UK Chamber of Shipping [REP3-025, UKCoS.SN.23b] continue to contend that emergency towage capability or resource may be required to mitigate risks from cumulative projects related to drifting (disabled) vessels in the corridors between proposed wind farms. The Applicant and the MCA are asked whether that capability would be made available as part of development post-consent of the Emergency Response and Cooperation Plan (ERCoP) secured by compliance with MGN654 under Condition 25 in the draft DMLs. If so, how might it be controlled by a Marine Coordination Centre as referenced in the Applicant's answer to ExQ1 SN 1.20 [REP3-006].	The MCA would wish to discuss the towing capability with the project and would draw their attention to section 3.8.13 and 3.8.14 of MGN645 Annex 5, which references towing. This would be expected in the post-consent and/or pre-construction stage. While the assessment of towing capability would be secured via the Vessel Traffic Management Plan, details of towing capability would be required to be contained within the ERCoP, or an update to the ERCoP.

Yours faithfully,



Nick Salter
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UK Technical Services Navigation