



Moor Vannin Generation Project

Position Paper

Moor Vannin and Morgan Gap

Revision Summary					
<i>Rev</i>	<i>Date</i>	<i>Prepared by</i>	<i>Checked by</i>	<i>Accepted by</i>	<i>Approved by</i>
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1.1 Introduction

- 1.1.1.1 Mooir Vannin Offshore Wind Farm Limited is proposing to develop the Mooir Vannin Generation Project, hereafter Mooir Vannin, which will be located approximately 11 km from the east coast of the Isle of Man and wholly within the Isle of Man's Territorial Seas.
- 1.1.1.2 This Position Paper sets out Mooir Vannin's position regarding the separation distance, hereafter referred to as the 'gap', between the Mooir Vannin offshore array and the Morgan Offshore Wind Farm (OWF) array area.

1.2 Baseline position of Mooir Vannin

- 1.2.1.1 In May 2014, the Isle of Man Government issued an invitation to tender for an offshore wind farm lease area wholly within the Isle of Man Territorial Seas. Mooir Vannin, then operating as DONG Energy Isle of Man (UK) Limited took part in the competitive bidding process and was selected as the 'preferred bidder' in October 2014. In November 2015, an Agreement for Lease (AfL) was signed between Mooir Vannin and the Isle of Man Government. This AfL identified an area of approximately 253 km² to the east of the Isle of Man for a potential offshore wind farm.
- 1.2.1.2 Morgan OWF is located wholly within English Territorial Seas, to the southeast of Mooir Vannin's AfL. The original 322 km² Morgan AfL, signed in 2023, was 1.4 nm at the closest point from Mooir Vannin's AfL shown in Figure 1 below.
- 1.2.1.3 Based on vessel traffic data collected and analysed for the draft Mooir Vannin Navigational Risk Assessment (NRA) the Isle of Man Steam Packet Company operate two commercial ferry routes to/from Douglas Harbour. One of these routes operates between Douglas and Heysham, with options passing north and south of the Millom West gas platform. In 2015, when the Mooir Vannin AfL area was identified, the separation from Mooir Vannin to the closest Steam Packet route was minimum 1.8 nm.
- 1.2.1.4 The Morgan OWF array area directly overlaps with, or is in close proximity to, both of the Douglas/Heysham Steam Packet routes as shown below in Figure 1. The routes will therefore be displaced northwards by the proposed Morgan red line boundary as illustrated below and independent of the presence of Mooir Vannin.

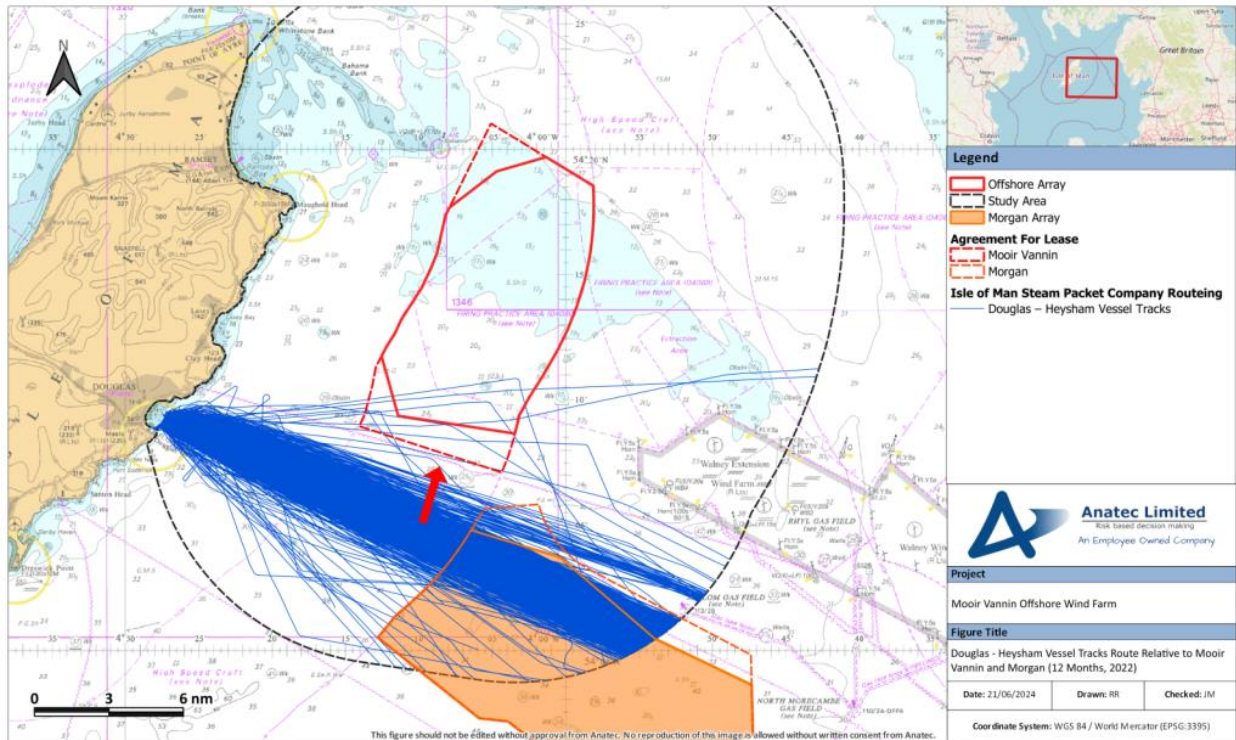


Figure 1: Moir Vannin and Morgan OWF AfLs in relation to Douglas – Heysham Routes

1.3 Moir Vannin and Morgan ‘gap’ refinements

- 1.3.1.1 Moir Vannin and Morgan OWF began engagement in October 2022, with an introductory meeting, in which the Moir Vannin team confirmed the timeline for development and requested that Moir Vannin be considered in all relevant cumulative assessments for Morgan OWF. Additionally in October 2022, Moir Vannin shared a copy of the project’s AfL coordinates with Morgan OWF for the purposes of assessment.
- 1.3.1.2 Moir Vannin was not included within Morgan OWF’s Navigational Risk Assessment published at PEIR. As such it was not possible for Moir Vannin to provide meaningful comment on the gap between the two projects at that time.
- 1.3.1.3 Following PEIR, the Morgan OWF order limits were refined. The proposed array footprint was reduced from 322 km² to 280 km², a reduction of approximately 13%. This reduction set back the Morgan OWF array area from the gap by 1.1 nm, thus increasing the gap between the two projects to 2.5 nm.
- 1.3.1.4 Representatives from Moir Vannin were invited to attend the Morgan, Mona and Morecambe Hazard Workshop in Liverpool in September 2023. At this workshop, slides were presented concluding that despite reduction of Morgan OWF’s order limits to increase the gap to 2.5 nm, that vessels were still unable to maintain a 1nm Closest Point of Approach (CPA) from vessels and structures between the projects and concluded there remained an unacceptable risk of collision and allision within the gap.
- 1.3.1.5 In response to the Moir Vannin Scoping Report (October 2024), Preliminary Environmental Information consultation (July/August 2024) and the Moir Vannin draft NRA (August 2024) Moir Vannin received feedback from shipping and navigation stakeholders that the gap between the two projects could pose a potential navigational risk. This feedback spanned both Morgan OWF’s original AfL and revised

order limits. Additionally, Mooir Vannin were aware of the conclusions of the Morgan OWF NRA and Hazard workshop.

- 1.3.1.6 Despite, the impact on the lifeline service between Heysham and Douglas arising as a result of the Morgan OWF re-routing the vessels north towards the Mooir Vannin offshore array, Mooir Vannin recognised the importance of this route and undertook order limit refinements with the aim of ensuring safe navigable sea room. Based on feedback from stakeholders, Mooir Vannin sought to ensure that minimum 1nm CPA was achievable within the gap between passing vessels and infrastructure.
- 1.3.1.7 Mooir Vannin also note these refinements align with the public agreement between the Isle of Man Steam Packet Company and Morgan in their Statement of Common Ground [REP3-026], in which agreement was reached that *"the passage between Morgan Array Area and Walney Offshore Wind Farms (with a width of 4.1 nm to 5.3 nm) and Mona and Morgan (6 nm) is acceptable in most weather conditions and credible traffic situations to ensure safe action can be taken to maintain CPA of >1 nm from other vessels structures (as demonstrated during the navigation simulations with IoMSPC in September 2023)."*
- 1.3.1.8 The Mooir Vannin offshore array area was refined from approximately 253 km² to 211 km², a reduction of approximately 17%. This resulted in a reduction of 13% of WTCs and setback the order limits from the gap to 1.6 nm. Resulting in a total gap of 4.1 nm between the two projects. A summary of the two projects' refinements is provided below in Table 1.

Table 1: Summary of Morgan OWF and Mooir Vannin's boundary refinements since scoping

Parameter	Mooir Vannin			Morgan		
	Scoping	Application	Change	Scoping/PEIR	Application	Change
Array area	253km ²	211km ²	17%	322km ²	280km ²	13%
WTCs	100	87	13%	107	96	10%
Setback from gap	-	1.6nm	-	-	1.1nm	-

1.4 Current position regarding the Mooir Vannin – Morgan gap

- 1.4.1.1 The displacement of the Steam Packet routes to/from Douglas Harbour is independent of the presence of Mooir Vannin, noting that the distance between Mooir Vannin and the mean position of the current route is 2.7nm (northern option) and 3.8nm (southern option), as illustrated in Figure 2. Based on consultation feedback from the Isle of Man Steam Packet Company this passing distance from Mooir Vannin in isolation is considered within As Low As Reasonably Practicable (ALARP) for safe passage by vessels operating on the route.
- 1.4.1.2 The presence of Morgan OWF and its interaction with the routes causes the passing distance from Mooir Vannin to decrease, i.e., pushing vessels closer to Mooir Vannin, and resulting in regular transit use of the gap between Mooir Vannin and Morgan (the 'Mooir Vannin-Morgan gap').
- 1.4.1.3 Based on consultation feedback principally from the Isle of Man Steam Packet Company, which has raised concerns with increased collision and allision risk due to the reduced navigable sea room when transiting through the Mooir Vannin-Morgan gap, both Mooir Vannin and Morgan OWF have sought to independently refine their respective sites to maximise the width of the gap, as described in section 1.3 above.

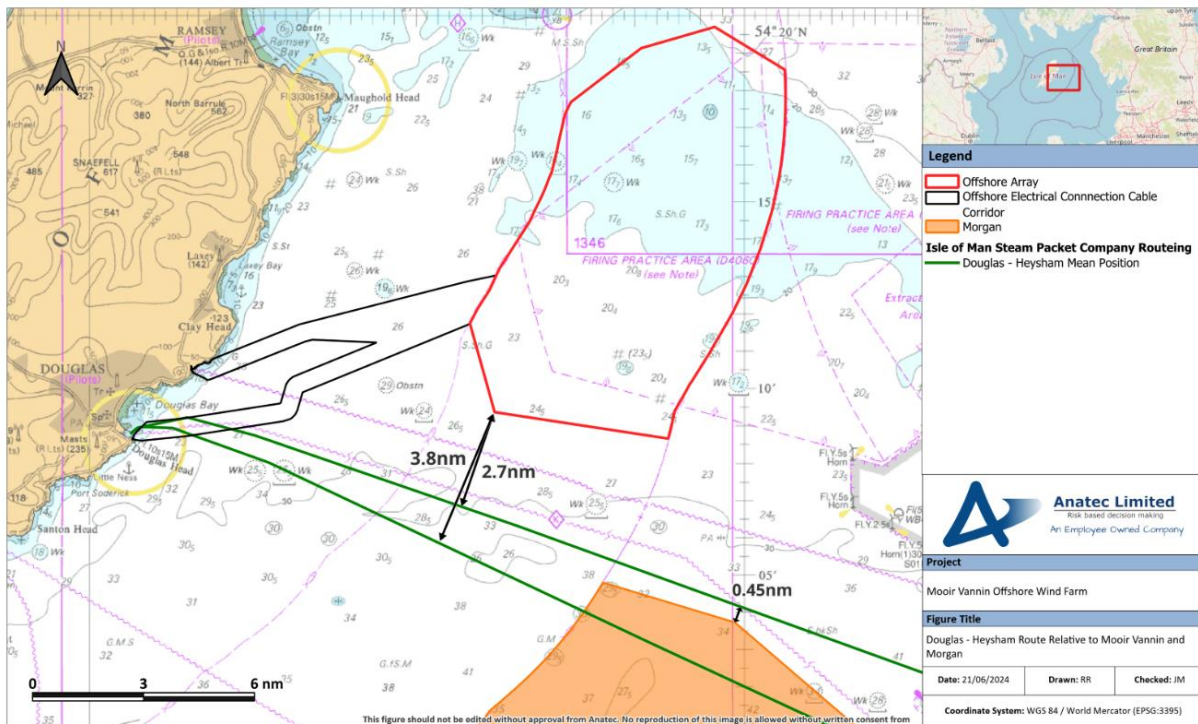


Figure 2: Moir Vannin and Morgan OWF distance from mean Douglas-Heysam routes

- 1.4.1.4 Moir Vannin have assessed that the 4.1nm gap between the Morgan Array Area and Moir Vannin Array Area is compliant with the Shipping Route Template (MGN 654 Annex 2) and PIANC guidance (full round turn). However, noting that the gap has only a singular narrowest point and no consistent surface piercing structures to both port and starboard, i.e., is not a designated navigational corridor, it is not considered necessary to directly apply the PIANC guidance.
- 1.4.1.5 Consultation feedback received since the refinement of Moir Vannin has indicated that the now minimum 4.1nm Moir Vannin-Morgan gap remains insufficient. This includes comments at the Moir Vannin Hazard Workshop in December 2024, at which Morgan OWF representatives were present.
- 1.4.1.6 Moir Vannin consider the 4.1 nm gap compliant with relevant guidance. However note that the responsibility for any further increase to the width of the Moir Vannin-Morgan gap lies with Morgan OWF. This view is based on two key elements:
 - Significant site refinement has already been undertaken by Moir Vannin which outweighs the equivalent site refinement undertaken by the Morgan OWF. As such an equitable and proportional approach to increasing the width of the Moir Vannin-Morgan gap is considered reasonable and fair; and
 - The route interacts only with Morgan in the baseline environment and therefore the increased collision and allision risk is incurred by a route shift associated with the presence of the Morgan OWF array area rather than the Moir Vannin offshore array. Moir Vannin in isolation is deemed to be within ALARP parameters.
- 1.4.1.7 Moir Vannin consider the responsibility to assess the width of the Moir Vannin-Morgan gap to be both with Moir Vannin and Morgan OWF as part of their respective NRAs.

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