

The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

16 January 2025

Dear Ms Hunt,

Morgan Offshore Wind Project: Generation Assets Development Consent Order Application

Moor Vannin Offshore Wind Farm Limited's Responses to:

- **The Examining Authority's second written questions and request for further information (ExQ2); and**
- **Action Points raised during ISH2.**

In its second written questions (ExQ2) the Examining Authority put nine questions to Moor Vannin Offshore Wind Farm Limited. These covered topics including general, cumulative effects, other offshore infrastructure and shipping and navigation. Moor Vannin Offshore Wind Farm Limited's responses to those questions are set out in Table 1 below.

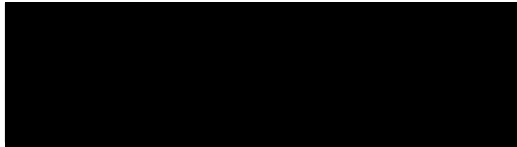
In addition to the nine written questions. Moor Vannin Offshore Wind Farm Limited also received four Action Points arising from Issue Specific Hearing 2. Responses to these Action Points are provided below in Table 2.

Moor Vannin Offshore Wind Farm Limited has also submitted the following additional documents to support this response:

1. Moor Vannin and Morgan Gap Position Paper
2. Moor Vannin Generation Project Indicative Layout
3. East Irish Sea Transmission Project Section 35 Direction
4. East Irish Sea Transmission Project Qualifying Request s35 Cover Letter
5. East Irish Sea Transmission Project Qualifying Request s35 Supporting Statement
6. East Irish Sea Transmission Project Section 35 Direction Figure 1 Indicative Location Plan
7. East Irish Sea Transmission Project Section 35 Direction Figure 2 Indicative Location Plan Onshore

Yours sincerely

For and on behalf of Moor Vannin Offshore Wind Farm Limited



Dr Julian Carolan
Moor Vannin Consent Project Manager



Table 1: Moor Vannin responses to ExQ2

GEN Cross-Topic, General and Miscellaneous Questions			
GEN 2.8	Applicant Moor Vannin Offshore Wind Farm Limited	SoCG with Moor Vannin Offshore Wind Farm Limited The Applicant is requested to submit by D5 a SoCG with Moor Vannin Offshore Wind Farm Limited in accordance with the ExA’s Rule 6 letter [PD-001] (Appendix G page 33) that refers to “other wind operators that have made relevant representations”. The SoCG is to be submitted in final signed form at D6.	The Applicant provided Moor Vannin Offshore Wind Farm Limited with a draft SoCG on 8 January 2025 and this is currently being reviewed by Moor Vannin Offshore Wind Farm Limited.
CE Cumulative Effects			
CE 2.2	Moor Vannin Offshore Wind Farm Limited	Moor Vannin Offshore Wind Farm i. Provide an update on any progress to submission of your application for Marine Infrastructure Consent, noting any changes to the timeline provided in your answer to CE 1.5 [REP3-041]. ii. Provide details of any further environmental information which has become publicly available since the publication of the preliminary environmental information in August 2024.	As set out in REP3-041, the timeline of Moor Vannin remains: <ul style="list-style-type: none"> • Submission of EIA Scoping Report - November 2023 • Phase 1 Community Consultation - November 2023 • Publication of Preliminary Environmental Information (PEI) - August 2024 • MIC Application - anticipated March 2025 • Examination - anticipated June to December 2025 • MIC Consent Award - anticipated April 2026 • Construction Start - anticipated Q2 2030 <p>Since, publication of the PEI materials in August 2024, refinement of the order limits has been undertaken, including refinement to the proposed Offshore Array area. Details regarding this refinement can be found in the Moor Vannin and Morgan Gap Position Paper and the New Offshore Array and Indicative Layout PDF submitted with</p>

			<p>this response. Additionally, a shapefile of the refined Order Limits was provided to the Applicant in December 2024.</p> <p>The Environmental Impact Assessment for the Moor Vannin Offshore Wind Farm is now largely complete and the results of the impact assessments can be made available to the Applicant to update their CEA for the respective receptor assessments.</p>
CE 2.4	<p>Applicant</p> <p>Moor Vannin Offshore Wind Farm Limited</p> <p>Isle of Man Government TSC</p>	<p>Moor 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> <p>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.</p> <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>(i) The Environmental Impact Assessment for the Moor Vannin Offshore Wind Farm is now largely complete and the results of the impact assessments can be made available to the Applicant to update their CEA for the respective receptor assessments.</p> <p>Moor Vannin Offshore Wind Farm Limited is willing to make these available to the Applicant as they are finalised between now and the end of February, and by no later than the proposed MIC Application date of 12th March 2025.</p> <p>Following submission of the MIC Application the Examination is anticipated to commence in June 2025 and conclude in December 2025, with the award of the MIC by April 2026.</p> <p>(ii) It is for the respective decision makers to make a decision based on the environmental information before them at the point of the decision, in accordance with the relevant statutory processes.</p> <p>Moor Vannin Offshore Wind Farm Limited has offered to provide the Applicant with additional information about the</p>

			<p>project to enable any necessary updates to be made to the CEA and in-combination assessments before the close of Examination (as stated above and in [REP3-041]). Moor Vannin Offshore Wind Farm Limited considers that sufficient information about the Moor Vannin project will be available at the point at which the Secretary of State takes a decision on the Morgan DCO application and so any relevant cumulative and in-combination effects can be taken into account regardless of whether a decision has been taken on the MIC Application at that point in time.</p>
CE 2.5	Moor Vannin Offshore Wind Farm Limited	<p>Moor Vannin Offshore Wind Farm transmission infrastructure The D4 update to the Report on Interrelationships with Other Infrastructure Projects [REP4-016] (paragraph 1.2.1.5, Tables 1.1 and 1.2) refers to a separate project for the Moor Vannin transmission infrastructure (the ‘East Irish Sea Transmission Project’) located in English waters, which is in early-stage development and has been the subject of a Section 35 Direction granted on 24 October 2024.</p> <p>Moor Vannin Offshore Wind Farm Limited is asked to submit a copy of the Direction and any other supporting information, including potential timescales for application submission, which would assist the Examination.</p>	<p>A copy of the Section 35 Direction and all submitted supporting information is provided alongside this response.</p> <p>The anticipated schedule for Moor Vannin Offshore Wind Farm Limited’s East Irish Sea Transmission Asset Project is as follows:</p> <ul style="list-style-type: none"> • Submission of EIA Scoping Report – Q1 2025 • Publication of Preliminary Environmental Information (PEI) – Q4 2025 • DCO Application - anticipated Q2 2026 • Examination - anticipated Q3 2026 • DCO Consent Award - anticipated Q3 2027 • Construction Start - anticipated Q4 2029
INF Other Offshore Infrastructure and Activities			

<p>INF 2.9</p>	<p>Moor Vannin Offshore Wind Farm Limited Ørsted IPs</p>	<p>Moor Vannin Offshore Wind Farm Application The Applicant’s response to the Ørsted IPs D3 submission on wake effects [REP4-009, point REP3-070.24] notes that: “The Moor Vannin Scoping Report does not contain reference to wake effects ... it appears that Ørsted do not consider it necessary for their own projects to make an assessment of such matters (as has been the case for the other six Ørsted projects that have been brought forward under the Planning Act to date). Further, the Applicant cannot see any response to the Scoping Report from the Ørsted IPs to Moor Vannin in the Scoping Opinion. The Applicant is surprised by this given the Ørsted IPs claimed importance of an assessment being undertaken for all of the Round 4 developments (both within the Irish Sea and North Sea). The Moor Vannin project is of a similar size, location and distance from the Ørsted IPs assets compared to the Morgan Generation Assets and is therefore assumed to have an equivalent wake effects potential on the Ørsted IPs assets”. Moor Vannin Offshore Wind Farm Limited are asked:</p> <p>i) Has a wake loss assessment been carried out regarding effects on AEP of the Ørsted IPs existing OWFs within the Irish Sea, and if so, will it inform the forthcoming submission for</p>	<p>(i) Moor Vannin Offshore Wind Farm Limited has undertaken a wake loss assessment regarding effects from Moor Vannin OWF on AEP of the Ørsted IPs’ existing OWFs within the Irish Sea.</p> <p>Whether this wake loss assessment is submitted as part of the application for Marine Infrastructure Consent will be determined by the status of commercial discussions.</p> <p>The impact of Moor Vannin on other Irish Sea OWFs is not relevant to the Morgan OWF Examination. Morgan must be determined on its own merits informed by its own impact assessment which should have included all Irish Sea offshore wind farms (including Moor Vannin).</p> <p>(ii) Moor Vannin Offshore Wind Farm Limited is not aware of any reference to such an assessment in policy, legislation or seabed leasing conditions in the Isle of Man.</p> <p>Regardless of the scope of and requirements of the MIC Application, the Applicant for the Morgan OWF DCO is required to assess the impacts of its project on Moor Vannin in accordance with the applicable legislation and policy governing its DCO application.</p> <p>It should be noted that the Moor Vannin site was awarded to Ørsted in November 2015, well before the round 4 bidding process relevant to the Morgan OWF concluded. As a result, prospective developers were on notice of potential wake effects from Moor Vannin at the time of bidding and would have had the opportunity to build the consequences of those effects into their business cases.</p>
----------------	---	--	--

		<p>Marine Infrastructure Consent, including consideration of any mitigation?</p> <p>ii) Is there any reference in Isle of Man policy or legislation or seabed leasing conditions for such an assessment?</p> <p>The Ørsted IPs are asked to provide comment on the Applicant’s response [REP4-009] in respect of potential wake effects of Moor Vannin Offshore Wind Farm, and its comments in relation to ISH2 action point 11 [REP4-004] regarding the specific exclusion of Moor Vannin Offshore Wind Farm from the Wake Impact Assessment Report [REP4-049].</p>	<p>Moor Vannin considers that the Morgan OWF will have an impact on the energy yield of the Moor Vannin OWF and a wake loss assessment considering the impacts of Morgan OWF on Moor Vannin should have been undertaken by the Applicant and impacts appropriately mitigated or compensated.</p> <p>If the ExA are minded to recommend that the SoS includes provision in the Morgan DCO relating to wake loss and compensation assessment requirements, it would be appropriate to apply those requirements to all Irish sea offshore wind farm projects potentially impacted by Morgan (and that would include Moor Vannin Offshore Wind Farm).</p>
SN Shipping and Navigation			
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 Moor 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>The 300m length considered in relation to the PIANC guidance for corridors between the TCE Round 4 developments is highly conservative based on typical vessel traffic in the region as a whole. Therefore, Moor Vannin Offshore Wind Farm Limited consider it is a reasonable value noting that typically either the maximum length, maximum 90th percentile length, or average length is considered in this context. The choice is dependent on the nature of the vessel traffic dataset being assessed.</p>
SN 2.4	Maritime and Coastguard	<p>Precedent for restricted navigation corridors past OWFs</p>	<p>Moor Vannin Offshore Wind Farm Limited would suggest that it is not appropriate to consider precedent since every</p>

	<p>Agency</p> <p>Moor Vannin Offshore Wind Farm Limited</p> <p>Stena Line</p> <p>UK Chamber of Shipping</p>	<p>The ExA invites comment from the listed IPs on the discussion of UK precedent for restricted channels between windfarms presented in [APP-060, 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.</p>	<p>corridor scenario is different; each should be considered on a case by case basis. It is also not relevant for Moor Vannin Offshore Wind Farm Limited to comment on the corridors between the TCE Round 4 developments. It should be noted that Moor Vannin Offshore Wind Farm Limited does not consider the gap between Moor Vannin and Morgan to be a ‘corridor’ since there is only a singular narrowest point without surface piercing structures located consistently to both port and starboard for a passing vessel.</p>
<p>SN 2.5</p>	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Outstanding responses to Action Points from Issue Specific Hearing 2</p> <p>Moor Vannin Offshore Wind Farm Limited is asked to coordinate the following with its responses to Action Points from ISH2 issued for its attention [EV5-014, APs 7 to 10 inclusive]:</p> <p>i) A summary note describing the conclusions of its NRA to date exclusively with regard to navigational risk in the sea space adjacent to the Moor Vannin and Morgan projects and the Walney Extension OWF, including a summary statement on any bridge simulations carried out or the scope and intention of any further bridge simulations planned to study use of that sea space. Note: the ExA does not wish to receive into the Examination the entirety of the Moor Vannin NRA.</p>	<p>Please see responses below in Table 2 to the Action Points from ISH2.</p> <p>Regardless of the conclusions of Moor Vannin’s NRA, the Examining Authority and the Secretary of State must consider the Morgan OWF DCO application in accordance with the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the relevant National Policy Statements. This legislation and statutory policy requires the Morgan DCO Applicant to identify, assess and mitigate likely significant effects on shipping stakeholders, including transboundary stakeholders.</p>

		<p>ii) A plan illustrating the proposed structures boundary or order limits following your December NRA workshop and having regard to your answer to ExQ SN1.9 [REP3-041], if different to that shown in [REP3-039] Indicative WTG Layout February 2024.</p>	
<p>SN 2.6</p>	<p>Applicant Moor Vannin Offshore Wind Farm Limited</p>	<p>Safe route width between Proposed Development and Moor Vannin OWF The ExA invites both the Applicant and Moor Vannin Offshore Wind Farm Limited to provide draft wording for a requirement in the draft DCO or a condition in the draft DMLs ensuring that a sufficient separation distance between the Proposed Development structures and the proposed Moor Vannin structures must be achieved in final design layout by the second of the two proposals to receive development consent (if both projects are granted consent) in order to ensure an acceptable residual level of navigational safety risk in that sea space can be achieved that is acceptable to both the IoM Government Harbours Division and the MCA as well as shipping stakeholders.</p> <p>Please also provide an opinion whether this would be more appropriate as a requirement to be discharged by the Secretary of State or a condition to be discharged by the MMO</p>	<p>This question suggests that it is for the second project that is consented to mitigate the impact however this is not appropriate. The impacts are already understood and are primarily caused by the Morgan OWF which is displacing regular routeing northwards into the gap between Moor Vannin and Morgan. Further details can be found in the Moor Vannin and Morgan Gap Position Paper which also highlights that Moor Vannin Offshore Wind Farm Limited has already made significant site refinements to increase navigable sea room and facilitate coexistence.</p> <p>The Moor Vannin array area is wholly within the Isle of Man territorial seas, and therefore falls under the jurisdiction of the Isle of Man Government and not the Secretary of State or the MMO. It would not be appropriate, or indeed competent for Morgan’s DCO to include a requirement which in any way restricts Moor Vannin’s development within Isle of Man territorial seas, as appears to be proposed by the Examining Authority. It is for the Isle of Man Government, within its own territorial jurisdiction to determine appropriate requirements for the Moor Vannin Marine Infrastructure Consent.</p> <p>One option for securing an appropriate separation distance within the Morgan DCO would be a Structures Exclusion Zone/Obstacle Free Zone (see for example, Requirement 4</p>

			<p>of the East Anglia ONE Offshore Wind Farm Order 2014, see also Requirement 29 of the North Falls Draft Development Consent Order). In the event that the ExA are minded to recommend such a requirement, any ability to deviate from the exclusion zone built into the requirement would need involve consultation with relevant stakeholders. In the event that the ExA are not minded to recommend such a requirement, Moor Vannin Offshore Wind Farm Limited would suggest that Morgan’s DCO includes a DML condition requiring the MMO to consult with Moor Vannin and relevant shipping stakeholders prior to discharging Morgan’s design plan.</p>
--	--	--	---

Table 2: Moor Vannin Responses to Action Points from ISH2

Action Point	Party	Action	Moor Vannin Response
7	Moor Vannin Offshore Wind Farm Limited	The ExA invites Moor Vannin OWF Limited to submit (having reviewed the recording of ISH2) any comments you may have on or observable hazards to or constraints to navigation of ferries and commercial shipping in the sea space between the Isle of Man and the Cumbrian coast indicated on the chart submitted as Figure 14.3 in your Scoping Report [REP3-043] with regard to the AIS-tracked traffic routes indicated on the Shipping and Navigational Study Area Figure 14.2 in that same submission.	<p>In relation to routeing by commercial ferries operated by the Isle of Man Steam Packet Company, there is no significant risk when considering Moor Vannin in isolation. Only with the presence of Morgan are vessels utilising the Douglas-Heysham route displaced towards Moor Vannin. The gap between Moor Vannin and Morgan is discussed in detail in the Moor Vannin and Morgan Gap Position Paper provided with this submission.</p> <p>In relation to routeing by commercial ferries operated by Stena Line, the complexity of the cumulative scenario incorporating Moor Vannin, Morgan, Mona and Morecambe is acknowledged. From a review of vessel traffic data and consultation feedback Moor Vannin</p>

			<p>Offshore Wind Limited understands that around 75% of vessels utilising the Belfast-Liverpool route pass south of the Isle of Man, resulting in no interaction with Moor Vannin. The cumulative build out may influence this proportion but Stena Line have indicated that there is a need to retain the optionality provided by this route for specific adverse weather conditions.</p>
8	Moor Vannin Offshore Wind Farm Limited	<p>The ExA invites Moor Vannin OWF Limited to submit a detailed study of the use of sea space adjacent to the Moor Vannin southern and eastern Agreement for Lease (AfL) boundaries recognising the constraint of the Morgan Generation Assets Proposed Development order limits, indicating:</p> <ul style="list-style-type: none"> a) any constraints to navigation features and any aids to navigation present or proposed plus any temporary safety zones likely to be applied for around turbines for construction and major maintenance; b) the prudent clearing distances for vessels passing in each direction including any north-south passage, in typical metocean conditions; and c) the same information for reasonable worst-case adverse 	<p>The sea room between Moor Vannin and Morgan will be considered as part of the Moor Vannin Navigational Risk Assessment which is currently being undertaken. However, such a responsibility also applies to the Applicant, particularly given that it is Morgan OWF which is displacing regular routeing northwards into the gap between Moor Vannin and Morgan. This is set out further in the Moor Vannin and Morgan Gap Position Paper which also highlights that Moor Vannin Offshore Wind Limited has already made significant site refinements to increase navigable sea room.</p> <p>The sea room between Moor Vannin and Walney Extension will be considered as part of the NRA which is currently being undertaken by Moor Vannin Offshore Wind Limited. Discussions are ongoing with Stena Line as the main vessel operator anticipated to use this sea space to reach an agreement to mitigate the commercial impact of displacement.</p> <p>Relevant commitments currently made by Moor Vannin include:</p>

		<p>metocean conditions in which prudent mariners would be making passage.</p>	<p>Co9: Establishment of offshore construction safety zones of up to 500 m around infrastructure during construction and major maintenance in the O&M phase.</p> <p>Co31: Implementation of 50 m advisory safety zones around operational offshore surface infrastructure.</p> <p>Co33: Development of, and adherence to, an Aids to Navigation Plan (ANP).</p>
<p>9</p>	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>The ExA invites Moor Vannin OWF Limited to submit a summarised report on your Navigational Risk Assessment (NRA) workshop planned for December including any preliminary conclusions on the top three residual cumulative navigational risks after mitigation, and the outline scope of any navigational bridge simulation undertaken or planned</p>	<p>The Shipping and Navigation Hazard Workshop was held in Douglas on 12th December 2024. Two sessions were held – the first with key commercial ferry operators (Stena Line, Isle of Man Steam Packet Company and WS Mezeron) and the second with a wider group representing shipping and navigation interests. The workshop included an overview of the Moor Vannin project and planned methodology for the Navigational Risk Assessment, review of the baseline environment, and open discussion around shipping and navigation hazards. The project overview included an update to the red line boundary, with a 17% refinement of the Moor Vannin Offshore Array to establish a minimum 4.1 nautical mile gap established between the Moor Vannin Offshore Array and Morgan Array Area. This gap was a key topic of discussion with the Isle of Man Steam Packet Company raising concerns that there may not be sufficient navigable sea room on a cumulative level. Further information on the gap can be found in the Moor Vannin and Morgan Gap Position Paper.</p> <p>Moor Vannin are not in a position to set out the top three residual cumulative risks at this point in Application</p>

			<p>preparation. However, focussing on the Moor Vannin-Morgan gap and as set out in the Position Paper, the location of the Applicant’s array area results in a deviation to the Douglas/Heysham route, pushing the route north towards the Moor Vannin southern boundary. Moor Vannin recognise the importance of this lifeline service route and have therefore undertaken site refinement over and above that undertaken by the Applicant, to increase the gap spacing to 4.1nm. As such, Moor Vannin’s position is that any further increase to the width of the Moor Vannin – Morgan gap should be the responsibility of the Applicant to ensure an equitable approach is taken to mitigating impacts. Please see the attached Position Paper for full details on this position.</p> <p>There is no plan to undertake bridge simulations as part of the Moor Vannin NRA.</p>
10	Moor Vannin Offshore Wind Farm Limited	<p>The ExA invites Moor Vannin OWF Limited to submit a paper discussing transboundary jurisdictional and policy compliance considerations concerning control of navigational safety risk to tolerable and ALARP in the event that Moor Vannin OWF Limited were to be granted development consent before the Morgan Proposed Development, with focus on cumulative effects assessment of impact to shipping and navigation receptors.</p>	<p>See Moor Vannin’s response to CE 2.4 and SN 2.6 above.</p> <p>The Examining Authority and the Secretary of State must consider the Morgan OWF DCO application in accordance with the Planning Act 2008, the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the relevant National Policy Statements. This legislation and statutory policy requires the Morgan DCO Applicant to identify, assess and mitigate likely significant effects on shipping stakeholders, including transboundary stakeholders and this is regardless of the timing of determination of the MIC Application.</p>