

29th of July 2026

Dear Members,

We want to update Manx Wildlife Trust (MWT) Members and the wider public on the representations which we have made regarding the Mooir Vannin offshore wind farm proposal to the Examining Body to date.

This is a major proposal, and it is important that any decision properly considers Manx wildlife and its needs. MWT is not approaching this process as a simple question of being “for” or “against” the proposed development. It is important to explain that the marine consenting process does not formally recognise “objections” or “support” in the same way that many people may be familiar with in relation to planning applications on land.

Under the Marine Infrastructure Management Act 2016, interested parties such as MWT make formal submissions and representations to the Examining Body. That is the route we have used to raise ecological issues, ask questions, provide evidence and seek improvements. In this process, we have focused on working carefully to help secure the best possible outcome for wildlife, habitats and the wider marine environment. All of MWT’s formal representations within this process are listed in an appendix below.

MWT has a clear [Policy Statement on Renewable Energy Developments](#) that recognises the need for renewable energy balanced by ecological considerations. MWT staff have conducted a detailed review of the Applicant’s 10,000-page Environmental Impact Assessment and thousands of more pages of further documentation which have been submitted during the Examination thus far. This work is unfunded, but MWT has undertaken it because Manx wildlife needs an informed and consistent voice in decisions of this scale.

By way of example of the outcomes of MWT’s public engagement and examination responses, the proposed cable landfall at Port Skillion has now been dropped. This option would have adversely impacted two Marine Nature Reserves, an Area of Special Scientific Interest and rare marine species found in Douglas Bay.

However, MWT remains significantly concerned about the following ecological concerns:

1. Several of the baseline ecological assessments are inadequate and do not allow for an appropriate assessment of potential ecological impacts (most notably the benthic and marine mammal assessments).
2. Contrary to the “uniquely Manx” approach originally proposed by the Applicant, ecological impacts have often only been assessed at a very broad scale, including the use of international-scale biogeographical regions. This dilutes the local-level impacts. Explicit conclusions of impact assessments at the Manx national level are therefore required throughout:
 - a) Government policy is that adverse ecological impacts need to be mitigated. This can only be achieved through an Environmental Impact Assessment at the national Manx scale. However, a robust framework of Manx-specific guidance for ecological assessments currently does not

exist, and much of the current legislation broadly appropriates British environmental regulations without taking into account the Manx context. Such a framework would have made this process more straightforward and effective.

- b) The issue of evaluating how something is going to affect wildlife populations specifically in the Isle of Man is important. We believe that the Manx ecological impacts have to date been understated by the Applicant. By way of example, the Applicant's annual expected number of bird deaths is 660 individual birds per year, including the modelled deaths of 466 auks (the seabird group which includes locally [amber-listed](#) Guillemot, red-listed Razorbill and red-listed Puffin). In a Manx context, for Guillemot, the modelled 309 annual deaths represent around 21% of the [known Manx over-wintering population](#). For Razorbill, the modelled 149.5 annual deaths is actually significantly greater than the entire Manx over-wintering population. We therefore do not agree that such mortality can be insignificant in a Manx context.
3. By stating only insignificant impacts across all areas of ecology, the Applicant has avoided the requirement to suggest suitable mitigation. This is still required under several Manx policies, including Environment Policy 4 of the Strategic Plan (which sets planning policy best practice in the absence of specific marine frameworks), the Island's Biodiversity Strategy and the Climate Change Act 2021.

This is the largest development ever proposed for the Isle of Man, and the first major marine consent application of its kind, under a new and untested piece of legislation (MIMA). MWT's role is to help ensure that Manx wildlife, habitats and ecological policy are properly considered. This project, if consented, will set the example for all applications which follow.

MWT will continue to act on behalf of wildlife throughout the Examination and beyond. We are grateful to our Members and supporters for enabling MWT to speak up for Manx nature. If Members have further ecological issues to raise that are not already covered in the submissions listed below, we warmly invite you to make your voice heard to applications.mima@gov.im. At Manx Wildlife Trust, the point of contact is Dr Carmel Croukamp, Head of Engagement, carmel@mwt.im.

Appendix A: MWT formal representations under the Marine Infrastructure Management Act

Unlike the onshore [Town & Country Planning Act 1999](#), the [Marine Infrastructure Management Act 2016](#) does not actually recognise 'objections' *per se*. Instead, interested parties can raise concerns via formal 'submissions' or 'representations' (see Sections 24, 28, 30, 31 & 32 of the Act). All such MWT representations to date are listed below.

Pre-examination Public Consultation (by Environmental Impact Assessment Chapter)

- [Offshore And Intertidal Ornithology Response 1068197483 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Marine Geology, Oceanography And Physical Processes Response 262812411 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Benthic Subtidal And Intertidal Ecology Response 805843807 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Marine Mammals Response 736235969 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Fish & Fisheries Response 635869768 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)

- [Protected Sites Response 276695941 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Onshore Impact Response 369778442 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Cumulative Effects Response 89498148 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Commitments Register Response 500410064 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Evidence Plan Process Response 469515724 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)
- [Orsted Biodiversity Strategy Response 449433632 to Consultation on Mooir Vannin Offshore Wind Farm Limited's application for marine infrastructure consent](#)

Examination Written Responses

Examination Deadline 1

D1-196 [Manx-wildlife-trust-response-to-exb-first-written-questions.pdf](#)

Examination Deadline 2

D2-063 [Manx-wildlife-trust-deadline-2-response.pdf](#)

D2-064 [Manx-wildlife-trust-groudle-glen-observer-form.pdf](#)

D2-065 [manx-wildlife-trust-howsdrake.pdf](#)

D2-071 [mwt-howsdrake-images compressed-1.pdf](#)

Examination Deadline 3

D3-053 <https://mima.gov.im/media/4d1ivcys/manx-wildlife-trust-deadline-3-response.pdf>

Examination Deadline 4

D4-181 [manx-wildlife-trust-1.pdf](#)

D4-182 [manx-wildlife-trust-2.pdf](#)

D4-183 [manx-wildlife-trust-3.pdf](#)

Examination Deadline 5

D5-044 [manx-wildlife-trust-mwt-1.pdf](#)

D5-045 [manx-wildlife-trust-mwt-2.pdf](#)

Hearing Submissions – May

HS2-007 [mwt-1.pdf](#)

HS2-008 [mwt-2.pdf](#)

HS2-009 [mwt-3.pdf](#)

HS2-010 [mwt-4.pdf](#)

HS2-001 [mwt-5.pdf](#)

Hearing Submissions - July

HS3-018 [manx-wildlife-trust-1.pdf](#)

HS3-019 [manx-wildlife-trust-2.pdf](#)

HS3-020 [manx-wildlife-trust-3.pdf](#)

HS3-021 [manx-wildlife-trust-4.pdf](#)

HS3-023 [manx-wildlife-trust-5.pdf](#)

HS3-024 [manx-wildlife-trust-6.pdf](#)

HS3-025 [manx-wildlife-trust-7_compressed.pdf](#)

Regulation 31 Submissions - deadline of 24

MWT response to SIH8 Hearing Actions – we are informed that this will be published by Regulation Deadline 7.

[MWT response to SIH9 Hearing Actions](#)

Examination Verbal Representations

EV-012 [Recording of Specific Issue Hearing 2](#)

EV-016 [Specific-issue-hearing-2-transcript_compressed.pdf](#)

EV-033 [Recording of Specific Issue Hearing 6](#)

EV-038 [specific-issue-hearing-6-transcript_compressed.pdf](#)

EV-053 [Recording of Specific Issue Hearing 9](#)

EV-057 [Specific-issue-hearing-9-transcript_compressed.pdf](#)

Statement of Common Ground with the Applicant (N.B. this is an EARLY DRAFT)

D4-106 [Statement of Common Ground between Mooir Vannin Offshore Wind Farm Limited and Manx Wildlife Trust Deadline 4: 16 June 2026](#)

N.B. The Applicant has been directed by the Examining Body to draft a document to highlight the areas in which the Applicant and MWT have disagreement and objections. This document, a draft of which is shared above, is still at a very early stage and has not yet undergone detailed review by MWT. This draft document will be finalised before the Deadline 8 on Friday, 28th August 2026.