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On behalf of the Secretary of State for Energy Security and Net Zero
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(Email only)

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

03 July 2025

Dear [REDACTED]

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

Secretary of State (SoS) Request For Information Submission

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.

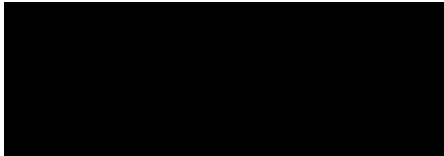
As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions drafted in a deemed marine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

This document comprises the MMO's comments SoS request for information.

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



Marine Licensing Case Officer

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1. Initial Comment Raised by The MMO at Deadline 6

- 1.1. On 27 February 2025, the MMO submitted the following comments into examination as part of its Deadline 6 Response regarding Schedule 2 Requirement 1 - Time limits /Lifespan

“The MMO has noted that on some offshore windfarms that the ES has not assessed a number of years during the Operation and Maintenance (O&M) phase. This is not the case for the Project. However, the MMO wanted to highlight to the ExA and SoS that there may be a benefit to including an end date of the O&M phase within the DCO and DML in relation to the lifespan of the project to ensure that it is clear that any repowering etc. would be subject to a new consent or variation. The MMO notes that Marine Licences have end dates for all construction and maintenance activities and there is a clear line when a new consent is required.

The MMO is still discussing a position internally and understand that it is too late to raise it with the Applicant but wanted to highlight to the ExA and SoS for consideration.”

2. Secretary of State’s Request for Further Information

- 2.1. On the 19 June 2025, the MMO received a letter from the SoS requesting further information to assist in reaching determination. The below request relates to comments outlined in point 1.1 above.

The MMO is invited to confirm whether it has reached a concluded position on the benefit of including an end date of the operational and maintenance phase within the DML, as it referred to in REP6-094, and if so, to propose draft wording to secure this in the DML.

3. MMO Response

- 3.1. The MMO has not yet reached a concluded position regarding end dates for operational and maintenance activities as per section 1.1. The MMO is continuing conversations internally, but these will likely continue past the SoS decision deadline.
- 3.2. Therefore, the MMO does not have any proposed wording to provide to the SoS.
- 3.3. The MMO does note that planning applications do not always have an end date for the maintenance of a project and notes for Morgan that the Applicant has confirmed a new assessment would be required if activities were to go past the assessed time scale within the Environmental Statement.
- 3.4. The MMO would welcome a review of any new or additional wording included in the DML for any reason prior to the decision to ensure full understanding at the post consent stage.

