

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Annex 4.1 Applicant's Response to Hearing Action Point HAP_ISH1_10: Applicants response to the Meath County Council

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Image of an offshore wind farm

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.

Acronyms

Acronym	Description
CEA	Cumulative Effects Assessment
EPP	Evidence Plan Process
EIAR	Environmental Impact Assessment Reports
EWG	Expert Working Group
ISH1	Issue Specific Hearing 1
MNEF	Marine Navigation Engagement Forum
NISA	North Irish Sea Array

1 ANNEX TO RESPONSE TO HEARING ACTION POINTS: HAP_ISH1_10 TRANSBOUNDARY MATTERS 1

1.1 Introduction

- 1.1.1.1 This document has been prepared in response to Action Point 10 arising from the Issue Specific Hearing 1 (ISH1) which was held on 10 September 2024 in respect of the Morgan Offshore Wind Project: Generation Assets (hereafter Morgan Generation Assets).
- 1.1.1.2 Morgan Offshore Wind Ltd. ('the Applicant') has reviewed each of these action points.
- 1.1.1.3 Action Point 10 is set out in the Issue Specific Hearing 1 Action Points (document reference EV2- 005) and requires the applicant to:
- 1.1.1.4 *Provide a response to the Meath County Council submissions dated 10 September 2024, made in response to the second transboundary screening dated 3 July 2024.*
- 1.1.1.5 This document has been prepared in response to Meath County Council's submissions (OD-006).

1.2 Response

- 1.2.1.1 The Applicant welcomes Meath County Council's comments. The UK Government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030. Figures released by the Department for Business and Trade in 2023 show that the UK currently has 13.9 GW of installed offshore wind capacity (Department for Business and Trade, 2023). Therefore, the Morgan Generation Assets has a critical role to play – both in helping the UK achieve its net zero ambitions and, specifically, in reaching offshore wind generation goals. Further detail on this is provided in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (APP-009) The Applicant has provided responses to each of the points raised by Meath County Council below.

1.2.2 Cumulative Effects Assessment – renewables projects in the west Irish Sea

- 1.2.2.1 The Oriel, North Irish Sea Array (NISA) and Arklow Bank offshore wind projects have been considered as part of the Morgan Generation Assets application. They were categorised as tier 2 cumulative projects on the basis that no application had been published at the time of the assessment (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-012) for a description of cumulative project tiers). In accordance with section 3.4.9 of the Planning Inspectorate's advice note seventeen (Planning Inspectorate, 2019), the list of cumulative projects was finalised three months before submission of the Environmental Statement (on 24 January 2024).
- 1.2.2.2 The Applicant notes the likely significant effects from the Oriel and NISA offshore wind projects as identified in their Environmental Impact Assessment Reports (EIAR). All impacts and receptors scoped into the EIA for the Morgan Generation Assets have been assessed in the Environmental Statement (APP-008 to APP-063)
- 1.2.2.3 The Applicant notes the proposed mitigation to address likely significant effects from the Oriel and NISA offshore wind projects. Mitigation and monitoring commitments for

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the Morgan Generation Assets have been discussed with relevant statutory nature advisors and are set out in the Mitigation and monitoring schedule (APP-076).

- 1.2.2.4 Other offshore wind projects in the west Irish Sea (including Arklow Bank Phase 2, Dublin Array and Codling Wind Park) have been considered as part of the Morgan Generation Assets application. They were categorised as tier 2 cumulative projects on the basis that no application had been published at the time of the assessment (see Volume 1, Chapter 5: Environmental Impact Assessment Methodology (APP-012) for a description of cumulative project tiers). In accordance with section 3.4.9 of the Planning Inspectorate's advice note seventeen (Planning Inspectorate, 2019), the list of cumulative projects was finalised three months before submission of the Environmental Statement (on 24 January 2024). How each topic has considered Arklow Bank Phase 2, Dublin Array and Codling Wind Park offshore wind projects is presented in Volume 3, Annex 5.1: Cumulative effects screening matrix (APP-031).
- 1.2.2.5 Arklow Phase 2 is 107.6 km from the Morgan Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals on the basis of low data availability or no conceptual or physical effect-receptor pathway. Marine mammals include Arklow Phase 2 in the cumulative assessments (Volume 2, Chapter 4: Marine mammals (AS-010)).
- 1.2.2.6 Dublin Array is 134.4 km from the Morgan Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals on the basis of low data availability or no conceptual or physical effect-receptor pathway.
- 1.2.2.7 Codling Wind Park is 141.2 km from the Morgan Array Area and was screened out from the cumulative assessment for all topics apart from marine mammals on the basis of low data availability or no conceptual or physical effect-receptor pathway.
- 1.2.2.8 The assessments have considered all reasonably foreseeable interactions based on project information available at the time of the assessment.
- 1.2.2.9 The Applicant is currently undertaking a review of the material now available and will undertake a sensitivity check as to whether any new information could affect the cumulative assessment. This is part of a broader cumulative effects assessment (CEA) sensitivity analysis which will be submitted into the Examination. This analysis will supplement the CEA undertaken for the Morgan Generation Assets Application within the topic specific chapters in Volume 2 of the Environmental Statement (APP-013 to APP-027) to reflect any changes and resulting impacts.

1.2.3 Habitats Regulations Assessment

- 1.2.3.1 The HRA Stage 1 Screening Report (APP-099) identified eleven sites within the Republic of Ireland in the initial screening process for the assessment of LSE for Annex II marine mammals (Grey seal *Halichoerus grypus* and Harbour porpoise *Phocoena phocoena*). These sites were taken forward for determination of likely significant effect (LSE). The screening concluded potential LSE on the following sites which were taken forward for assessment:
- Rockabill to Dalkey Island SAC (Harbour porpoise)
 - Saltee Islands SAC (Grey Seal)
 - Roaringwater Bay and Islands SAC (Harbour porpoise)
 - Blasket Islands SAC (Harbour porpoise)
- 1.2.3.2 The HRA Stage 2 Information to support an appropriate assessment Part 2: Special areas of conservation assessments (APP-097) concluded that beyond reasonable

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scientific doubt, there is no risk of an adverse effect on the integrity of these sites from the Morgan Generation Assets either alone or cumulatively with other plans/projects.

1.2.4 Transboundary Impacts Screening – shipping and navigation

- 1.2.4.1 Section 7.12 of the Shipping and Navigation chapter (APP-025) states that the Morgan Generation Assets could impact upon vessels which are either internationally owned or operating between ports in different states, including the Republic of Ireland. These have been assessed throughout the NRA (APP-060) and consultation has been undertaken with regular runners operating between the UK and Republic of Ireland such as Stena Line and CLdN (as described in Table 7.4 of the Shipping and Navigation chapter APP-025). The Applicant notes that this approach is consistent with other offshore wind projects located adjacent to international boundaries.
- 1.2.4.2 The Morgan Generation Assets has considered shipping and navigation impacts from cumulative projects in the west Irish Sea. As presented in Volume 2, Chapter 7: Shipping and navigation (APP-025), the Morgan Generation Assets used a shipping and navigation study area of 10 nautical miles (nm) around the Morgan Array Area. In addition, the waters of the east Irish Sea to the south and east of the Isle of Man have been considered in terms of shipping routes and their interaction with the Morgan Generation Assets and existing and planned offshore wind projects within this area for cumulative effects assessment. The shipping and navigation study area was discussed and agreed with key stakeholders during pre-application consultation (See section 7.44 of Volume 2, Chapter 7: Shipping and navigation (APP-025)). West Irish Sea offshore wind projects were screened out from the shipping and navigation cumulative assessment on the basis of no conceptual or physical effect-receptor pathway (Volume 3, Annex 5.1: Cumulative effects screening matrix (APP-031)).

1.2.5 Timing of construction activities

- 1.2.5.1 The timings of the construction activities for proposed projects in the Irish Sea have been considered by each topic when screening projects into each cumulative effects assessment. Volume 3, Annex 5.1: Cumulative effects screening matrix (APP-031) presents the temporal overlap of each cumulative project with the Morgan Generation Assets. The assessments have considered all reasonably foreseeable interactions based on available project information at the time of the assessment. The majority of EIA assessment topics screened out west Irish Sea Projects on the basis of no conceptual or physical effect-receptor pathway. A screening distance of two tidal excursions has been used for potential cumulative increases in suspended sediments with other projects which represents where study areas for adjacent projects and developments, defined in a similar way, may intersect. This approach was consulted on, and agreed, with the Expert Working Group (EWG) established to advise on Benthic ecology, fish and shellfish and physical processes (Technical Engagement Plan (APP-094)) as part of the Evidence Plan Process (EPP) (Technical Engagement Plan Appendices Part 2 (APP-090)). The west Irish Sea projects lie outside two tidal excursions. Further detail is presented in Volume 2, Chapter 1: Physical Processes (APP-013).

1.2.6 Seascape, landscape and visual impacts

- 1.2.6.1 The Morgan Generation Assets has considered visual impacts from cumulative projects in the west Irish Sea. As presented in Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014), the Morgan Generation Assets used a seascape and visual resources study area of 50 km, which was based on an analysis

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of the Zone of Theoretical Visibility. This study area was based on best practice guidance (White Consultants, 2020). West Irish Sea offshore wind projects were screened out from the seascape and visual resources cumulative assessment on the basis of no conceptual or physical effect-receptor pathway.

- 1.2.6.2 With the exception of Lir Offshore Array, all west Irish Sea offshore energy projects are over 100 km away from the Morgan Generation Assets. Lir Offshore Array was screened out of the Seascape, landscape and visual resources assessment on the basis of limited data available on which to undertake an assessment (Volume 3, Annex 5.1: Cumulative effects screening matrix (APP-031)).

1.2.7 Consultation

- 1.2.7.1 The Applicant has undertaken extensive consultation throughout the pre-application phase with stakeholders and other developers (Consultation Report (APP-088)). The Applicant has engaged with shipping and navigation stakeholders and other developers throughout the pre-application period, primarily through the Marine Navigation Engagement Forum (MNEF). The MNEF was created early in the pre-application phase as a forum to discuss shipping and navigation matters with stakeholders and met six times between 2021 and 2024. The Applicant has committed within Volume 2, Chapter 7: Shipping and navigation (APP-025) to continue engagement with all stakeholders through the MNEF which, which includes offshore wind energy developers.

- 1.2.7.2 Commercial fisheries consultation with key local and regional fisheries stakeholders has been undertaken throughout the pre-application phase commencing in June 2021 and has consulted with representatives from Ireland and Northern Ireland including representatives from the following organisations: Irish South and East Fish Producers Organisation, Anglo-North Irish Fish Producers Organisation, and Northern Ireland Fish Producers' Organisation. The Applicant has undertaken a transboundary impacts screening (Volume 3, Annex 5.2: Transboundary Impacts Screening (APP-032)) which provides the screening assessment of the potential for transboundary impacts to occur on the environment or interests of other states as a result of the Morgan Generation Assets. A number of topics screened in potential transboundary impacts, and these were assessed in the relevant chapters of the Environmental Statement (see section 1.6 of Volume 3, Annex 5.2: Transboundary Impacts Screening (APP-032)).

1.2.8 Decommissioning

- 1.2.8.1 Section 105 of the Energy Act 2004 requires the Morgan Generation Assets to be decommissioned at the end of the operations and maintenance phase. No offshore decommissioning works will take place until a written decommissioning programme has been approved by the Secretary of State for the Department for Energy Security and Net Zero. In addition, Requirement 5 (Schedule 2, draft development consent order (AS-003)) requires a written decommissioning programme to be submitted to the Secretary of State prior to commencement of offshore works. The scope of the decommissioning works would be determined by the relevant legislation and guidance at the time of decommissioning.