



Application by Morgan Offshore Wind Limited Morgan Offshore Wind Project: Generation Assets

The Examining Authority's written questions and requests for information (ExQ2) Issued on Thursday 19 December 2024

The following table sets out the Examining Authority's (ExA) further written questions and requests for information – ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Appendix C to the [Rule 6 letter](#) of 5 August 2024. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference which starts with a prefix for the relevant topic and then has a number 2 (indicating that it is from ExQ2) and a question number within the topic. For example, the first question on Cross-Topic, General and Miscellaneous issues is identified as GEN 2.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact morganoffshorewindproject@planninginspectorate.gov.uk and include 'Morgan OWF – ExQ2' in the subject line of your email.

Responses are due by Deadline 5: Thursday 16 January 2025



Abbreviation	Description	Abbreviation	Description
AEoI	Adverse Effects on Integrity	IP	Interested Party
BAE	British Aerospace	IPMP	In-Principle Monitoring Plan
CAA	Civil Aviation Authority	JNCC	Joint Nature Conservation Committee
CEA	Cumulative Effects Assessment	km	Kilometre
CMS	Construction Method Statement	m	Metre
CNP	Critical National Priority	MCA	Maritime and Coastguard Agency
DAERA	(Northern Ireland) Department of Agriculture, Environment and Rural Affairs	MGN	Marine Guidance Note
DCO	Development Consent Order	MMMP	Marine Mammal Mitigation Protocol
DML	Deemed Marine Licence	MMO	Marine Management Organisation
EIA	Environmental Impact Assessment	MOD	Ministry of Defence
EMP	Environmental Management Plan	NAS	Noise Abatement Systems
ES	Environmental Statement	NATS	National Air Traffic Service
ExA	Examining Authority	NFFO	National Federation of Fishermen's Organisations
FLCP	Fisheries Liaison and Co-existence Plan	NPS	National Policy Statement
HPAI	Highly Pathogenic Avian Influenza	NPS EN-1	Overarching National Policy Statement for Energy
HRA	Habitats Regulations Assessment	NPS EN-3	National Policy Statement for Renewable Energy Infrastructure
IoM	Isle of Man	NRA	Navigational Risk Assessment
IoMSPC	Isle of Man Steam Packet Company	NRW	Natural Resources Wales
INNS	Invasive Non-Native Species	NSIP	Nationally Significant Infrastructure Project



Abbreviation	Description	Abbreviation	Description
OWF	Offshore Wind Farm	SNCB	Statutory Nature Conservation Body
PIANC	World Association for Waterborne Transport Infrastructure	SPA	Special Protection Area
REWS	Radar Early Warning System	SSSI	Site of Special Scientific Interest
RIES	Report on the Implications for European Sites	TSC	Territorial Sea Committee
RSPB	Royal Society for the Protection of Birds	UK	United Kingdom
SAC	Special Area of Conservation	UXO	Unexploded Ordnance
SAR	Search and Rescue	VHF	Very High Frequency
SFF	Scottish Fishermen's Federation	VTMP	Vessel Traffic Monitoring Plan
SoCG	Statement of Common Ground	WCSP	West Coast Sea Products
SMZ	Scallop Mitigation Zone	WSI	Written Scheme of Investigation

The Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the [Examination Library](#). It will be updated as the examination progresses.

Citation of Questions

Questions in this table should be cited as the issue reference then the question number (for example, *ExQ2 GEN2.1* refers to the first question in this table).



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ExQ2	Question to:	Question:
GEN Cross-Topic, General and Miscellaneous Questions		
GEN 2.3	Applicant Interested Parties	<p>National Policy, Guidance and Legislation</p> <p>The Applicant and Interested Parties are asked to provide comment on further updates or changes to UK and Isle of Man Government legislation, policy or guidance relevant to the determination of this application that have been issued since submission of the application. Provide a summary of the implications, if any, for the Examination.</p> <p>Note: such updates include but are not limited to the National Planning Policy Framework published on 12 December 2024, the Clean Power 2030 Action Plan published on 13 December 2024, and other recently published Ministerial statements and policy papers.</p> <p>TSC Response</p> <p><i>The Marine Infrastructure (Consenting Process) Regulations 2024 came into force on 15th October 2024. Whilst not directly affecting the Morgan application these regulations set out the process and timescales for an application for Marine Infrastructure Consent.</i></p>
AR Aviation and Radar		
AR 2.1	BAE Systems Blackpool Airport Defence Infrastructure Organisation/ Ministry of Defence Isle of Man Government Territorial Seas Committee (Ronaldsway Airport) NATS En-Route plc	<p>Aviation and Radar Mitigation Progress Report</p> <p>The D4 update to the Aviation Mitigation Progress Report [REP4-028] now includes 'next steps' and expected timescales for conclusion of agreement as requested by the ExA at ISH2. Could all listed aviation and radar IPs confirm if the Applicant's summary of progress is correct and provide any necessary updates.</p> <p>TSC Response</p> <p><i>The TSC agrees with the summary as presented in the Aviation Mitigation Progress Report</i></p>
AR 2.4	Applicant Blackpool Airport Ronaldsway Airport	Very High Frequency (VHF) Communications

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ExQ2	Question to:	Question:
	<p>BAE Systems for Walney and Warton Aerodromes Defence Infrastructure Organisation Maritime and Coastguard Agency NATS En-Route plc</p>	<p>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.</p> <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> i) Clarify whether an assessment from NATS has now been commissioned (the progress report [REP4-028] states it is ‘commissioning’ an assessment) and advise the likely timescale for its production and submission. ii) Clarify whether potential effects to VHF communications should be considered as part of the EIA process. <p>The Applicant and the listed IPs are asked to:</p> <ul style="list-style-type: none"> iii) Provide a summary of the ongoing discussions on this VHF matter. iv) Provide the wording of a preferred (without prejudice) DCO requirement in the event that the matter is not resolved and/or a commercial agreement is not reached before the end of the Examination. This should also be recorded in the final SoCGs. <p>The MCA is asked to:</p> <ul style="list-style-type: none"> 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>TSC Response</p> <p><i>iii). The NATS report states in the section on Radio Communication assessment:</i></p> <p><i>“CAP-670 Appendix A to GEN 02 provides the basis for air-ground radio assessments of turbines in the United Kingdom. The CAP-670 methodology involves two phases; an initial zonal assessment based on turbine classification and, if required, a more detailed carrier to interference ratio assessment.</i></p> <p><i>The CAP-670 turbine classifications range from “Small” to “Large Industrial” based on turbine characteristics such as hub and tip height.</i></p> <p><i>Unfortunately the largest turbine class tops out at 158m to tip which is less than half the size of the turbines being proposed and therefore the published red/amber/green volumes of the zonal assessment are not applicable.</i></p>

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		<p><i>It is possible to assume “Amber” and to scale the more detailed carrier to interference, C/I, ratio assessment by using the formula provided to calculate a bi-static RCS outside the range provided in CAP670 tables 4 and 5.</i></p> <p><i>Modelling 172 turbines is very computationally intensive and as these will not likely be the final locations this would not yield a definitive result in any case.</i></p> <p><i>It was therefore decided to model the best (Mona T16) and worst (Morgan T11) case turbine to get a feel for the likely volume of impact with the caveat that the cumulative effect of multiple turbines may inflate these volumes somewhat.”</i></p> <p><i>The impact from Morgan T11 can theoretically be seen in simulations up to 9,000ft.</i></p> <p><i>iv) Due to the extreme difficulty modelling these scenarios, IOM Airport suggest a “wait and see” approach is taken. As the concerns regarding VHF are relevant to a number of IPs we would suggest that the general wording of a DCO commitment should be agreed collectively. Suitable wording could be: “Any disruption to VHF air-ground-air communications observed by the Operator and reported to the Isle of Man Civil Aviation Administration and the Secretary of State within 3 years from the hanging of blades at the Authorised Development shall result in its cause and effect to be investigated by a party agreed jointly by the Authorised Development and the Operator, and for appropriate mitigation to be implemented and maintained for the life of the Authorised Development.”</i></p>
CF Commercial Fisheries		
CF 2.3	National Federation of Fishermen’s Organisations Scottish Fishermen’s Federation West Coast Sea Products Any other Interested Parties	<p>Satisfaction with cable installation and protection commitments submitted at D4</p> <p>The ExA notes the outline Construction Method Statement (CMS) submitted at Deadline 4 includes at Annex A: Outline Cable Specification and Installation Plan (CSIP) including Cable Burial Risk Assessment (CBRA), and at Annex B: Scour Protection and Cable Protection Management [REP4-032]. The Applicant has also revised the wording of TM17 in the outline FLCP [REP4-021].</p> <p>The Fisheries IPs are requested to confirm if they now sufficiently satisfied with the commitments contained in the outline CSIP/CBRA [REP4-032] and within the Commitments</p>

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ExQ2	Question to:	Question:
		<p>Register [REP4-025], notably commitments Co19 to Co30 inclusive, to be able to agree with the principle of the Scallop Mitigation Zone as proposed.</p> <p>TSC Response</p> <p><i>The TSC agree with the principle of the proposed Scallop Mitigation Zone. However, the efficacy of this can only be considered in full once a) the final design of the project, including the layout of seabed cable infrastructure, has been determined, and b) post-construction assessment of cable burial depth has been published which shows whether the target burial depths of any cables located within the Scallop Mitigation Zone has been achieved. The TSC position is that the efficacy of the Scallop Mitigation Zone could potentially be significantly reduced to the extent that no mitigation is provided if the area has a significant amount of cable infrastructure, and particularly if those cables do not achieve the target burial depth. The effect on CF activity should be re-assessed by the applicant post-construction taking into consideration these factors in consultation with fishing industry stakeholders.</i></p> <p><i>The updated wording of TM17 in the outline FLCP is welcome although it is noted this doesn't fully agree with what was stated in SOCG discussions and during the ISH2 hearings. In these it was specified that monitoring would cover both Queen and King Scallop and will be consistent with other regional monitoring programmes. The TSC would also suggest there should be a commitment to engagement on the results (rather than just reporting) and agreeing next steps as appropriate.</i></p>
CE Cumulative Effects		
CE 2.4	Applicant Mooir Vannin Offshore Wind Farm Limited Isle of Man Government TSC	<p>Mooir Vannin Offshore Wind Farm</p> <p>In the event that further environmental information is made publicly available, or the Marine Infrastructure Consent application is submitted to the Isle of Man Government prior to the close of the Examination, the listed parties are asked to:</p> <ul style="list-style-type: none"> i) Comment what approach should be taken by the Applicant to reviewing the CEA (and in-combination assessment) in time for the close of the Examination so that the ExA has an opportunity to consider it and that the Secretary of State is fully informed.

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ExQ2	Question to:	Question:
		<p>ii) Provide commentary on the scenario that the Marine Infrastructure Consent application is determined by the Isle of Man (IoM) Government prior to a decision on the Proposed Development by the Secretary of State for Energy Security and Net Zero.</p> <p>TSC Response</p> <p>i) <i>The Mooir Vannin Marine Infrastructure Consent application will be submitted after the close of examination for Morgan (10/03/25) so would not be available for consideration by the ExA prior to the close.</i></p> <p>ii) <i>We would view this scenario as unlikely given that the application for Mooir Vannin is proposed to be submitted after the close of Examination for Morgan. If and when an application for marine infrastructure consent is submitted, it will follow a statutory timetable as set out in the Marine Infrastructure Management Act 2016 – it is highly unlikely that a decision on this application will be returned prior to Q1/Q2 2026 and if the decision is by way of a statutory document, it will be required to navigate the necessary Tynwald process thereafter. However, there is a level of uncertainty as to the time it will take for the Secretary of State to make the final decision on this DCO application, and that’s something that is outwith the Isle of Man. If such a situation were to occur, how this would affect the Morgan Application is a question for the Secretary of State and the Applicant.</i></p>
HRA Habitats Regulations Assessment		
HRA 2.8	Applicant Isle of Man Government	<p>Isle of Man Ramsar Sites</p> <p>Further to the Applicant’s response to ExQ1 MO 1.17 the IoM Government TSC confirmed in their response to ISH2 action point 19 that the Applicant has given appropriate consideration to the relevant seabird colonies and listed/proposed Ramsar sites [REP4-039].</p> <p>The Applicant is asked to ensure that the HRA screening report is updated by D6 to include the information provided.</p> <p>The IoM Government TSC and the Applicant are asked to include the matter in the next version of their SoCG.</p>

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ExQ2	Question to:	Question:
		<p>TSC Response</p> <p>The TSC can confirm this has been added to the current draft SOCG</p>
<p>INF Other Offshore Infrastructure and Activities</p>		
<p>INF 2.1</p>	<p>Applicant Manx Utilities NATS En-Route Ltd</p>	<p>Co-operation or co-existence agreements with other infrastructure operators</p> <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> i) Confirm that there are no other organisations expected to be subject to co-operation or co-existence agreements. ii) Provide a final update to the Commercial Side Agreements Tracker at Deadline 6. <p>Manx Utilities and NATS are asked to confirm their positions on the status set out in Table 1.1 of the Applicant’s Commercial Side Agreements Tracker [REP3-023].</p> <p>TSC Response</p> <p>ii) <i>Manx Utilities continue to experience positive communications and receive regular updates from the applicant regarding the project and associated progress towards an Offshore Proximity Agreement for Manx 1 Interconnector; therefore Manx Utilities have no concerns with the planned progress towards execution of the agreement at this stage.”</i></p>
<p>SN Shipping and Navigation</p>		
<p>SN 2.1</p>	<p>Isle of Man Territorial Sea Committee Maritime and Coastguard Agency UK Chamber of Shipping</p>	<p>Guidance on navigational route width in IoM territorial waters</p> <p>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:</p> <ul style="list-style-type: none"> 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

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		<p>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?</p> <p>ii) Are the PIANC WG161 recommendations endorsed by the International Maritime Organisation?</p> <p>iii) Whether there are any contradictions between these PIANC WG161 recommendations and MGN654.</p> <p>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>TSC Response</p> <p><i>i) These recommendations would be seen as generally applicable to various maritime regions, including Manx territorial waters, as they offer a framework for minimising navigational risks around OWF’s and are seen as good industry advice from experts in their field. The Isle of Man would defer to MGN654. Neither of these 2 guidance documents are incorporated in Isle of Man Legislation but are seen as good practice.</i></p> <p><i>iii & iv) MGN654 was published 3 years after PIANC WG161 and includes reference to the PIANC report. MGN654 is referenced by MCA in their latest (2024) guidance https://www.gov.uk/guidance/offshore-renewable-energy-installations-impact-on-shipping</i></p>
SN 2.3	<p>Isle of Man Territorial Sea Committee</p> <p>Moor Vannin Offshore Wind Farm Limited</p> <p>Stena Line</p> <p>UK Chamber of Shipping</p>	<p>Design vessel length in relation to PIANC guidance for safe passage space</p> <p>The IPs listed are asked to comment on what would be a reasonable ‘design vessel’ length overall (LOA) to be applied in relation to the PIANC guidance on route width as discussed in [APP-060, Appendix E, Section 7.6] considering the vessels expected to transit the sea space between the Proposed Development and the proposed Moir Vannin OWF, either on passage to or from the Port of Douglas or on passage past the east and north of the Isle of Man.</p> <p>TSC Response</p>

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		<p><i>IOMSPCo's largest vessel has an LOA of 133m, this vessel being the most frequent transitter with 4 transits (2 return crossings) per day between the Proposed Development and the proposed Moir Vannin OWF.</i></p> <p><i>It would be expected that any vessels transiting to or from the Port of Douglas between Morgan and Moir Vannin would be similar to the numbers transiting between Morgan and Walney OWF as outlined in Table 29 in APP-060, Appendix E, Section 7.6. 1851 passenger vessels per year and 171 cargo/tanker vessels per year. The Nash report refers to occasional vessels of 300metres but unclear if this includes the area between Moir Vannin and Morgan.</i></p>