



Morgan Offshore Windfarm Generation Assets Case Team
Planning Inspectorate
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(Email only)

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

27 February 2025

Dear Susan Hunt,

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

Deadline 6 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 Morgan Offshore Windfarm Generation Assets (MOWF) located approximately 22 kilometres (km) from the Isle of Man Coastline and approximately 37 km 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 6.

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

[Redacted signature block]

[Redacted name]

Marine Licensing Case Officer

[Redacted contact information]

1. Closing Statement

- 1.1. The MMO highlights that with the Applicant leaving some of the major issues for examination it has increased resource requirements during this process and some high priority issues remain unresolved, undermining the development consent order process.
- 1.2. The MMO would highlight that the Applicant has engaged with the MMO throughout the process with the aim to agree as much as possible.

2. Response to Applicants Response to Examiner's Questions 2 (ExQ2) (REP5-015)

- 2.1. The MMO has reviewed the responses from the Applicant to the questions raised by the ExA contained within ExQ2 and has provided a response in Table 1 of the Deadline 6 submission.
- 2.2. The MMO agrees with the majority of the Applicant's responses to ExQ2. The MMO, however does not agree with the Applicants response to questions surrounding Adaptive Management and Transfer of the Benefit of the Order. The MMO has provided a response in Table 1 of the Deadline 6 submission.

3. Response to the Report on the Implications for European Sites (RIES) (PD-011)

- 3.1. The MMO does not believe monitoring of SBP surveys in the In principle Monitoring Plan (IPMP) is required, noting the Applicant has already included mitigation measures within the Marine Mammal Mitigation Protocol (MMMP) (Marine Mammal Observers and Passive Acoustic Monitoring) and these align with the Joint Nature Conservation Committee (JNCC) guidelines. The MMO also notes Natural England (NE) is content there is no Adverse Effect on Integrity (AEoI).

4. Response to Action Points raised at Issue Specific Hearing 3 (ISH3)

- 4.1. The MMO has reviewed the recordings of ISH3 and the subsequent ExA action points document that followed. The MMO has provided full responses to these action points in table 3 of the Deadline 6 Submission.

5. The MMO's Position on the Environmental Statement

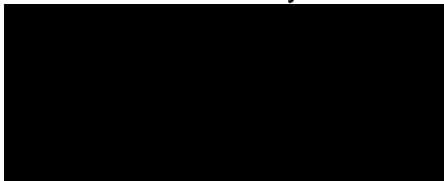
- 5.1. The MMO used this section to outline remaining concerns surrounding ecology.
- 5.2. The MMO considers that all concerns regarding impacts to benthic ecology, coastal processes and shellfisheries have been suitably addressed by the Applicant.

- 5.3. Regarding Underwater Noise (UWN) The MMO's position is Unexploded Ordnance (UXO) clearance should not be within the DML but notes if the SoS is minded to include UXO low order clearance, this would be a welcomed decision by the Applicant and notes the Applicant has accepted the risk of the timescale for a new licence for any required high order detonations at the time if required.
- 5.4. Regarding impacts to fisheries, in light of the Applicant's commitment to the use of two noise reduction systems for driven piling, during the herring spawning season, unless, through the UWSMS and following design refinement, the Applicant can demonstrate that a sufficient reduced overlap with the herring spawning grounds can be achieved through the application of a single noise reduction system to ensure no significant effects, the MMO is content that a temporal piling restriction for herring is no longer required on the DML.
- 5.5. The Applicant has also committed to the MMO being consulted throughout the development of the final Morgan UWSMS. The MMO is satisfied that this commitment ensures ongoing collaboration between the MMO and the Applicant to finalise an UWN mitigation approach which is acceptable and robust and applies appropriate measures.

6. Comments on the Draft DCO and DML (REP5-017)

- 6.1. The MMO has reviewed the draft DCO submitted by the Applicant at Deadline 5 (REP5-017) and has provided detailed comments in section 6 of the Deadline 6 Submission.
- 6.2. The MMO has been in direct contact with the Applicant regarding updates to the draft DCO and the MMO will look to see these updates at Deadline 6.

Yours sincerely



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