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MMO Reference: DCO/2021/00002
Planning Inspectorate Reference: EN010119
Identification Number: 20051047

25 April 2025

Dear Wendy McKay,

Planning Act 2008, Proposed North Falls Offshore Wind Farm Project Order Deadline 4 Submission

On 22 August 2024, the Marine Management Organisation (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 North Falls Offshore Wind Farm Ltd, (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed North Falls Offshore Wind Farm Project (the DCO Application) (MMO ref: DCO/2021/00002; PINS ref: EN010119).

The DCO Application seeks authorisation for the construction, operation and maintenance of North Falls Offshore Wind Farm (the Project or North Falls): an offshore generation station with a capacity exceeding 100 megawatts (MW) comprising up to 57 wind turbine generators together with associated onshore and offshore infrastructure and all associated development.

Three Deemed Marine Licences (DML) are included in the draft DCO. Schedule 8 includes the deemed marine licence includes the deemed marine licence for generation assets. Schedule 9 Includes the deemed marine licence for transmission assets, and schedule 10 includes the deemed marine licence for the offshore converter station element for the transmission assets, should that infrastructure be required.

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 are drafted in a DML that enable the MMO to fulfil these obligations.

This document comprises the MMO's submission for Deadline 4.



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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,



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1. Comments on Applicant's Comments on Responses to Examining Authority's (ExA) Questions (ExQ1) (REP3-036)

1.1.1 The MMO has reviewed the Applicants comments on Responses to ExQ1 (REP3-036) and has provided comments below:

1.1 Comments on the Applicant's Response to Environment Agency's comments on ExQ1 [REP2-034]

1.1.1 The MMO notes that the Applicant is negotiating protective provisions with Five Estuaries Offshore Wind Farm Limited and the Environment Agency. The MMO hopes that any issues will be resolved, and parties will be able to reach an agreement before the end of examination.

1.1.2 The MMO acknowledges that the Applicant continues to engage with the Environment Agency to provide clarification on the concerns outlined in their response in relation to Flood Risk Assessment.

1.1.3 The MMO notes the updates made by the Applicant to Paragraph 81 of the Outline Code of Construction Practice [7.13 (Rev2)] to include the following text committing to consulting with the Environment Agency during the development of any piling risk assessment, if required. The MMO expects the Applicant to engage with EA to resolve any outstanding issues arising through examination.

1.2 Comments on the Applicant's Response to Historic England's comments on ExQ1 [REP2-038]

1.2.1 The MMO notes that the applicant has committed to the requested programme of further survey and analysis which is established through the updated Outline Offshore Written Scheme of Investigation (WSI) submitted at Deadline 1 [REP1-031].

1.2.2 The MMO has no comments on the standard conditions being included in the DML:

1.2.3 DCO Schedule 8 condition 21 (2) and DCO Schedule 9 condition 22 (2) require a 'marine written scheme of archaeological investigation', in accordance with the outline offshore WSI, to be submitted to and agreed with the MMO.

1.2.4 DCO Schedule 8 condition 21(3) and DCO Schedule 9 condition 22(3) require that that pre-construction archaeological investigations and pre-commencement material operations which involve intrusive seabed works must only take place in accordance with a method statement produced under the written scheme of investigation specific to the relevant pre-construction activities (which must accord with the details set out in the outline offshore written scheme of investigation).

1.3 Comments on the Applicant's Response to The Crown Estate comments on ExQ1 [REP2-061]

1.3.1 The MMO notes the Applicants response in relation to Marine Net Gain (MNG), that as noted by the Crown Estate and also Natural England in response to this question, there is currently no policy or requirement for project such as North Falls to provide MGN. The MMO notes that the Applicant does not consider delivery of MNG to be feasible given that there is currently no available guidance. The MMO agrees with this approach.

1.4 Comments on the Applicant's Response to The Royal Society for the Protection of Birds comments on ExQ1 [REP2-062]

- 1.4.1 The MMO notes the differing position of the Applicant and RSPB and that the Applicant's position is that North Falls would not hinder the conservation objectives of Outer Thames Estuary SPA as described in the RIAA Part 4[APP-178], Section 4.4.1.3. The MMO also notes that the Applicant has followed guidance from NE. The MMO defers to the relevant Statutory Nature Conservation Body (SNCB) for their advice on ornithology matters.

1.5 Comments on the Applicant's Response to Natural England's comments on ExQ1 [REP2-054]

- 1.5.1 The MMO acknowledges that Natural England is not satisfied that an adverse effect on the integrity (AEol) (alone or in combination) of the Stour and Orwell SPA and the Ramsar Site can be excluded beyond reasonable scientific doubt. The MMO notes that the Applicant maintains their position presented in the RIAA that there would be no AEol of the Stour and Orwell SPA and Ramsar. The MMO would highlight that NE are the SNCB and defers to NE on the Habitat Regulation Assessment. The MMO notes that in previous offshore windfarm examinations even though there was a fundamental disagreement between the parties, the Applicant still provided further assessments or a without prejudice position on the derogation process for the Marine Protected Areas where agreement could not be achieved to ensure the Examining Authority and Secretary of State had enough information for determination. The MMO would expect this to be provided at the earliest opportunity during the examination to ensure all interested parties could review the documents provided.
- 1.5.2 The MMO welcomes the commitment by the Applicant to achieve a minimum of 10% Biodiversity Net Gain to provide enhancements and habitat creation proportionate to the baseline habitats being permanently lost at the onshore substation.
- 1.5.3 The MMO notes the Applicant's agreement with Natural England that there is currently no requirement on developers to deliver marine net gain and it is not possible to provide a MNG plan as policy on MNG has not been set out by the Government.
- 1.5.4 The MMO welcomes the applicant's cooperation with National Trust and an experienced fencing contractor to consider the design of the fence to enable further assessment of the environmental impacts of the compensation measure to inform a post consent Planning Application. The MMO defers to the relevant SNCB on AEol of any National Site.

2. Comments on concerns raised by Port of London Authority [REP3-067] and London Gateway Port Limited [REP2-041]

- 2.1.1 The MMO is keeping a watching brief on agreements between the Applicant and Port of London Authority and London Gateway Port Limited.
- 2.1.2 The MMO is in discussions with Port of London Authority regarding any issues that may need to be updated in the DML and will provide an update in due course.
- 2.1.3 The MMO believes that these issues can be decided upon at the consenting stage and therefore should not be within a document for further discussions on the major issues post consent and will provide further comments throughout examination.

3. Response to the Applicant's Comments on MMO Deadline 2 Submission

3.1 Response to the Applicant's Comments on MMO Deadline 2 Submission REP2-043

3.1.1 Due to the responses provided at Deadline 3 and as part of the Additional Submission the MMO has reviewed this document and only commented where new information can be provided. The MMO will provide a response to these issues at Deadline 5 in response to the Applicant comments on our Deadline 3 documents.

Article 5 Transfer of benefit

3.1.2 The MMO notes the most recent Rampion 2 Offshore Wind Consent Decision where the ExA and SoS discussed this topic. Although the Article remained in this DCO the MMO has provided further arguments in Table 1 of REP3-056 which have not been commented on.

3.1.3 In addition to the previous comments, as a matter of public law, the MMO does not think the Order can contain a provision transfer of Benefit of the DML as is being proposed. PA 2008 Section 120(3) should read against Section 120(4) and Part 1 of Schedule 5, which the MMO thinks limits what the Order can contain to provisions which deem a marine licence to be granted under the order and to the conditions that should be deemed attached to that licence. The MMO does not consider this to be sufficiently wide as to allow the inclusion of provisions which transfer the Benefit of the Order.

3.1.4 If the Order cannot contain a DML transfer provision for the reasons set out, then it cannot exclude Section 72 of Marine and Coastal Access Act 2009 (MCAA 2009) in the way proposed as Section 120(5) is limited to applying/modifying/excluding only those statutory provisions which relate to any matter for which a provision may be made in the order.

3.1.5 The reason that the DCOs only deem the Marine Licence to be granted, rather than bringing the DML into the DCO as it does for other permissions under s33 of the PA 2008 is because the MMO was considered to be the expert in this area (see PINS note Annex 11 - MMO). The MMO questions why now is the SoS best placed to consider the implications of the marine licence being transferred and what might need to change?

3.1.6 Therefore, the provision in paragraph (3) should not extend to the DML. The Order and the DML are not the same thing and so this provision does not extend to the DML, and references to the undertaker in the DML will stay as is.

3.1.7 Whilst the mechanism is different, what falls out of the DCO process is a marine licence granted under MCAA which is distinct and separate to the DCO itself. The DML falls back to the MMO to further manage/regulate under the provisions of MCAA once the DCO is granted, to be regulated alongside and consistently with all the other marine licences we might issue. This is in part why s149A(4) says a person who fails to comply with a condition of the DML does not commit an offence under the s161 of the PA 2008 and why 149A(5) disapplies the notification of application and representations provisions of MCAA from the DCO process.

3.1.8 The MMO notes the Applicant's concern in relation to the undertaker being required by statute to transfer the transmission assets to an OFTO and cannot retain those in the same ownership as the generation assets and that this is done at the earlier stages and any delay in this process. However, even for granted offshore windfarm orders that include a form of the Benefit of the Order Article, the MMO has done multiple variations alongside the transfer of benefit to ensure the DML variation is issued as close to the approval from the SoS to ensure the correct undertaker is on the face of the DML and so that updates to the Marine Case Management System can be completed and any updates to the cost recovery requirements can be made with the correct undertaker.

Schedule 8, 9 and 10 (Deemed Marine Licences) Part 1: Paragraph 9

3.1.9 The MMO has further reviewed the wording of this condition and on this occasion is content with the wording 'materially greater' and considers this matter closed.

4. Underwater Noise

4.1 Comments on Applicant's Response to MMO comment regarding Underwater noise policy papers [REP3-039]

4.1.1 In table 2.2 the Applicant states:

The Applicant has taken into consideration the published policy papers for North Falls. With regards to the Reducing Noise policy and NE/JNCC/Cefas joint position on Noise Abatement, the Applicant notes that potential mitigation options, including Noise Abatement Systems (NAS), are proposed within the Outline Site Integrity Plan (SIP) [APP-243] which would be finalised post-consent in line with the final design of the Project. As secured by condition to the proposed deemed marine licences in the draft DCO, in the event that piling is required. It is recognised that upon assessment of more developed design information, any need for the implementation of NAS will be decided in consultation with the licencing authority. The Applicant is planning appropriately for the potential requirement for NAS but maintains the position that the effects may be suitably mitigated through further design refinement and embedded mitigation. In regard to the Unexploded Ordnance (UXO) position statement, the Applicant has considered these changes and ensured the Draft Marine Mammal Mitigation Protocol (MMMP) incorporates the latest guidance for UXO clearance. An updated version of the Draft MMMP [7.7, Rev 1] is provided at Deadline 3.

4.1.2 The MMO acknowledges the Applicant's review on the published policy papers and welcome proposed mitigation options, including Noise Abatement Systems (NAS) within the Outline Site Integrity Plan (SIP) [APP-243]. However, the MMO would also expect the SIP and MMMP to be updated to commit to the use of noise reduction measures based on the policy papers and include reference to these papers within the document. The MMO would highlight that it is unlikely that a wildlife licence will be issued without noise reduction measures going forward, but we note that they may not be required depending on the design plan.

4.1.3 In addition to this the MMO understands NE is requesting further commitment within the DML. The MMO notes that a condition has been included on a without prejudice basis in multiple recent Examinations (Morgan and Morecambe Generation Offshore Wind Farms). The MMO would welcome being part of the discussions for North Falls.

4.1.4 The MMO welcomes the consideration by the Applicant of the updates to the Unexploded Ordnance (UXO) position statement and the updates to the Draft Marine Mammal Mitigation Protocol (MMMP) to incorporate the latest guidance for UXO clearance. Further comments on the updated version of the draft MMMP [7.7 Rev 1] is provided below:

4.2 Comments on the updated Draft Marine Mammal Mitigation Protocol (MMMP) [REP3-014 – Tracked]

4.2.1 The MMO notes Paragraph 99 highlights that the details will be discussed with suppliers post consent once the final design is made. The MMO recommends the discussions with suppliers begins now and the commitment to securing noise reduction is reflected within the MMMP. For example, Morgan Generation Offshore Wind Farm added to their underwater sound management strategy (UWSMS) (noting a slightly different approach):

'If it is deemed necessary to apply NAS for piled foundations either as a result of forthcoming policy on underwater sound, or it is identified (during discussions with the MMO on the final UWSMS plan following the final scheme design freeze post consent) as the most appropriate mitigation to manage underwater sound from piling, then the Morgan Generation Assets will be in a position (from a programme execution perspective) to implement such measures.'

- 4.2.2 As multiple projects will be constructing at the same time and procurement and finance is not enough to ensure that best endeavours have been shown when applying for a wildlife licence, this commitment would be welcomed now.

Comments on the response by the Applicant to MMMP consultation comments raised by NE

- 4.2.3 The MMO has reviewed the updated Draft Marine Mammal Mitigation Protocol [REP3-014] and notes the Applicant's response to NE comments in Appendix A table 1.5.
- 4.2.4 The MMO welcomes the amendments to text in sections 1.3.2.1.2 stating both acoustic and visual monitoring will be undertaken during daylight hours as requested by NE.
- 4.2.5 The MMO welcomes the justification by the Applicant as to why two hours break has been chosen as a timeframe for a full restart of the procedures. The MMO defers to NE for further comments.
- 4.2.6 The MMO welcomes that Plate 1.2 has been amended to indicate monitoring by Marine Mammal Observers (MMObs) and/or Passive Acoustic Monitoring (PAM) operators must be continued throughout breaks in piling.
- 4.2.7 The MMO welcomes the update to text in section 1.4.2 upon the request of NE to state that two MMObs must be continued throughout breaks in piling.

Comments on the response by the Applicant to MMMP consultation comments raised by MMO

- 4.2.8 The MMO notes the comment by the Applicant that the mitigation proposed for piling will be carried out prior to each pile, and therefore mitigation should be based on the effect from each individual pile, rather than the total piles installed within 24 hours. The MMO notes this and has no further comments at this time.
- 4.2.9 The MMO welcomes the amendments to the pin-pile ramp up procedures and the reduction in ranges.
- 4.2.10 The MMO welcomes the text referring to the "two licence" approach has been added into Section 1.1.
- 4.2.11 The MMO notes the proposed UXO campaign commitments have been added to section 1.4.2. The MMO welcomes that the techniques and options are presented as current examples, and the mitigation options will be reviewed and updated based on the latest information and guidance in the final MMMP alongside the marine licence application.

Comments on the responses by the Applicant to the Examination comments and Relevant Representations in relation to MMMP (Table 1.6)

- 4.2.12 The MMO welcomes that the addition of section 1.3.2.8 for potential additional mitigation.
- 4.2.13 The MMO notes the amendments to Section 1.3 of the Draft MMMP so that the sequential piling impact results are presented and mitigation measures are based on these.

- 4.2.14 The MMO welcomes the clarification in Section 1.3.2.4 that continuous monitoring will be ensured throughout piling, including any break in piling, to ensure the monitoring area is free from marine mammals before piling recommences.
- 4.2.15 The MMO notes that the Applicant considers the requirement for another full soft start period to be disproportionate, instead of the 5-6 hammer blows at low energy (<400kJ) which the Applicant considers will allow any marine mammals that may have moved nearby during the break time to move away again without providing any excessive noise. The MMO maintains their position that the guidance is adhered to and the full soft start is implemented and this should be reflected within the MMMP. The MMO is open to further discussion on this requirement post consent once the final design is confirmed however at this time the guidance should be adhered to.
- 4.2.16 The MMO welcomes the clarification in Paragraph 108 to ensure that if high-order clearance is required then NAS must be used.
- 4.2.17 The MMO recommended in their comment MMO-195 that the level vs range plots (for comparable hammer strike energies), with the associated envelopes of variability are provided. The MMO welcomes that these plots have been provided in Appendix B as part of the revised Draft MMMP and is currently reviewing these with our scientific advisors and will confirm this matter is closed at Deadline 5.

5. Response to the 2021 sediment survey laboratory analysis

5.1 2021 Sediment survey laboratory analysis review

5.1.1 The MMO requested in their Section 56 Relevant Representation [RR-216 5.3.3] that the Applicant provide the data from the 2021 sediment survey laboratory analysis in the MMO template. The Applicant provided this via email on 18 February 2025.

5.1.2 In providing this response the MMO has reviewed the following documents:

- NF_GrabSampleLocations_MMO_SSE_20241206.shp.xml
- NF-M-DES-0033-0002-GrabSampleLocations-R00.pdf
- North Falls Survey Data.xlsm
- North Falls Survey Data_continuation.xlsm

5.2 Comments on 2021 Sediment survey laboratory analysis review

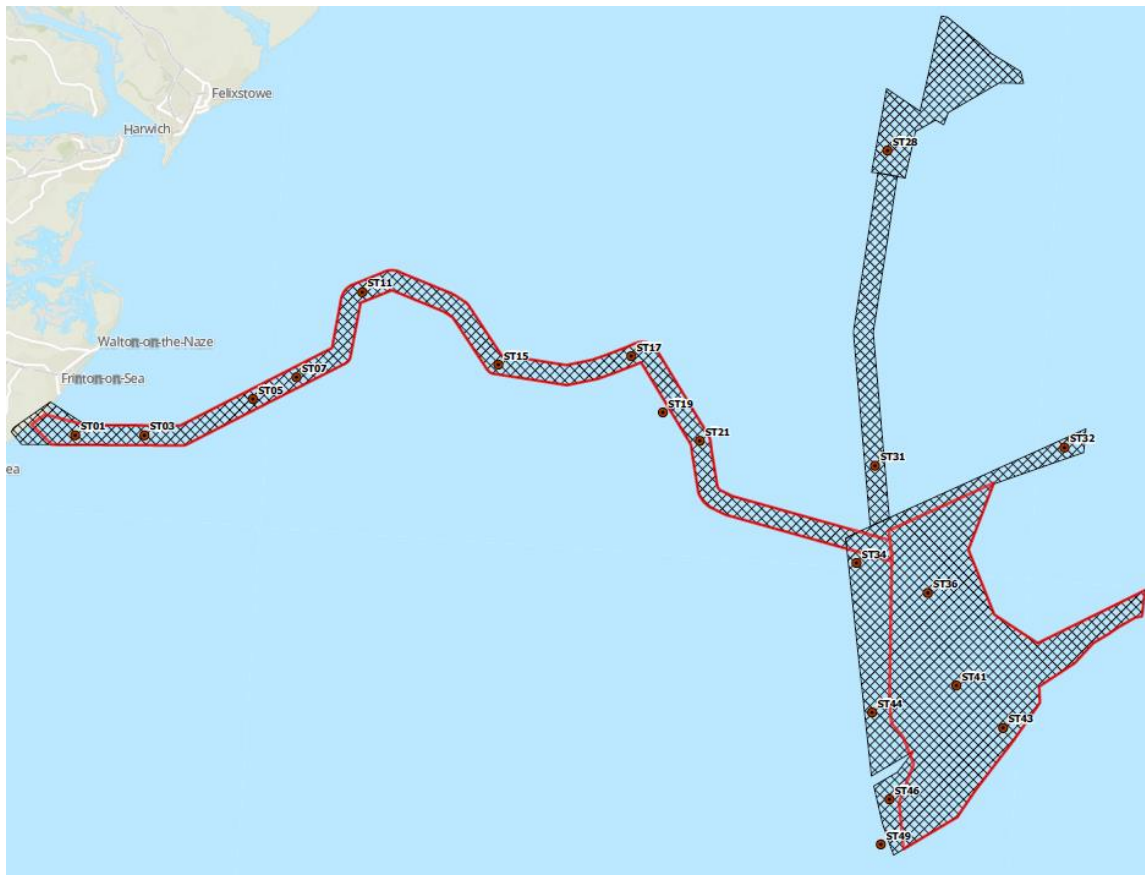


Figure 1: Screenshot of the sediment sample locations (obtained from NF-M-DES-0033-0002-GrabSampleLocations-R00.pdf) **Key:** | = Current array area and Export Cable Corridor (ECC). Hatched = Original array area and ECC. Points = Sediment sample sites.

- 5.2.1 The MMO notes that in total 39 surface samples were taken from across the Projects Array and Export Cable Corridor (ECC) areas; 19 samples (those visualised in Figure 1) were taken for particle size analysis (PSA), trace metals (including arsenic), Polycyclic aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs) whilst the remaining 20 samples (not visualised in Figure 1) were only analysed for PSA, with the Applicant stating that these are exempt from chemical analysis. The sediment coordinates supplied in the shape file for the 19 samples analysed for contaminants are in-line with those pictured in Figure 1. The MMO is content that the 19 samples analysed for contaminants provide adequate spatial coverage across the dredge area.
- 5.2.2 The MMO has not been able to locate a sample plan for this sediment sampling and therefore cannot determine if this is in-line with the sample plan requested, if one exists, and if the 20 samples exempt from chemical analysis had been agreed prior to this advice. No justification has been provided for the exempted samples and the Applicant should clarify their reasonings for this and should also note that these should be provided in the future alongside sediment samples.
- 5.2.3 All analyses were undertaken by MMO validated laboratories. Particle size analysis (PSA) was conducted by Fugro (the MMO have assumed this is Fugro GB Marine Limited), whilst the analyses of trace metals (including arsenic), PAHs and PCBs were undertaken by SOCOTEC UK Ltd. The sediment sampling and analysis were all conducted in 2021 (four years ago) which is outside of the three years recommended by OSPAR guidelines, however given the low levels of sediment sampling results (see below), the MMO is content the sampling is within the five year validity window under OSPAR and therefore resampling is not necessary at this time. The Applicant should note that the sediment sampling and analysis results should be provided more promptly in the future.
- 5.2.4 The PSA indicates that the sediment composition for the majority of samples in Figure 1 (those analysed for contaminants) are predominantly composed of sand (39% - 99%) followed by gravel (0.1% - 31%) and silt / clay (0% - 41%). Five samples (ST01, ST07, ST17, ST28 and ST36) are predominantly composed of gravel (48% - 64%) followed by sand (29% - 42%) and then silt / clay (5% - 19%). One sample (ST03) is predominantly composed of silt / clay (55%) followed by sand (30%) and then gravel (13%). The average sediment composition for the 20 samples not analysed for contaminants indicates they are predominantly composed of sand (64%) followed by gravel (22%) and then silt / clay (13%). The average grain size of the sand in these samples indicates that the majority of samples are 'very coarse' sand (40%) followed by 'medium' sand (15%) and then 'fine' sand (8%). Out of these 20 samples only one (ST02) has a majority silt / clay composition (74%); if the numbering of samples are in order and away from shore, this would indicate that the two samples with majority silt / clay composition (ST02 and ST03) are closer inshore.

The majority of samples are composed of sand (very coarse) and would indicate that the risk from contaminants are lower due to their larger size; this is in keeping with sampling for other offshore wind farms where coarser material is typically found further away from shore.

5.2.5 Analysis of trace metals indicates eight samples (out of 19) with levels of arsenic greater than Cefas Action Level 1 (AL1) but less than Cefas Action Level 2 (AL2); one sample (ST28) is closer to AL2 than AL1 but is not close to the threshold. Three samples contain levels of nickel greater than AL1 but less than AL2; all samples are close to the AL1 threshold. All remaining trace metals are below their respective AL1 in all samples, with both cadmium and mercury below the limit of detection (LOD) in seven samples each. The material in respect to trace metals is considered acceptable for disposal at sea.

5.2.6 The MMO uses the best available evidence for assessment and therefore refers to the recommendations in Mason et al. (2022), which in this case in the absence of a defined AL2 for PAHs the Gorham-Test approach is utilised (Gorham et al., 1999; Long et Al., 1995; 1998). It should be noted that these recommended guidelines are not formally agreed ALs and their use is advisory. This is an effects-range approach which considers the sum total of a number of the low molecular weight (LMW) PAH analytes which are seen as acutely toxic, and a selection of the high molecular weight (HMW) PAH's that are considered to be more long-term acting (i.e. carcinogenic) which are compared for each sample for two effects ranges. Total values of the LMW PAHs and the total of the HMW PAHs are calculated and then compared to threshold values. If a total value (for either LMW or HMW selection of PAHs) does not exceed the effects-range low (ERL), the indication is that the sediment in the sample can be considered low risk. If a total value exceeds the effects-range median (ERM) for either the LMW or the HMW total values, it can be considered higher risk, with more likelihood of harm occurring. The LMW and HMW levels are displayed in Figures 2 and 3 and indicate that all samples contain levels of both LMW and HMW PAHs below the ERL and in some cases below the LOD. The material in respect to PAHs is considered acceptable for disposal at sea.

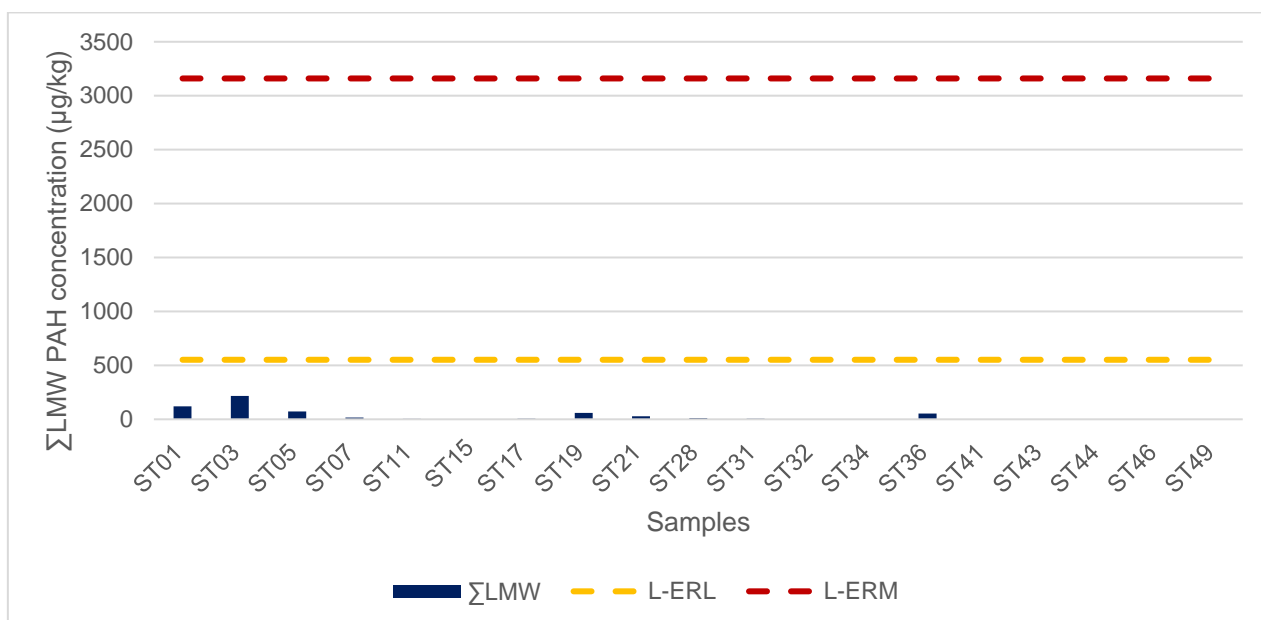


Figure 2: LMW PAH levels in sediment samples from the project (obtained from North Falls Survey Data.xls)

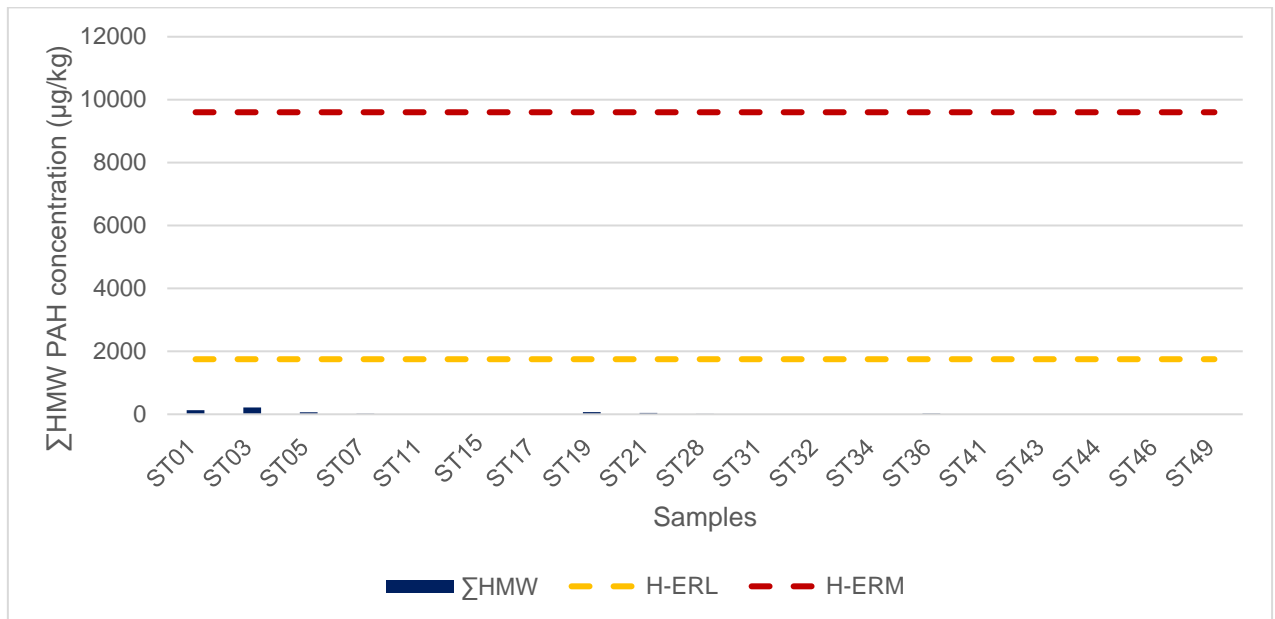


Figure 3: HMW PAH levels in sediment samples from the Project (obtained from North Falls Survey Data.xls)

5.2.7 PCB analysis revealed that all samples contained levels of ICES 7 and Total 25 PCB congeners below AL1. Furthermore, only two samples (ST01 and ST44) contained levels of any PCB congener above the LOD whilst all remaining samples (17) contained levels of all PCB congeners below LOD. ST01 contained CB153 above the LOD whilst ST44 contained levels of CB141 and CB153 above LOD. The material in respect to PCBs is considered acceptable for disposal at sea.

5.2.8 In summary, the 19 sediment samples in Figure 1 are considered acceptable for disposal at sea given the low levels of trace metals, PAHs and PCBs within the material.

5.3 Disposal Sites

5.3.1 The MMO notes that six of the 19 sample locations in Figure 1 are within the Five Estuaries ECC (TH019) disposal site which is currently open. As such, the ECC and Array area for NFOWF and their respective disposal sites will overlap with Five Estuaries ECC (TH019) disposal site. Two disposal sites cannot overlap and due to the stage of Five Estuaries we cannot close the disposal site. Therefore, we require the following to ensure the disposal site can be designated:

- 1) A new shapefile for the cable corridor of Five Estuaries and North Falls together to allow us to update TH019 to be the whole area – noting the DCO only allows deposits within the order limits for both projects. This will mean no changes are required to the Five Estuaries DML and although the name will still remain as Five Estuaries, North Falls can utilise the site.
- 2) The Map in Figure 3 below is from <https://map.4coffshore.com/offshorewind/> and the MMO note the ECC for Five Estuaries may be different. The gap in the middle between both cables will need to be included in the disposal site as it needs to be one continuous area.
- 3) An updated site characterisation report to explain this and please include a map of the whole site and provide information on the volume to be disposed within this site.



Figure 3: Map to show the Export Cable Corridor and boundaries of North Falls Offshore Windfarm and Five Estuaries Offshore Wind Farm.

5.3.2 The MMO believes that this is the best solution however there is an alternative:

- A new shape file for each of the areas of cable corridor outside the Five Estuaries ECC.
- An updated site characterisation report to set out what will be disposed within the overlapping area of TH019 and what will be disposed of within each area identified in a shape file. This should also include a map of the whole site with each area identified.

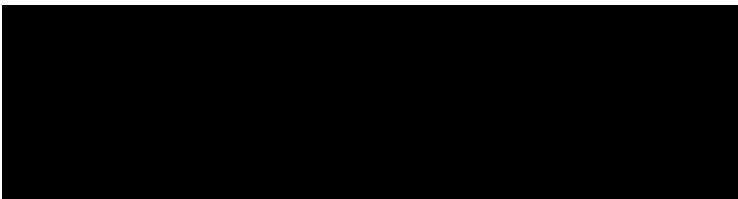
5.3.3 The MMO are in discussion with the applicant on updates to the disposal site shapefiles.

6. Progress with Statement of Common Ground (SoCG)

6.1 Progress with Statement of Common Ground

- 6.1.1 The MMO provided comments on the draft SoCG on 11 February 2025. Updated version was issued to the MMO on 28 February 2024. The MMO had a meeting with the Applicant on 14 April 2025 to discuss the updates to the SoCG and outstanding issues. The MMO has reviewed the SoCG and have submitted updates to the Applicant. The SoCG is expected to be submitted at Deadline 4.
- 6.1.2 There are a number of outstanding issues and meetings are being arranged for after Deadline 4 to discuss these matters further.

Yours Sincerely,



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7. References

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