

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS AND MONA OFFSHORE WIND PROJECT

**Morgan Offshore Wind Limited's and Mona Offshore Wind Limited's
Response to Morecambe Offshore Windfarm: Generation Assets
Examining Authority's Written Questions (ExQ1)**

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Image of an offshore wind farm

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Acronym

Acronym	Description
DCO	Development Consent Order
LAT	lowest astronomical tide
MMMP	Marine Mammal Mitigation Protocol
MNEF	Marine Navigation Engagement Forum
UWSMS	Underwater Sound Management Strategy
UXO	Unexploded Ordinance

1 INTRODUCTION

- 1.1.1.1 This document provides Morgan Offshore Wind Limited's and Mona Offshore Wind Limited's response to the Morecambe Offshore Windfarm: Generation Assets Examining Authority's Written Questions (ExQ1).

2 MORGAN OFFSHORE WIND LIMITED'S AND MONA OFFSHORE WIND LIMITED'S RESPONSES TO WRITTEN QUESTIONS (EXQ1)

Table 2.1: Response to Morecambe Offshore Windfarm: Generation Assets ExQ1.

Reference	Question is addressed to	ExA Question	Morgan Offshore Wind Limited's response and Mona Offshore Wind Limited's response
1GEN7	Mona Offshore Wind Ltd Morgan Offshore Wind Limited	Interrelationship report on other infrastructure projects A Report on Interrelationships with Other Infrastructure Projects was submitted by the Applicant at Deadline 1 [REP1-078]. The applicants of the other named projects which are IPs in this Examination are asked to confirm the accuracy of the information and, if they feel it appropriate, provide comments on the content of the Report.	Morgan Offshore Wind Limited and Mona Offshore Wind Limited were provided an early draft by the Applicant to allow input and collaboration. As such Morgan Offshore Wind Limited and Mona Offshore Wind Limited are generally aligned on the overall content of the Report. It is noted that the Morecambe Offshore Windfarm Ltd Report follows a similar structure and has been informed by Morgan Offshore Wind Limited's Report.
1HRA29	Mona Offshore Wind Ltd Morgan Offshore Wind Limited The Applicant NE MMO	Co-ordination/communication between projects during construction to minimise effects The Applicant's 'Report on Interrelationships with Other Infrastructure Projects - Revision 01 (Volume 9)' [REP1-078] explains why the Applicant considers that a legal obligation to co-ordinate with other developments in the Irish Sea could impede delivery of the Morecambe OWF. Paragraph 86 of the report concludes that opportunities for coordination would be explored where relevant and in respect of project timescales as these develop further. In the absence of a legal obligation, explain what formal mechanisms exist to ensure that there would be meaningful engagement around coordination and that it would happen in a timely fashion. The ExA is particularly concerned about mechanisms to minimise the impact of noise on marine receptors at a cross project level. <u>To Mona Offshore Wind Ltd and Morgan Offshore Wind Limited</u> a) These IPs are invited to make comments in relation to the above and to point to any provisions set out within their respective applications which would provide such co-ordination.	In response to point a) Morgan Offshore Wind Limited and Mona Offshore Wind Limited do not consider that any coordination needs to be legally secured between the projects, for the reasons set out in Morgan Offshore Wind Limited's Interrelationships Report section 1.4 (REP4-016). Whilst there are no specific provisions within the draft DCO that links the projects within the Irish Sea to one another, there are mitigation measures proposed by Morgan Offshore Wind Limited and Mona Offshore Wind Limited that will ensure that it is implemented satisfactorily in relation to other projects. Mechanisms to ensure meaningful engagement include: <ul style="list-style-type: none"> The agreement between Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd in developing the Morgan and Morecambe Offshore Wind Farms: Transmission Assets which seeks to ensure efficient and timely development of the transmission assets for both projects in order to ensure connection of the generation assets in line with programme requirements.

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Reference	Question is addressed to	ExA Question	Morgan Offshore Wind Limited's response and Mona Offshore Wind Limited's response
		<p><u>To the Applicant, Mona Offshore Wind Ltd and Morgan Offshore Wind Limited</u></p> <p>b) While noting the issues identified in paragraph 43, should one (or more) of the other projects not proceed, could this be resolved by ensuring that any secured co-ordination was only relevant for those projects under implementation?</p> <p><u>To NE and MMO</u></p> <p>c) Would a mechanism to ensure co-ordination of OWF construction activities assist in reducing the cumulative effect of the Proposed Development with other projects and, if yes, do NE and MMO have examples of how such a mechanism would function and be secured?</p>	<ul style="list-style-type: none"> In terms the impact of noise on marine receptors, Morgan Offshore Wind Limited and Mona Offshore Wind Limited have committed to a number of measures to ensure that all key activity that has the potential to generate significant sound levels (namely, UXO clearance and percussive piling of foundations) will not result in significant effects for the project alone nor materially contribute to any cumulative or in-combination effects. These measures are principally a Marine Mammal Mitigation Protocol (MMMP) and an Underwater Sound Management Strategy (UWSMS) which will ensure the application of the most appropriate mitigation dependent on the specific final design detail. These documents have been developed in outline form at this stage and will be finalised and approved by the MMO post-consent. No further controls around coordination of underwater sound with other projects are therefore required, nor are any being sought from either Interested Parties or the ExA, within the Morgan Generation Assets Examination. Morgan Offshore Wind Limited and Mona Offshore Wind Limited have committed to continue with the Marine Navigation Engagement Forum (MNEF) for a minimum of 5 years post-consent (see Morgan Offshore Wind Limited Commitments register (Deadline 5 reference S_D5_14) and Mona Offshore Wind Limited Outline Vessel Traffic Management Plan F03 (REP6-028), which includes Morecambe Offshore Windfarm Ltd. <p>In response to point b), as noted above, Morgan Offshore Wind Limited and Mona Offshore Wind Limited maintains that no legal obligation for coordination needs to be secured between the projects, for the reasons set out in Morgan Offshore Wind Limited's Interrelationships Report section 1.4 (REP4-016). Mitigation measures will be secured and delivered for each separate project under their respective consents.</p>

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Reference	Question is addressed to	ExA Question	Morgan Offshore Wind Limited's response and Mona Offshore Wind Limited's response
100I1	Ørsted IPs Mona Offshore Wind Limited Morgan Offshore Wind Limited Scottish Power Renewables (WODS) Ltd	<p>Potential Wake Effects</p> <p>Table 17.10 of ES Chapter 17 [REP1-038] identifies the approximate distances between the Proposed Development and other offshore wind projects including proposed and operational wind farms. At Deadline 1, in response to the Action Points for ISH1, the Applicant submitted further details including the orientation, hub height and blade tip height of other offshore wind projects in the Irish Sea (Table 5.1 of [REP-1-086]).</p> <p><u>To the Applicant:</u></p> <p>a) Having regard to the orientation, wind direction and distance between the Proposed Development and the Mona Offshore Wind Project (10.56km to the WSW) as shown in Table 5.1 and Figure 5.1 of [REP-1-086] does the Applicant have any concerns regarding the potential impact of wake loss from that proposal on the Proposed Development? If not, please explain why this is the case?</p> <p><u>To the other IPs:</u></p> <p>b) Do the other referenced IPs agree that Table 5.1 accurately reflects the approximate distances, orientation and heights as provided by the Applicant? If not, please can the parties provide a similar table which shows the same information as it considers to be correct.</p> <p>c) Noting the distance between the proposed Mooir Vannin and existing Walney Extension OWF (as shown Table 5.1 and Figure 5.1 of [REP-1-086]), do the Ørsted IPs have concerns about potential wake loss effects from the Mooir Vannin proposal and, as the proposed operator of that project, can the parties confirm whether a wake loss assessment has been scoped in as part of the EIA for that application? If not, please can the parties explain why such an assessment is not considered necessary in that case?</p>	In response to point b), Morgan Offshore Wind Limited and Mona Offshore Wind Limited agrees that Table 5.1 reflects the approximate distances, orientation and heights for the Morgan Generation Assets and Mona Generation Assets and would clarify that the 204 m refers to maximum hub height above LAT.