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Morgan Offshore Windfarm Generation Assets Case Team Planning Inspectorate morganoffshorewindproject@planninginspectorate.gov.uk (Email only)

MMO Reference: DCO/2022/00003
Planning Inspectorate Reference: EN010136
Identification Number: 20048964

03 October 2024

Dear Susan Hunt,

Planning Act 2008, BP Alternative Energy Investments Ltd, Proposed Morgan Offshore Windfarm Generation Assets Order

Deadline 1 Submission Summary

On 30 May 2024 the MMO received notice under Section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by bp Alternative Energy Investments Ltd, (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Morgan Generation Offshore Windfarm (the DCO Application) (MMO ref: DCO/2022/00003 PINS ref: EN010136).

The DCO Application seeks authorisation for the construction, operation, and maintenance of the Morgan Offshore Windfarm Generation Assets (MOWF) located approximately 22 kilometres (km) from the Isle of Man Coastline and approximately 37km from the Northwest coast of England; comprising of up to 96 wind turbine generators, all associated array area infrastructure, and all associated development in an area approximately 280 square kilometres (km²).

Two Deemed Marine Licences (DML) are included in the draft DCO. One in relation to Wind Turbine Generators (WTG) and Associated Infrastructure, and one for Offshore Substation Platforms and Interconnector Cables.

As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions drafted in a deemed marine licence enable the MMO to fulfil these obligations.

This document comprises the MMO's summary of the submission for Deadline 1. This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely



Liam Woods Marine Licensing Case Officer

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1. Comments on Relevant Representations from other Interested Parties

- 1.1. The MMO's Deadline 1 response contains detailed comments on the following Interested Parties, Relevant Representations:
 - Corporation of Trinity House of Deptford Strond (TH) (RR-009)
 - Environment Agency (EA) (RR-011
 - Historic England (HE) (RR-013)
 - Maritime and Coastguard Agency (MCA) (RR-019)
 - National Federation of Fishermen's Organisations (NFFO) (RR-24)
 - Natural England (NE) (RR-26)
 - North West Wildlife Trusts (NWWT) (RR-31)
 - Royal Society for the Protection of Birds (RSPB) (RR-35)
 - UK Chamber of Shipping (UKCOS) (RR-41)
- 1.2. The MMO will be reviewing the responses from the above Interested Parties (IPs) throughout examination and hopes to see issues between the above IPs and the Applicant resolved.

2. Comments on Pre-Examination Procedural Deadline Submissions

- 2.1. The MMO has reviewed the following documents submitted by the applicant:
 - PD1-006 Applicant's response to Relevant Representation from Marine Management Organisation: Fish and Shellfish 4.6.5 (Annex 3.1)
 - PD1-007 Applicant's response to Relevant Representations from Marine Management Organisation (RR-020): Underwater Sound (Annex 3.2)
 - PD1-008 Applicant's response to Relevant Representation from Marine Management Organisation: Fish and Shellfish 4.6.12 (Annex 3.3)
 - PD1-017 Applicant's Response to Relevant Representations
- 2.2. The MMO welcomes the submission of these documents and will provide further comments at Deadline 2.
- 2.3. Regarding PD1-017 the MMO has provided a response in tabular format contained within the Deadline 1 submission which provides the MMO's stance on points regarding the DCO and DML.
- 2.4. The MMO considers there to be several points that require amending within the DCO and DML.

3. Initial Statements of Common Ground (SoCG)

3.1. The MMO has worked with the Applicant to prepare a SoCG which will be submitted at Deadline 1. The MMO will continue to work with the Applicant outside of the written process to ensure issues are being moved to resolution where possible.

4. Comments from Issue Specific Hearing 1

4.1. The MMO has reviewed EV2-005 'Action Points Arising from Issue Specific Hearing 1' and will review the documents/updates to be submitted by the Applicant. The MMO has also provided a response regarding point five in document EV2-005.

5. Notification by Statutory Parties of their wish to be considered as an IP by the ExA

5.1. The MMO wish to be considered as an interested party by the ExA.

6. Notification of wish to have future correspondence received electronically

6.1. The MMO has requested that members of the case team be added to receive future correspondence electronically.

Yours sincerely



Liam Woods

Marine Licensing Case Officer

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