MORECAMBE

Morecambe Offshore Windfarm: Generation Assets

The Applicant's Response to Secretary of State Letter and Request for Information (Consultation 3)

Appendix A: Consideration of Mooir Vannin Offshore Windfarm Environmental Impact Statement and East Irish Sea Transmission Project Scoping Report

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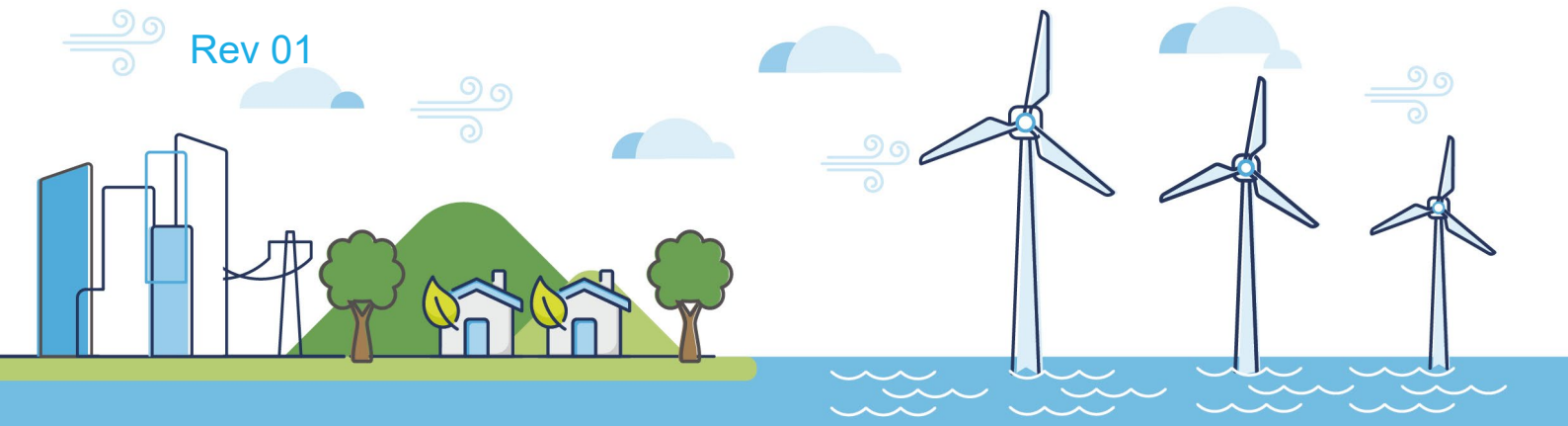

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1 Background

1. The application for the Development Consent Order (DCO) for the Morecambe Offshore Windfarm Generation Assets (the Project), includes, as part of the Environmental Impact Assessment (EIA), a Cumulative Effects Assessment (CEA) and, as part of Report to Inform Appropriate Assessment (RIAA), an in-combination assessment. Given the number of offshore windfarms concurrently in the planning process and all at different stages (i.e. scoping, PEIR, in examination or determination), it is normal practice for cumulative and in-combination assessments to have a cut-off point so that assessments can be finalised pre-application; this is consistent with the Planning Inspectorate Guidance Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment[1].

2. At the time of the DCO submission for the Project (31 May 2024), the Mooir Vannin Offshore Windfarm (MVOWF) application was at scoping stage. The MVOWF was considered in several chapters of the Project's EIA and RIAA using the high-level parameters provided in the Scoping Report[2]. There was no information in the public domain at this time in relation to the East Irish Sea Transmission (EIST) project, so this was not included within the cumulative or in-combination assessments.

3. The guidance also recognises that where new other existing and, or approved development comes forward following the cut-off date, the Examining Authority may request additional information in respect of effects arising. To address this during examination, Morecambe Offshore Windfarm Ltd (the Applicant) prepared a report on the interrelationships with other infrastructure projects. This was updated during the examination process with the last version submitted at Deadline 6 (REP6-030). During the examination there was no new information made available for the MVOWF, and therefore the status of this project in the report on the interrelationships with other infrastructure projects did not change. Similarly, there was no information regarding the EIST project made available during the examination.

4. On 21 August 2025, the Secretary of State (SoS) issued a letter and request for information (RFI) to the Applicant in relation to the status of several topics, one of which included the Cumulative Effects Assessment (CEA). Point 13 raised the following:

> *13. The Secretary of State notes that the application for Marine Infrastructure Consent for the Mooir Vannin Generation Project was due to be submitted in July 2025. The Secretary of State invites the* ***Isle of Man***

[1] Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK

[2] IMW01_Scoping_Report

> ***Government*** *and* ***Mooir Vannin Offshore Wind Farm Limited*** *to confirm whether any application has been made, and when any further environmental information relevant to the application may be made available. If further information is available now, the* ***Applicant*** *is requested to update the Cumulative Effects Assessment and In-Combination Assessment accordingly.*

5. At the time of the RFI, it was not publicised whether MVOWF had been accepted by the Isle of Man Government. However, the application was subsequently accepted by the Isle of Man Government, and the application documents made publicly available on 26 August 2025[3].

6. The Applicant responded to the RFI on 1 September 2025 with the following:

> *There has therefore been insufficient time to consider the substantial volume of application documents ahead of the 1 September deadline for responding to the Secretary of State. It is also considered that at this stage in the process for determining the Morecambe application, there would be very limited time for consultees (and the Secretary of State) to engage meaningfully with any new cumulative assessment submitted. Setting a 'cut-off' date for the continuous update of cumulative environmental assessment, to allow decisions on projects at a more advanced stage to be made, is recognised in the government's guidance "Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment"[4].*

7. Separately, on 14 August 2025, the Scoping Report for the EIST project was submitted to the Planning Inspectorate[5] by Ørsted East Irish Sea Transmission Limited. This project is intended to enable a portion of the renewable energy generated by the MVOWF to be exported to the UK via transmission cables.

8. In a letter issued on 26 September 2025, the SoS issued a further request for information:

> *The Secretary of State notes that the application for Marine Infrastructure Consent for the proposed Mooir Vannin Offshore Windfarm has been accepted for examination by the Isle of Man Government's Council of Ministers and the full application, including the Environmental Impact Statement, is now publicly available. The Secretary of State considers that Mooir Vannin Offshore Windfarm should be included within the cumulative assessment for the Proposed Development. The Applicant should update its Cumulative Effects Assessment and/or In-Combination Habitats Regulations Assessment ("HRA") and/or Report on*

[3] Application acceptance

[4] Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK

[5] https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0210008-000009-EN0210008%20East%20Irish%20Sea%20Transmission%20Project%20Scoping%20Report.pdf

Interrelationships with Other Infrastructure Projects in light of this newly available environmental information and should incorporate quantitative and qualitative data relating to the proposed Mooir Vannin Offshore Windfarm development.

The Applicant is invited to consider and explain whether the Scoping Report for the East Irish Sea Transmission Project contains sufficient information to facilitate a meaningful assessment of potential cumulative effects, and to update the Cumulative Effects Assessment and/or In-Combination HRA and/or Report on Interrelationships with Other Infrastructure Projects as necessary.

9. Therefore, to address the change in status of MVOWF and release of the EIST scoping report since the submission of the Application, the Applicant has prepared this report which should be read alongside the Report on Interrelationships with Other Infrastructure Projects (REP6-030). The project status and consenting timeframes, so far as they are known, for the MVOWF and EIST project are provided in **Table 1.1**. Indicative project construction and operation programmes are provided in **Table 1.2**.

Table 1.1 Project status and consenting timeframes

Project	Status (Deadline 6)	Date of Preliminary Environmental Information Report (PEIR)	Application submitted	Application accepted for Examination	Date of commencement of Examination	Date of Examination close	Consent Decision
MWOWF	Pre-submission*	N/A - but pre EIA consultation materials made available in July 2024**	28 July 2025[6]	26 August 2025	19 January 2026***	TBC	TBC
EIST	N/A****	TBC	TBC	TBC	TBC	TBC	TBC

** The application for the MVOWF was originally submitted during the examination, but was withdrawn at the request of the IoM government (with the original documents not having been made publicly available) and re-submitted on 28 July 2025*

*** Note that MVOWF is being consented under the IoM jurisdiction via a different process, i.e. a Marine Infrastructure Consent (MIC).*

**** The Council of Ministers announced a preliminary meeting date of 19 January 2026, this date may be subject to change and further information in relation to this meeting will be circulated nearer to the time.*

***** Scoping Report for the EIST project was submitted after Deadline 6, and the timeframe for the next stages of the application are unknown at this time.*

[6] 11-cover-letter.pdf

Table 1.2 Indicative project construction and operation programmes

Project	Indicative construction phase	Grid connection date	Expected start date of operation	Data source
MVOWF	2030-2033	2032-2033	2033	https://mima.gov.im/media/4uepfwid/a13-volume-a1-chapter-3-project-description.pdf
EIST	Earliest construction commencement in 2031	2037*	TBC	https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0210008-000009-EN0210008%20East%20Irish%20Sea%20Transmission%20Project%20Scoping%20Report.pdf

** There is no grid connection date within the EIST Scoping Report, the dates are taken from the National Energy System Operator Transmission Entry Capacity (TEC) register (Transmission Entry Capacity (TEC) register \| National Energy System Operator)*

2 Cumulative and in-combination impacts of the Project with other infrastructure projects

10. This section provides a review of the information within the MVOWF and EIST project applications and consideration of whether there is sufficient information to facilitate a meaningful assessment of potential cumulative effects.

11. **Table 2.1** provides an update to Table 8.2 of the Report on Interrelationships with Other Infrastructure Projects (REP6-030) which presents an update on the information available between the Project's DCO submission in May 2025 and the time of this response in October 2025, including the level of detail provided and a summary of key project changes.

12. A sensitivity analysis of the MVOWF project in relation to the Project's CEA is provided in **Section 2.1**. A consideration of the information within the EIST Scoping Report is provided as **Section 2.2**.

Table 2.1 Updated information available in the public domain since the Project's DCO submission in May 2025

Project	Status at Project DCO submission	Status as of 10 October 2025	Reference	Level of detail	Summary of key changes	Sensitivity review required?
MVOWF	Scoping	In determination ES and final ISAA available	Mooir Vannin Offshore Wind Farm Limited https://mima.gov.im/mooir-vannin/document-library/application-acceptance/environment-impact-statement/	High (change from low)	CEA Tier updated from Tier 2 to Tier 1 The following key changes were made to parameters used in the Project CEA: ▪ Reduction in site area from 253km^2 to 211km^2. ▪ Reduction in number of maximum turbines from 100 to 87 ▪ Reduced maximum blade tip height from 389m to 350m	Yes (see **Section 2.1**)
EIST	Pre-scoping, therefore not included	Pre-submission Scoping report available	Ørsted East Irish Sea Transmission Limited https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0210008-000009-EN0210008 East Irish Sea Transmission Project Scoping Report.pdf	Low	N/A Project is considered Tier 2.	No (see **Section 2.2**)

Table 2.2 Sensitivity test for the Project

Project	Potential for material change in cumulative and in-combination assessment conclusions															
	Marine Geology, Oceanography and Physical Processes	Marine Sediment and Water Quality	Benthic Ecology	Fish and Shellfish Ecology*	Marine Mammals	Offshore Ornithology	Commercial Fisheries*	Shipping and Navigation	Marine Archaeology and Cultural Heritage	Civil and Military Aviation and Radar	Infrastructure and Other Users	Seascape, Landscape and Visual Impact Assessment	Human Health	Socio-economics, Tourism and Recreation	Climate Change	Traffic and Transport
MVOWF	No (a)	No (a)	No (a)	Yes(b)	Yes(b)	Yes(b)	Yes(b)	Yes(b)	No (a)	Yes(b)	No (a)	Yes(b)	No (c)	Yes(b)	No (d)	No (a)

a) Screened out of MVOWF CEA as there are no pathways for effect with the Project. Therefore, there is no potential for material change in cumulative and in-combination assessment conclusions.

b) See **Section 2.1**

c) Project effects to receptors in Isle of Man were not identified in the Human Health chapter at a level where significant cumulative effects could arise. Therefore, no potential for material change in cumulative assessment conclusions.

d) A cumulative assessment was/would not be carried out, as standard for climate change chapters.

**Note that Fish and Shellfish Ecology, and Commercial Fisheries are covered under the 'Fish and Fisheries' chapter for MVOWF*

2.1 Mooir Vannin Offshore Windfarm

13. The documents for the MVOWF were made public by the Isle of Man government on 26 August 2025, four months after the close of the examination for the Project, 14 months after the application for the Project was accepted for examination, and 15 months after the application was submitted to the Planning Inspectorate.

14. The Applicant has reviewed the following documents from the MVOWF Environmental Impact Statement (EIS):

- Volume A1 Chapter 3 Project Description
- Volume A2 Chapter 3 Offshore and Intertidal Ornithology
- Volume A2 Chapter 4 Benthic Subtidal and Intertidal Ecology
- Volume A2 Chapter 5 Marine Mammals
- Volume A2 Chapter 6 Fish and Fisheries
- Volume A2 Chapter 7 Shipping and Navigation Risk Assessment Part 1
- Volume A2 Chapter 7 Shipping and Navigation Risk Assessment Part 2
- Volume A2 Chapter 8 Seascape, Landscape and Visual Impact Assessment
- Volume A2 Chapter 10 Military and Civil Aviation
- Volume A2 Chapter 14 Socio-economics, Tourism and Recreation
- Volume A2, Chapter 17 Onshore Impact Assessment
- Volume 3, Annex 5.2 Cumulative Effects Assessment Methodology
- Volume 4 Annex 5.2 Marine Mammal CEA Tables
- Volume 4 Annex 16.3 Transboundary Protected Sites Assessment – Ornithology.

2.1.1 Project Description

15. The MVOWF is situated within the territorial waters of the Isle of Man, approximately 11 km offshore from the Manx coastline. The MVOWF is approximately 45km from the Project. The development will comprise wind turbine generators, array and interlink cables, offshore platforms, and offshore export cables, including electrical connection cables extending to transition joint bays located within the designated landfall zones on the Isle of Man.

16. Table 2 of Volume A1 Chapter 3 Project Description of the MVOWF EIS summarises the key design changes from Scoping to PEI, and from PEI to Application. As the PEI was used in the Project CEA only the changes from PEI to Application are relevant and considered further. Those parameters where there was a change, and which are used in the Project CEA are presented below in **Table 2.3**.

Table 2.3 Change in parameters of MVOWF between PEI and Application

Parameter	PEI	Application
Size of the Offshore Array	253km^2	211km^2
Number of WTGs	100	87
Blade tip height above Lowest Astronomical Tide (LAT)	389m	350m
WTG rotor diameter	320m	296m
Number of Offshore Platforms	5	3
Number of interlink cables	5	2

17. All of the changes from PEI to Application have been reductions which would result in lesser effects than those assessed in the PEI and used in the Project CEA. In terms of the Project CEA only the size of the offshore array, number of WTGs and blade tip height above LAT were used in any of the assessments.

18. The indicative high level construction programme for the MVOWF shows that construction works would commence as early as Q2 2030, with the offshore infrastructure construction window being between Q4 2031 to Q3 2033 (Mooir Vannin Offshore Windfarm Limited (MVOWL), 2025a). Therefore, if the MVOWF project gets consented, it would not overlap with construction of the Project, which would be operational at that point.

2.1.2 Cumulative Effects Assessment Methodology

19. The Project was screened out for the following topics for the MVOWF CEA and in-combination assessment, and therefore there is no potential for a material change in the CEA and in-combination assessment conclusions for the Project:

- Marine geology, oceanography and physical processes
- Benthic subtidal and intertidal ecology
- Marine Sediment and Water Quality
- Marine Archaeology and Cultural Heritage
- Other Marine Users and Activities.

20. A CEA was not carried out for climate change chapters, as the standard approach for this topic is not to include CEA.

21. Topics which were screened into the CEA for potential cumulative effects between the Project and MVOWF are addressed below.

2.1.3 Fish and Shellfish Ecology and Marine Mammals

22. At the time of the Project's DCO submission, the Project considered that construction of MVOWF would not occur at the same time as the Project and so there would be no cumulative noise effects to fish and shellfish, and marine mammal receptors associated with concurrent piling activities. As noted in **Section 2.1.1**, the indicative high level construction programme for the MVOWF shows that construction works would commence as early as Q2 2030, with the offshore infrastructure construction window being between Q4 2031 to Q3 2033 (Mooir Vannin Offshore Windfarm Limited (MVOWL), 2025a). Therefore, if the MVOWF project gets consented, it would not overlap with construction of the Project, which would be operational at that point. Thus, the conclusions of the Project's fish and shellfish and marine mammals CEA and in-combination assessment remain unchanged and are considered to remain current and robust. It should be noted that cumulative effects will be reconsidered in the Underwater Sound Management Strategy (REP5a-042) post-consent, as required, to refine and agree required mitigation.

2.1.4 Offshore Ornithology

23. At the time of the Project's DCO submission, an assessment of cumulative and in-combination effects with MVOWF was not undertaken as the MVOWF PEI did not include ornithological information that could be included in the Project's CEA or in-combination assessment.

24. **Section 2.1.4.1** and **Section 2.1.4.2** provide a sensitivity analysis of the MVOWF offshore ornithology information at the EIA and HRA scales respectively, and whether the CEA and in-combination assessment remain current and robust.

2.1.4.1 Cumulative Effect Assessment (EIA)

25. **Table 2.4** presents the cumulative displacement numbers for ornithology receptors during the operation and maintenance phase used for MVOWF and the Project cumulatively and alone, and the conclusion of significance for key species.

26. **Table 2.5** presents the cumulative collision mortality for ornithology receptors during the operation and maintenance phase and whether the MVOWF conclusion would lead to a change in significance of effect for the Project's CEA.

Table 2.4 Cumulative Displacement (total population at risk, not mortality)

Species	The Project alone	MVOWF alone	The Project Cumulative	MVOWF Cumulative*	The Project conclusion	MVOWF conclusion	Significant?
Guillemot	14,689	4,419	96,378	188,079	Minor adverse	Neutral or slight adverse	No
Razorbill	1,979	2,136	15,768	44,926	Minor adverse	Slight adverse	No
Red-throated diver	20	168	256	1,222	Minor adverse	Slight adverse	No
Manx shearwater	8,972	1,431	32,688	44,181	Negligible	Negligible	No
Gannet	673	500	7,687	10,699	Minor adverse	Negligible	No

** Note that the MWOWF assessment includes a number of projects not included in the Project CEA, hence the larger cumulative values*

Table 2.5 Cumulative collision mortality (per annum)

Species	The Project alone	MVOWF alone	The Project Cumulative	MVOWF* Cumulative	The Project conclusion	MVOWF conclusion	Significant?
Kittiwake	25.5	46.9	562.8	918.2	Minor adverse	Slight adverse	No
Great black-backed gull	1.8	1.5	161.0	280.0	Moderate adverse	Slight or moderate adverse	Yes (for moderate adverse)
Herring gull	4.2	9.7	254.2	493.1	Minor adverse	Slight adverse	No
Lesser black-backed gull	3.6	2.8	279.5	304.8	Minor adverse	Slight adverse	No
Gannet	1.3	5.0	50.1	75.5	Minor adverse	Slight adverse	No

** Note that the MWOWF assessment includes a number of projects not included in the Project CEA, hence the larger cumulative values*

27. For all species, the conclusions for the cumulative assessment for MWOWF are of no greater significance than for the Project. Therefore, it can be concluded that the inclusion of MVOWF would make no difference to the conclusions of the Project's offshore ornithology CEA.

2.1.4.2 In-combination assessment (HRA)

28. **Table 2.6** presents the conclusions of the in-combination assessment for the Project and MVOWF (taken from Volume 4, Annex 16.4: Transboundary Protected Sites Assessment Screening (Mooir Vannin Offshore Windfarm Limited, 2025b)), focussed on key Special Protection Areas (SPAs) assessed within the Projects Report to Inform Appropriate Assessment (REP5a-009).

Table 2.6 MVOWF in-combination assessment conclusions for key SPAs considered in the Project's assessment (Table 10.1 of RIAA (REP5a-009))

SPA	Feature	Effect	The Project conclusion (in-combination)	MVOWF conclusion (in-combination)
Liverpool Bay SPA	Red-throated diver	Disturbance/displacement/barrier effects (construction and decommissioning, operation and maintenance)	**No AEoI***	Assessed for indirect effects on prey availability only. No AEoI concluded (no specific in-combination assessment undertaken)
	Common Scoter	Disturbance/displacement/barrier effects (construction and decommissioning, operation and maintenance)	**No AEoI**	Screened out
	Little gull	Collision risk (operation and maintenance phase)	**No AEoI**	Not assessed
	Common tern	Although initially screened in, it was concluded that common terns present at the windfarm site are very unlikely to be associated with the Liverpool Bay SPA population	**No AEoI**	Screened out
Morecambe Bay and Duddon Estuary SPA and Ramsar site	Lesser black-backed gull	Collision risk (operation and maintenance phase)	**No AEoI***	No contribution to in-combination effects (project alone mortality 0.44)
	Herring gull	Collision risk (operation and maintenance phase)	**No AEoI**	No contribution to in-combination effects (project alone mortality 0.19)
	Sandwich tern	Although initially screened in, it was concluded that Sandwich terns present at the windfarm site are very unlikely to be associated with the Morecambe Bay	**No AEoI**	Screened out

SPA	Feature	Effect	The Project conclusion (in-combination)	MVOWF conclusion (in-combination)
		and Duddon Estuary SPA and Ramsar site population		
Ribble and Alt Estuaries SPA and Ramsar site	Lesser black-backed gull	Collision risk (operation and maintenance phase)	**No AEoI***	No contribution to in-combination effects (project alone mortality 0.72)
Anglesey Terns/Morwen oliaid Ynys Môn SPA	Sandwich tern	Although initially screened in, it was concluded that Sandwich terns present at the windfarm site are very unlikely to be associated with the Anglesey Terns/Morwenoliaid Ynys Môn SPA population	**No AEoI**	Screened out
Glannau Aberdaron ac Ynys Enlli/Aberdaron Coast and Bardsey Island SPA	Manx shearwater	Disturbance/displacement/barrier effects (operation and maintenance)	**No AEoI**	No contribution to in-combination effects (project alone mortality <1)
Copeland Islands SPA	Manx shearwater	Disturbance/displacement/barrier effects (operation and maintenance)	**No AEoI**	No contribution to in-combination effects (project alone mortality <1)
Ailsa Craig SPA	Gannet	Disturbance/displacement/barrier effects and collision risk (operation and maintenance)	**No AEoI**	No AEoI In-combination mortality estimated 33.66 birds (Morecambe=25 birds)
Skomer, Skokholm and	Manx shearwater	Disturbance/displacement/barrier effects (operation and maintenance)	**No AEoI**	No contribution to in-combination effects (project alone mortality <1)

SPA	Feature	Effect	The Project conclusion (in-combination)	MVOWF conclusion (in-combination)
the Seas off Pembrokeshire /Sgomer, Sgogwm a Moroedd Penfro SPA				
Grassholm SPA	Gannet	Disturbance/displacement/barrier effects and collision risk (operation and maintenance)	**No AEoI**	No contribution to in-combination effects (project alone mortality 0.56)

** Natural England disagrees with this conclusion, however, the Applicant has presented a Without Prejudice compensation case (REP5a-046 and REP5a-011)*

29. The Mooir Vannin Transboundary Protected Sites Assessment (MVOWL, 2025b) has concluded no AEoI for all SPAs, including those assessed by the Project. In the majority of cases, MVOWF has concluded that its contribution is too small to require consideration of in-combination effects. For the gannet feature of Ailsa Craig SPA, the in-combination mortality (which includes the Project) is below 1% increase in background mortality.

30. For lesser black-backed gull from Morecambe Bay and Duddon Estuary and Ribble and Alt Estuaries SPAs, MVOWF has concluded that it would not contribute to in-combination effects. However, it is noted that the predicted mortality for MVOWF is higher than that predicted for the Project (0.44 vs 0.33 and 0.72 vs 0.69 respectively). This would be unlikely to affect Project conclusions, noting that the Project has also argued that it would not contribute to in-combination effects. Although NE does not concur with this conclusion, the conclusion for the Project would be unchanged. It is noted that the Project has provided without prejudice compensation proposals for lesser black-backed gull (REP5a-011). Therefore, should the SoS conclude that AEoI cannot be ruled out for this species, these measures would ensure that the Project would not contribute to in-combination effects.

2.1.4.3 Conclusion

31. The conclusions of the Project's offshore ornithology CEA and in-combination assessments therefore remain unchanged and are considered to remain current and robust.

2.1.5 Commercial Fisheries

32. At the time of the Project's DCO submission, the CEA included the scoping boundary of MVOWF as a Tier 2 project, acknowledging the effects on the scallop fishery. MVOWF was considered as part of the driver of the conclusion of a moderate adverse effect (significant in EIA terms) with regard to displacement of commercial fishing vessels in the Irish Sea. This assessment was considered precautionary as it did not include evolved mitigation measures that Morgan, Mona or MVOWF may implement and it also included the larger scoping boundary of MVOWF. It is noted that the changes identified in **Table 2.3** include a reduction in the maximum number of turbines and a reduction in array area. Therefore, there is no potential for a change to the CEA conclusions as the Project assessed a larger array boundary for MVOWF at DCO submission.

33. MVOWF included the Project in their CEA regarding a reduction in access to, or exclusion from established fishing grounds. The MVOWF CEA similarly concluded a moderate adverse (significant in EIA terms) effect to the Isle of Man and UK dredge, demersal, otter trawl and potting receptor, and a slight

adverse (not significant in EIA terms) effect on all other fleets. MVOWFL are committed to implementing a Fisheries Liaison and Co-existence Plan (FLCP) to reduce the significant effects, as well as thorough engagement with the commercial fishing industry and other windfarm developers prior to construction commencing and therefore concluded an overall residual effect of 'slight adverse' (not significant in EIA terms).

34. The Applicant is committed to ongoing communication with other developers including the Morgan and Mona Offshore Wind Projects, the Morgan and Morecambe Offshore Windfarms: Transmission Assets and the MVOWF project developers. The Applicant would adhere to a FLCP and would seek to liaise with these projects in order to develop a consistent approach in fisheries liaison, coexistence and mitigation. Any mitigation from MVOWF would therefore further reduce the potential for cumulative effects.

35. No updates to the assessment are considered to be required, given the assessment is suitably precautionary. The conclusions of the Project's CEA therefore remain unchanged and are considered to remain current and robust.

2.1.6 Shipping and navigation

36. At the time of the Project's DCO submission, MVOWF was included in an addendum to the Cumulative Regional Navigation Risk Assessment (CRNRA), noting that there would be an unacceptable risk to navigation safety between Morgan and the MVOWF due to the gap between Morgan and MVOWF. This assessment was considered precautionary as it did not include evolved mitigation measures that Morgan, Mona or MVOWF may implement and it also included the larger scoping boundary of MVOWF (**Table 2.3**).

37. It should be noted that the 2.7nm gap between MVOWF and Morgan has been increased to 4.1nm (MVOWL, 2025c). In Morgan's consent decision letter[7], the SoS agreed with the Examining Authority (ExA) that, in relation to the gap between Morgan and MVOWF, and noting conclusions from the Maritime and Coastguard Agency (MCA) and IoM Steam Packet Company (IoMSTC), navigational safety risks can be controlled to tolerable and ALARP. Regardless, given the location of MVOWF, the Project is not considered to contribute to the cumulative effects with the MVOWF.

38. The MVOWF NRA noted that "*only Morecambe would create any additional deviations to main routes identified in isolation. The routes affected by Morecambe are Routes 1, 4, and 13. Apart from Route 4, which is only deviated in the presence of cumulative developments, the other routes are*

[7] EN010136-001169-Morgan Offshore Wind Project Generation Assets Secretary of State for Energy Security and Net Zero Decision Letter.pdf

already deviated in isolation and the presence of Morecambe creates further waypoints but the additional overall increase in route length is not significant. There is ample sea room available surrounding Morecambe for vessels to deviate if required and would not compromise navigational safety. These deviations are also not in proximity to the Proposed Development and so if taken forward, would not impact vessels in proximity to the Offshore Array".

39. With additional mitigation measures applied, the MVOWF CEA concluded that the residual significance of risk on a cumulative level was 'Tolerable with Mitigation and ALARP', which is not significant in EIA terms.

40. No updates to the assessment are considered to be required, given the assessment is suitably precautionary. The conclusions of the Project's CEA therefore remain unchanged and are considered to remain current and robust.

2.1.7 SLVIA

41. At the time of the Project's SLVIA, MVOWF was considered as a Tier 2 project within the CEA (100 turbines with a maximum blade tip height of 389m), and was presented in the wirelines within Figure 18.24 to 18.47 (APP-109 – APP-135) (however the WTG layout was not accurate due to its status at the time of submission).

42. MVOWF was scoped out of the CEA for Merseyside, North-West England and North Wales due to the distance of MVOWF from these areas. The Isle of Man was scoped out of the detailed assessment for the Project's CEA due to the distance of the Project from the Manx coastline (63.1km), which is outside the SLVIA study area.

43. It is noted that the changes identified in **Table 2.3** include a reduction in number of maximum turbines, a reduction in array area (and therefore the lateral spread of turbines), reduction in number of OSPs from 5 to 3 and a reduced blade tip height from 389m above LAT to 350m above LAT. Therefore, there is no potential for a change to the CEA conclusions as the Project assessed a precautionary number of WTGs at DCO submission.

44. The MVOWF SLVIA identified cumulative effects to the Isle of Man, however this was largely as a result of the proximity of the Morgan Offshore Wind Project Generation Assets to the Isle of Man, with "*no additional cumulative effects with the Mona Offshore Wind Project or Morecambe Offshore Windfarm from the Manx coastline*" (MVOWL, 2025d).

45. Therefore, given the separate effects of the MVOWF and the Project on different coastlines, there are limited cumulative effects and the conclusions of the Project's CEA and in-combination assessments remain unchanged and are considered to remain current and robust.

2.1.8 Civil and Military Aviation

46. At the time of the Project's DCO submission, the Project's Civil and Military Aviation and Radar CEA stated that the MVOWF is in such proximity to the Project, that effects could impact the same receptors and require similar mitigations. However, there was no detailed assessment undertaken at the time of the Project's application submission as it was expected that mitigations would be proposed as required for MVOWF.

47. In the MVOWF Military and Civil Aviation chapter (MVOWL, 2025), the Project is screened into the CEA as a Tier 1 project with potential cumulative effects from radar, obstacle and increased air traffic impacts. The CEA concluded that no significant effects are anticipated as the MVOWF (and other planned projects) will adhere to national and international flying procedures, radar mitigations, additional agreed mitigation plans, reliance on pilots who are required to avoid any obstacle by legislated minimum distances, and a consideration of charted obstacles.

48. Therefore, no significant cumulative effect with the MVOWF and the Project are anticipated.

2.1.9 Socio-economics, tourism and recreation and Human Health

49. At the time of the Project's DCO submission, the Project's socioeconomics and human health CEAs acknowledged MVOWF in terms of potential indirect cumulative effects to shipping and navigation, but identified that the Project did not materially contribute to effects on the IoM, which are more driven by MVOWF and Morgan Offshore Wind Project Generation Assets and Mona Offshore Wind Project.

50. In the MVOWF Socio-economics, Tourism and Recreation chapter (MVOWL, 2025f), the Project is screened into the CEA as a Tier 2 project with potential temporal and spatial overlap with the project. The MVOWF CEA concluded that the Project is not expected to lead to direct effects on employment and Gross Value Added (GVA) within the IoM. With regard to the cumulative effect on the volume and value of tourism within the Isle of Man (associated with the significant effects in terms of cumulative visual impacts), the significance of effect was found to be slight adverse (not significant in EIA terms). As noted above in **Section 2.1.5** however, this is associated with the cumulative effect of Morgan with the MVOWF, with "*no additional cumulative effects with the Mona Offshore Wind Project or Morecambe Offshore Windfarm from the Manx coastline".*

51. The Project was screened out of the MVOWF Human Health assessment (presented in the Onshore Assessment (MVOWL, 2025g)) due to no physical effect-receptor overlap.

52. Therefore, the conclusions of the Project's CEA and in-combination assessments remain unchanged and are considered to remain current and robust.

2.2 East Irish Sea Transmission Project

53. The Applicant has reviewed the EIST EIA Scoping Report published by Ørsted East Irish Sea Transmission Limited on 14 August 2025.

54. The EIST project is entirely situated within English territorial waters and onshore in England, and will supply energy generated by MVOWF to the National Grid. From the MVOWF the scoping boundary runs northwest to southeast to a point approximately 10km northeast of the Project's Order Limits. From this point the Scoping Report presents two options for the offshore export cable corridor, landfall and onshore export cable corridor.

55. The northern route option runs west to east making landfall on the Lancashire coast between Fleetwood and Cleveleys; this option does not pass any closer to the Project's Order Limits.

56. The EIST project scoping boundary for the southern landfall option passes approximately 3km to the east of the Project at its closest point with no physical/direct overlap with the Project's Order Limits. There is an overlap with the Morgan and Morecambe Transmission Assets (Transmission Assets) DCO which is currently in Examination, with the southern route option presented for the offshore export cable for the EIST project crossing through the Order Limits for the Transmission Assets.

57. The EIST project will comprise up to four offshore export cables and 12 onshore export cables, up to three offshore booster stations and up to one onshore booster station, an onshore substation and electrical balancing infrastructure (Orsted East Irish Sea Transmission Limited, 2025).

58. The anticipated DCO application submission date for the EIST project is Q3 2027 (Orsted East Irish Sea Transmission Limited, 2025). A high-level construction programme indicates that offshore construction is scheduled to take place between Q4 of Year 3 and Q3 of Year 5 which, assuming that the EIST is submitted in Q3 2027 and consented by end of Q4 2028, would mean construction taking place between Q4 2031 and Q3 of 2035 at the earliest, by which time the Project would be operational. Additionally, the Applicant notes that the grid connection date for the EIST project at the Penwortham Substation is given by the National Energy System Operator (NESO) as 30 October 2037[8], which is significantly later than any of the dates within the Scoping Report.

[8] There is no grid connection date within the EIST Scoping Report, the dates are taken from the National Energy System Operator TEC register (Transmission Entry Capacity (TEC) register | National Energy System Operator)

59. The information in relation to the description of the development included within the Scoping Report for the EIST, including the approach adopted of having two options for landfall, with their associated separate and broad offshore export cable corridors, means that it is not possible to undertake a meaningful assessment of the potential cumulative effects, given the large amount of uncertainty of the final design, and therefore associated impact, inherent such an adopted approach.

3 Conclusion

60. The Applicant has reviewed the MVOWF EIS and technical appendices, and the EIST Scoping Report in relation to the potential implications for the conclusions of the Project's ES and/or RIAA.

61. The Applicant concludes that there would likely be no change to any conclusions presented in the Project's CEA or in-combination assessments, with both assessments remaining current and robust.

62. Further detailed assessments will be captured by the EIST EIA (at both the PEIR and ES stage) and suitably mitigated.

4 References

MVOWL (2025a). Mooir Vannin Generation Project Environmental Impact Statement Volume A1 Chapter 3 Project Description

MVOWL (2025b). Mooir Vannin Generation Project Environmental Impact Statement Volume 4 Annex 16.3 Transboundary Protected Sites Assessment – Ornithology

MVOWL (2025c). Mooir Vannin Generation Project Environmental Impact Statement Volume A2 Chapter 7 Shipping and Navigation Risk Assessment

MVOWL (2025d). Mooir Vannin Generation Project Environmental Impact Statement Volume A2, Chapter 8: Seascape, Landscape and Visual Impact Assessment

MVOWFL (2025e). Mooir Vannin Generation Project Environmental Impact Statement Volume A2, Chapter 10: Military and Civil Aviation

MVOWL (2025f). Mooir Vannin Generation Project Environmental Impact Statement Volume A2, Chapter 14: Socio-economics, Tourism and Recreation

MVOWL (2025g). Mooir Vannin Generation Project Environmental Impact Statement Volume A2, Chapter 17: Onshore Impact Assessment

Orsted East Irish Sea Transmission Limited (2025). East Irish Sea Transmission Project Environmental Impact Assessment (EIA) Scoping Report