



John Wheadon
Head of Energy Infrastructure Planning
On behalf of the Secretary of State for Energy Security and Net Zero
morganoffshorewindproject@planninginspectorate.gov.uk
(Email only)

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

28 July 2025

Dear John Wheadon,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010, BP Alternative Energy Investments Ltd, Proposed Morgan Offshore Windfarm Generation Assets Order

Secretary of State's (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).

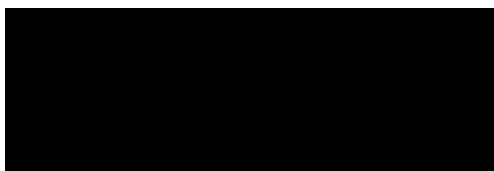
Two Deemed Marine Licences (DML) are included in the draft DCO. One in relation to Wind Turbine Generators (WTG) and Associated Infrastructure, and one for Offshore Substation Platforms and Interconnector Cables.

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 of the MMO's comments to the SoS request for information from various parties as requested by SoS on 19 June 2025, Deadline 1 August 2025.

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

D + [redacted]

E [redacted] marinemanagement.org.uk



1. SoS Request for Further Information

- 1.1. The SoS issued a letter requesting information from various interested parties on 19 June 2025 and set a deadline of 3 July 2025 for receipt of responses.
- 1.2. The SoS has now invited all interested parties to comment on the information provided in response to the information request of 19 June 2025.

2. MMO's response to Cumulative Effects Assessment

- 5.1 The MMO has reviewed responses to the Secretary of State's request for further information from the Applicant, Isle of Man Government and Mooir Vannin Offshore Wind Farm Limited. The MMO has no comments regarding cumulative effects following the formal withdrawal of Mooir Vannin Offshore Wind Farm Limited Marine Infrastructure Consent application on 10 June 2025.
- 5.2 Following the amendments to Marine Infrastructure (Consenting Process) Regulations 2024 on 16 June 2025 by the Department of Infrastructure, the MMO understands that Mooir Vannin Offshore Wind Farm Limited intends to resubmit its application at the earliest opportunity. Once submitted the MMO may provide comments during the submission and examination stages.

3. MMO's response to wake effects

- 3.1 The MMO has no comments regarding the technical aspects of wake effects, however notes the addition of a requirement for a Wake Effects Plan and this in turn leads to an update to Condition 20(1)(a) to include reference to this new requirement. The MMO has no concerns with this update.

4. MMO's response to commercial negotiations and agreements

- 4.1. The MMO has no comments regarding commercial negotiations and agreements due to being outside the MMO's jurisdiction.

5. MMO's response to Habitats Regulation Assessment ("HRA") matters

- 5.1 The MMO has reviewed responses to the SoS request for further information, dated 19 June 2025 on the Morgan Offshore Wind Project, from JNCC, Cyfoeth Naturiol Cymru / Natural Resources Wales, the Applicant and Natural England and the MMO has no further comments to add. The MMO defers to Statutory Nature Conservation Bodies (SNCBs) in relation to HRA and protected sites and features.
- 5.2 The MMO is content with the draft Marine Mammal Mitigation protocol (MMMP) and Underwater Sound Management Strategy (USMS) and approves these post consent in consultation with the SNCBs.



6. MMO's Response to Deemed Marine Licence ("DML")

- 6.1 As per MMO's response to SoS request for information letter dated 03 July 2025, 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.
- 6.2 Therefore, the MMO does not have any proposed wording to provide to the SoS.
- 6.1. 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.
- 6.2. 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.

Yours sincerely

Fiona Jeyes

Fiona Jeyes
Marine Licensing Case Officer
D +44 (0) 7387 042 460
E Fiona.jeyes@marinemanagement.org.uk

