

Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Draft Statement of Common Ground with the Marine Management Organisation

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Contents

1	Introduction	8
1.1	Overview of the Project	8
1.2	Purpose of this document.....	8
1.3	Consultation with the MMO	11
1.3.1	Pre-application	11
1.3.2	Post-application.....	11
1.3.3	Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters.....	12
2	Statements of Common Ground.....	13
2.1	Draft Development Consent Order	13
2.2	Project-wide considerations.....	20
2.3	Marine ecology	22
2.4	Marine mammals.....	40
2.5	Draft, Outline and In-Principle DCO documents	48
3	Signatures	51
4	References	52

Tables

Table 1.1 Topics included in the draft SoCG	10
Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters.....	12
Table 2.1 Summary of agreements per topic	13
Table 2.2 Summary of consultation with the MMO regarding the draft DCO and DML	14
Table 2.3 Topics agreed, in discussion or not agreed with the MMO in relation to draft DCO and DML.....	15
Table 2.4 Summary of consultation with the MMO regarding Project-wide considerations	20
Table 2.5 Topics agreed, in discussion or not agreed with the MMO in relation to Project-wide considerations	21
Table 2.6 Summary of consultation with the MMO regarding Marine Ecology ETG topics.....	22
Table 2.7 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Geology, Oceanography and Physical Processes.....	26
Table 2.8 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Sediment and Water Quality.....	29
Table 2.9 Topics agreed, in discussion or not agreed with the MMO in relation to Benthic Ecology	31
Table 2.10 Topics agreed, in discussion or not agreed with the MMO in relation to Fish and Shellfish Ecology	34
Table 2.11 Summary of consultation with the MMO regarding marine mammals	40
Table 2.12 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Mammals.....	43
Table 2.13 Summary of consultation with the MMO regarding draft, outline and in-principle DCO documents	48
Table 2.14 Topics agreed, in discussion or not agreed with the MMO in relation to draft, outline and in-principle DCO documents.....	50

Glossary of Acronyms

ADD	Acoustic Deterrent Device
CEA	Cumulative Effect Assessment
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
EPP	Evidence Plan Process
ES	Environmental Statement
ETG	Expert Topic Group
HRA	Habitats Regulations Assessment
IPMP	In-Principle Monitoring Plan
MCZA	Marine Conservation Zone Assessment
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
OOOMP	Outline Offshore Operations and Maintenance Plan
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
PAH	Polycyclic Aromatic Hydrocarbons
PCB	Polychlorinated Biphenyls
PEIR	Preliminary Environmental Information Report
PEMP	Project Environmental Management Plan
PSA	Particle Size Analysis
RIAA	Report to Inform Appropriate Assessment
SoCG	Statement of Common Ground
SSC	Suspended Solid Concentration
THC	Total Hydrocarbon Concentrations
UK	United Kingdom
WTG	Wind turbine generator

Glossary of Terminology

Applicant	Morecambe Offshore Windfarm Ltd
Agreement for Lease (AfL)	Agreements under which seabed rights are awarded following the completion of The Crown Estate tender process.
Evidence Plan Process (EPP)	A voluntary consultation process with specialist stakeholders to agree the approach, and information to support, the Environmental Impact Assessment (EIA) and Habitats Regulations Assessment (HRA) for certain topics. The EPP provides a mechanism to agree the information required to be submitted to the Planning Inspectorate as part of the Development Consent Order application. This function of the EPP helps Applicants to provide sufficient information in their application, so that the Examining Authority can recommend to the Secretary of State whether or not to accept the application for examination and whether an appropriate assessment is required.
Expert Topic Group (ETG)	A forum for targeted engagement with regulators and interested stakeholders through the EPP.
Generation Assets (the Project)	Generation assets associated with the Morecambe Offshore Windfarm. This is infrastructure in connection with electricity production, namely the fixed foundation wind turbine generators (WTGs), inter-array cables, offshore substation platform(s) (OSP(s)) and possible platform link cables to connect OSP(s).
Inter-array cables	Cables which link the WTGs to each other and the OSP(s).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400kV cables and associated grid connection infrastructure such as circuit breaker infrastructure. Also referred to in this chapter as the Transmission Assets, for ease of reading.
Offshore substation platform(s)	A fixed structure located within the windfarm site, containing electrical equipment to aggregate the power from the WTGs and convert it into a more suitable form for export to shore.
Platform link cable	An electrical cable which links one or more OSP(s).
Windfarm site	The area within which the WTGs, inter-array cables, OSP(s) and platform link cables will be present.



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1 Introduction

1.1 Overview of the Project

1. The Morecambe Offshore Windfarm is a proposed offshore windfarm located in the Eastern Irish Sea, which when fully operational, would have an anticipated nominal capacity of 480 megawatts (MW) and would have the potential to generate renewable power for over 500,000 homes in the United Kingdom (UK).
2. The Project was one of six projects selected by The Crown Estate in its Offshore Wind Leasing Round 4 in 2021. The Agreement for Lease (AfL) for the Project was received in 2023.
3. The AfL comprises an area of up to 125km² and reflects the windfarm site assessed in the Project Preliminary Environmental Information Report (PEIR). Following design development, surveys, assessments and consultation on the PEIR, the proposed windfarm site development area has been reduced to approximately 87km².
4. The Project relates to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSP(s)), and possible platform link cables to connect OSP(s)).
5. A separate consent for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) is being sought.

1.2 Purpose of this document

6. This draft Statement of Common Ground (SoCG) has been prepared by Morecambe Offshore Windfarm Ltd (the Applicant) with input from the Marine Management Organisation (MMO). This identifies topic areas where there is agreement, areas of disagreement, and areas which remain under discussion in relation to the Development Consent Order (DCO) application for the Morecambe Offshore Windfarm Generation Assets (hereafter 'the Project').
7. Consultation with technical stakeholders, including the MMO, has been facilitated through the Evidence Plan Process (EPP). As part of the EPP, Expert Topic Groups (ETGs) were established, with a number of regular ETG meetings held throughout the pre-application process to agree the technical information required as part of the DCO application. Consultation is described in each technical Chapter for the Environmental Statement (ES) (Chapters 7 – 22) (APP-044 – APP-059) and Chapter 6 EIA Methodology (APP-043) of the ES. Further, regular update meetings have been undertaken with the MMO

through the pre-application process. Full details of pre-application consultation for the Project are provided in the Consultation Report (APP-015).

8. The Applicant has had regard to the Planning Act 2008: Guidance for the examination of applications for development consent (Department for Communities and Local Government, 2015) when compiling this draft SoCG.
9. The matters considered within this draft SoCG are within the MMO's statutory remit, which includes advising offshore wind farm developers on the aspects of a project that may have an impact on the marine area or those who use it. In relation to the Deemed Marine Licence (DML), 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 a keen interest in ensuring that provisions drafted in a DML enable the MMO to fulfil these obligations.
10. Matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and MMO to reach agreement on each matter wherever possible or refine the extent of disagreement between parties.
11. This draft SoCG has been structured to reflect topics and documents (**Table 1.1**) of the Application which are of key interest to the MMO. These topics are covered within DCO documentation including, but not limited to, the Environmental Statement (ES), Report to Inform Appropriate Assessment (RIAA) (APP-027) and the Marine Conservation Zone Assessment (MCZA) (APP-032), as well as other associated DCO documents.
12. The Project relates only to the Generation Assets of the Morecambe Offshore Windfarm (including wind turbine generators (WTGs), inter-array cables, offshore substation platforms (OSPs), and possible platform link cables to connect offshore substations). A separate consent for the Transmission Assets associated with the Morecambe Offshore Windfarm and the Morgan Offshore Wind Project (another proposed windfarm to be located in the Irish Sea) will be sought. Given the interconnected nature of the Project and the Transmission Assets, agreement has also been sought on some Project-wide considerations (**Section 2.2**).

Table 1.1 Topics included in the draft SoCG¹

Topic/chapter	Informed by the EPP (Yes/No)	Document references
Marine Geology, Oceanography and Physical Processes*	Yes	APP-044
Marine Sediment and Water Quality*	Yes	APP-045
Benthic Ecology*	Yes	APP-046
Fish and Shellfish Ecology*	Yes	APP-047, APP-065
Marine Mammals	Yes	APP-048, APP-065, APP-066, APP-067, APP-068, APP-069
Draft DCO and DML	Yes	APP-012
Draft Marine Mammal Mitigation Protocol (MMMP)	Yes	APP-149
In-Principle Monitoring Plan (IPMP)	Yes	APP-148
Outline Project Environmental Management Plan (PEMP)	Yes	APP-146
Outline Offshore Operations and Maintenance Plan (OOOMP)	Yes	APP-150
Sediment Disposal Site Characterisation Report	Yes	APP-024
RIAA	Yes	APP-027, APP-028
MCZA	Yes	APP-031, APP-032, AS-004

13. It is agreed that, whilst the MMO retains an interest in the following areas with respect to the provisions set out in the DCO and DML, the MMO defers to other parties for these topics and has made minimal or no comment in relation to the technical assessments associated with them. Therefore, these topics have not been included in this SoCG:

- Offshore ornithology
- Commercial fisheries
- Shipping and navigation
- Marine archaeology and cultural heritage

¹ Asterisk denotes topics covered in the Marine Ecology ETG.

- Civil and military aviation and radar
 - Seascape, landscape and visual impact assessment
 - Infrastructure and other marine users
14. Further detail of these topics can be found in the ES and Consultation Report.
15. Throughout the draft SoCG the phrase “Agreed” identifies any point of agreement between the Applicant and the MMO. The phrase “Not Agreed” identifies any point that is not agreed between the Applicant and the MMO.
16. Topic specific matters agreed and not agreed, as well as those that remain under discussion between the Applicant and the MMO, are included within this draft SoCG. As stated, matters that are not yet agreed will be the subject of ongoing discussion between the Applicant and the MMO to reach agreement wherever possible, or to refine the extent of disagreement between parties.

1.3 Consultation with the MMO

1.3.1 Pre-application

17. The Applicant has engaged with the MMO on the Project during the pre-application process, both in terms of informal non-statutory consultation and statutory consultation carried out, pursuant to Section 42 of the Planning Act 2008.
18. The MMO provided comments on the EIA Scoping Report (MMO DCO/2022/00001; 20230721) through the formal Scoping Opinion published by PINS on 2nd August 2022 (PINS, 2022) (APP-143).
19. During the statutory consultation held between 20th April and 4th June 2023, pursuant to Section 42 of the Planning Act 2008, the MMO provided comments on the Preliminary Environmental Information Report (PEIR), draft MCZA and draft RIAA by way of a letter dated 30th May 2023 (MMO DCO/2022/00001; 20230530).
20. Further to this, numerous meetings were held with the MMO through the EPP and also through regular update meetings. These are detailed throughout the SoCG, and minutes of the ETG meetings are provided as Appendices to the Consultation Report (APP-016). Additionally, a series of Technical Notes were issued as part of the EPP, which are detailed in **Section 1**.

1.3.2 Post-application

21. Following the submission of the Application, regular meetings have continued with the MMO and are detailed within each topic area in this draft SoCG.

22. The MMO have provided a Relevant Representation (RR-047) in August 2024, a Written Representation in November 2024 and a Deadline 2 submission in December 2024. These have been used to populate this draft SoCG.

1.3.3 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

23. In order to easily identify whether a matter is ‘agreed’, ‘not agreed’ or ‘in discussion’, the colour coding system set out in **Table 1.2** has been used.
24. Details on specific matters that are ‘agreed’, ‘not agreed’ or ‘in discussion’ between the Applicant and the MMO are presented in **Table 2.3**, **Table 2.5**, **Table 2.7**, **Table 2.8**,
25. **Table 2.9**, **Table 2.10**, **Table 2.12** and **Table 2.14** as relevant to the different topics covered.

Table 1.2 Summary of ‘Agreed’, ‘Not Agreed’ and ‘In Discussion’ matters

Position status	Position colour coding
Agreed The matter is considered to be agreed between the parties.	Agreed
Not Agreed – no material impact The matter is not agreed between the parties; however, the outcome of the approach taken by either the Applicant or the MMO is not considered to result in a material impact to the assessment conclusions and the matter is considered to be closed for the purposes of this SoCG.	Not Agreed – no material impact
Not Agreed – material impact The matter is not agreed between the parties and the outcome of the approach taken by either the Applicant or the MMO is considered to result in a materially different impact to the assessment conclusions. Discussions on these matters have concluded.	Not Agreed – material impact
In Discussion The matter is neither ‘agreed’ nor ‘not agreed’ and is a matter where further discussion is required between the parties.	In Discussion

2 Statements of Common Ground

26. A summary of the consultation undertaken to date with the MMO and the matters agreed, in discussion, or not agreed (based on discussions and information exchanged between the Applicant and the MMO) is presented in **Table 2.1**. The topics are set out in detail below for each of the draft SoCG topic areas (**Section 2.1** to **Section 2.5**).

Table 2.1 Summary of agreements per topic

Topic	Status
Draft Development Consent Order	Some points on the conditions of the Deemed Marine Licence in discussion
Project-wide considerations	Agreed
Chapter 7 Marine Geology, Oceanography and Physical Processes	Not agreed (no material impact)
Chapter 8 Marine Sediment and Water Quality	Agreed – noting the disposal site is still to be designated
Chapter 9 Benthic Ecology	Agreed
Chapter 10 Fish and Shellfish Ecology	Some points on cod spawning mitigations in discussion
Chapter 11 Marine Mammals	Some points on the mitigation in discussion
MCZA	Agreed.
Draft, Outline and In-Principle DCO documents	Some points on MMMP and the Outline Offshore Operation and Maintenance Plan (OOMP)

2.1 Draft Development Consent Order

27. **Table 2.2** provides a summary of the consultation undertaken to date in relation to the draft DCO and DML. Thereafter, **Table 2.3** sets out the topics agreed, in discussion or not agreed with the MMO as informed by the consultation and information exchanged between the Applicant and the MMO during the pre-application and examination phases of the Application.

Table 2.2 Summary of consultation with the MMO regarding the draft DCO and DML

Date	Contact type	Owner	Topic
Pre-application			
29 th November 2023	Draft DCO and DML issued for review	Applicant	Draft DCO and DML
Post-application			
August 2024	Provision of Relevant Representation	MMO	Draft DCO and DML
November 2024	Provision of a Written Representation	MMO	Draft DCO and DML
December 2024	Provision of Deadline 2 submission	MMO	Draft DCO and DML
10 th July 2024	Meetings were held to discuss the approach to the SoCG.	Applicant	Draft DCO and DML
15 th August 2024		Applicant	Draft DCO and DML
30 th September 2024	Meeting with the MMO to discuss Relevant Representation	Applicant	Draft DCO and DML
6 th November 2024		Applicant	Draft DCO and DML
14 th January 2025	A meeting was held to discuss Deadline 2 submissions provided by the MMO in December 2024.	Applicant	Draft DCO and DML
14 th February 2025	A meeting was held to discuss Deadline 2 submissions provided by the MMO in December 2024.	Applicant	Draft DCO and DML

Table 2.3 Topics agreed, in discussion or not agreed with the MMO in relation to draft DCO and DML

Topic/ref.	Applicant's position	MMO position	Position summary
Details of Licensed Marine Activities			
MMO DML 1	<p>Wording of Section 2(d), 8 and 9(1) are appropriate and adequate.</p> <p><i>[Details of licensed marine activities]</i></p>	<p>In the MMO Relevant Representation (RR), queries in relation to the condition wording have been raised by the MMO. The Applicant responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that they welcome the update, noting that if these surveys were assessed within the ES then this could be part of the DML, it would just have to be clear within the DML when commencement begins in relation to the surveys and when method statements would be agreed and how the conditions are worded for any submissions post consent. This is linked to materiality comments below. The MMO is finalising this position moving to agreement and will provide confirmation at Deadline 5.</p>	In Discussion – expected to be agreed before the end of examination
Conditions of the Deemed Marine Licence			
MMO DML 2	<p>Timescales for the approval of all plans and documentation is appropriate and adequate.</p> <p>The Applicant has provided a list of documents where 6 months would be acceptable and made updates to the dDCO at deadline 4.</p>	<p>The MMO have responded in their Deadline 2 submission (REP2-035) that they are open to discussions with both the Applicant and NE on which documents can be 4 months and are in discussion with the Applicant to confirm those that have been amended to 6 months.</p>	In Discussion – submission timescales expected to be agreed before the end of examination.

Topic/ref.	Applicant's position	MMO position	Position summary
			It is not expected that the determination date of 4 months (condition 10(1)) will be agreed by the MMO
MMO DML 3	Based on the outcome of the EIA assessment no sediment sampling has been proposed by the Applicant. Pre and post construction bathymetric surveys are included but there is no identified requirement for additional benthic and sediment sampling beyond that undertaken to support the EIA baseline.	In the MMO RR, queries in relation to a sediment sampling plan have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO will provide an updated position at Deadline 4.	In Discussion – expected to be agreed before the end of examination
MMO DML 4	Appropriate conditions for the monitoring of piling activity have been included noting that reporting is included in Condition 15, with reporting in Condition 15(3). <i>[Construction monitoring]</i>	In the MMO RR, queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that the response is still being reviewed and the MMO will provide an update to the Applicant at Deadline 4.	In Discussion
MMO DML 5	Wording of Condition 2(3) is appropriate and adequate. <i>(2) (3) No maintenance works authorised by this licence may be carried out until an offshore operation and maintenance plan substantially in accordance with the</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The	Agreed at Deadline 4

Topic/ref.	Applicant's position	MMO position	Position summary
	<i>outline offshore operation and maintenance plan has been submitted to and approved by the MMO in writing.</i>	MMO have responded in their Deadline 2 submission (REP2-035) that they welcome the update to the wording of Condition 2(3).	
MMO DML 6	Wording of Condition 7(6) is appropriate and adequate. <i>(7)(6) The undertaker must ensure that any rock material used in the construction of the authorised project is from a recognised source, free from contaminants and containing minimal fines</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that the response is still being reviewed and the MMO will provide an update to the Applicant at Deadline 4.	In Discussion
MMO DML 7	Wording of Condition 7(10) is appropriate and adequate. <i>(7) (10) All dropped objects which may reasonably be expected to cause a hazard in the marine environment must be reported to the MMO using the Dropped Object Procedure Form as soon as reasonably practicable and in any event within 24 hours of the undertaker becoming aware of an incident. On receipt of the Dropped Object Procedure Form the MMO may require relevant surveys to be carried out by the undertaker (such as side scan sonar) if reasonable to do so and the MMO may require obstructions to be removed from the seabed at the undertaker's expense if reasonable to do so.</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that the response is still being reviewed and the MMO will provide an update to the Applicant at Deadline 4.	In Discussion
MMO DML 8	Wording of Condition 8 is appropriate and adequate. <i>8. If, due to stress of weather or any other cause, the master of a vessel determines that it is necessary to deposit the authorised deposits outside of the Order limits because the safety of human life or of the vessel is threatened,</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that the response is	In Discussion – unlikely to be agreed within examination period

Topic/ref.	Applicant's position	MMO position	Position summary
	<i>within 48 hours the undertaker must notify full details of the circumstances of the deposit to the MMO</i>	welcomed but is still being reviewed and the MMO will provide an update to the Applicant at Deadline 4.	
MMO DML 9	Wording of Condition 9 is appropriate and adequate. <i>[Pre-construction plans and documentation]</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that they note the response and have no further comments at this time.	Agreed at Deadline 4
MMO DML 10	Wording of Condition 13 is appropriate and adequate. <i>[Reporting of engaged agents, contractors and vessels]</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that they welcome the update to the wording of Condition 13.	Agreed
DCO			
MMO DML 11	Wording of Article 7 is appropriate and adequate. <i>[Benefit of the Order]</i>	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that they have	In Discussion – unlikely to be agreed within examination period

Topic/ref.	Applicant's position	MMO position	Position summary
		outstanding concerns on the Benefit of the Order.	
MMO DML 12	Arbitration wording is appropriate.	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO have responded in their Deadline 2 submission (REP2-035) that they note the response and have no further comments at this time.	Agreed
MMO DML 13	Protective Provisions wording is appropriate.	In the MMO RR queries in relation to the wording have been raised by the MMO. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). Following review, the MMO anticipate being able to provide an updated position at Deadline 4.	In Discussion – expected to be agreed before the end of examination

2.2 Project-wide considerations

28. The EIA methodology applied to the Project, as well as the MCZA and HRA screening and approach have been discussed as part of the ETG meetings and via meetings with the MMO.
29. **Table 2.4** provides a summary of the consultation undertaken to date in relation to Project-wide considerations. Thereafter, **Table 2.5** sets out the topics agreed, in discussion or not agreed with the MMO as informed by the consultation and information exchanged between the Applicant and the MMO during the pre-application and examination phases of the Application.

Table 2.4 Summary of consultation with the MMO regarding Project-wide considerations

Date	Contact type	Owner	Topic
Pre-application			
22 nd September 2023	Meeting	Applicant	Update meeting to discuss approach to 'whole project' assessment following comments from the MMO on the PEIR.

Table 2.5 Topics agreed, in discussion or not agreed with the MMO in relation to Project-wide considerations

Topic/ref.	Applicant's position	MMO position	Position summary
EIA – Approach			
MMO EIA 1	<p>The approach to alleviate concerns raised by the MMO around the whole project impacts (considering Generation Assets (the Project) and associated Transmission Assets) are suitable. This has been addressed by the Applicant through the addition of a combined assessment in the cumulative and in-combination assessments (using the PEIR published for the Transmission Assets to inform assessments) in the ES and the MCZA and RIAA. The combined assessment considers the Project plus the Transmission Assets, considering additional effects and impact interactions. Following this, the Project is assessed cumulatively/in-combination with the Transmission Assets and all other scoped in cumulative projects.</p> <p>A summary document (APP-060) is also supplied within the ES to provide an outline of impacts from both Generation and Transmission Assets as a whole. As discussed with the MMO on 22nd September 2023.</p>	<p>As discussed on 22nd September 2023, the MMO agreed with the Applicant's approach to consider the whole project assessment, with a combined effects assessment between the Generation Assets and Transmission Assets contained within the cumulative/in-combination section of each technical ES chapter (as well as the MCZA and RIAA). In addition, an overall summary document (APP-060) has been presented in the ES outlining impacts from both Generation and Transmission Assets as a whole.</p>	Agreed
MMO EIA 2	<p>The definition of 'Minor' in the matrix to determine Effect Significance was updated to remove the wording "unlikely to be important in the decision-making process" to alleviate concerns raised by Natural England (NE) on the PEIR. The 'Minor' effect definition is therefore revised to "Small change in receptor condition, which may be raised as local issues."</p> <p>As discussed with the MMO on 27th November 2023.</p>	<p>As discussed on 27th November 2023, the MMO are aligned with the wording of significance levels used.</p>	Agreed

2.3 Marine ecology

30. The Marine Ecology ETG includes:

- Marine geology, oceanography and physical processes
- Marine sediment and water quality
- Benthic ecology
- Fish and shellfish ecology

31. **Table 2.6** provides a summary of the consultation undertaken to date in relation to the Marine Ecology topic areas. Thereafter, **Table 2.7** sets out the topics agreed, in discussion or not agreed with the MMO as informed by the consultation and information exchanged between the Applicant and the MMO during the pre-application and examination phases of the Application.

Table 2.6 Summary of consultation with the MMO regarding Marine Ecology ETG topics

Date	Contact type	Owner	Topic
Pre-application			
March 2022	Written submission	Applicant	Provision of a draft Generation Assets Scoping Report (FLO-MOR-REP-0007) by Applicant to ETG members for review/comment.
25 th April 2022	Written submission	Applicant	Provision of the benthic characterisation survey plan for collection of baseline data to support the Environmental Impact Assessment (EIA) by the Applicant to ETG members for review/comment (OEL_FLOMOR0222_PEP_V02).
19 th May 2022	Written submission	Applicant	Provision of the 'Marine Ecology ETG 1 Method Statement' (FLO-MOR-MS-0002) by the Applicant to the MMO which provided an overview of the approach to the assessments for marine ecology topics.
June 2022	Report	Applicant	Request for formal Scoping Opinion through the submission of the Morecambe Offshore Windfarm Generation Assets Scoping Report (FLO-MOR-REP-0007) by the Applicant. The Scoping Report outlined the existing environment, the impacts to be assessed in the ES, data gathering and key aspects of the assessment.
9 th June 2022	Meeting	Applicant	Marine Ecology ETG 1: Introduction to the Project, outlined the approach to HRA screening and EIA assessment approach and methodology (including baseline data sets and guidance documents).

Date	Contact type	Owner	Topic
10 th June 2022	Written submission	MMO	Provision of a response on the 'Marine Ecology ETG 1 Method Statement' (FLO-MOR-MS-0002) from the MMO to the Applicant.
13 th July 2022	Written submission	MMO	Provision of a response on the draft Generation Assets Scoping Report from the MMO to the Applicant for consideration (DCO/2022/00001; 20220713)
2 nd August 2022	Written submission	MMO/PINS	Provision of a Scoping Opinion was received from PINS on 2 nd August 2022, which included MMO scoping response (DCO/2022/00001; 21072022).
3 rd August 2022	Written submission	MMO	Provision of a response on the benthic characterisation survey plan from the MMO to the Applicant (SAM/2022/00050).
10 th August 2022	Written submission	Applicant	Provision of MCZA and HRA draft screening reports to ETG members for review/comment.
14 th September 2022	Meeting	Applicant	Marine Ecology ETG 2: Discussion on the Scoping Opinion, presentation of the underwater noise modelling results and results of Project benthic characterisation survey. Discussion of the approach for the draft RIAA and draft MCZA.
14 th October 2022	Written submission	Applicant	Provision of a Technical note (FLO-MOR-TEC-0008) by the Applicant to the MMO outlining the approach to noise impact assessment on fish and shellfish receptors.
24 th October 2022	Email	MMO	Provision of a response on the MCZA and HRA draft screening reports from the MMO to the Applicant (DCO/2022/00001; 20221024).
23 rd November 2022	Meeting	Applicant	Marine Ecology ETG 3: Presentation of high-level results of the PEIR, an overview of the proposed mitigation measures and a discussion of the underwater noise assessment.
5 th December 2022	Written submission	MMO	Response from MMO (DCO/2022/00001: 20221205) on the technical note: Approach to Noise Impact Assessment on Fish and Shellfish Receptors for Generation Assets at Morecambe Offshore Windfarm (FLO-MOR-TEC-0008).
19 th April 2023	Report	Applicant	PEIR (FLO-MOR-REP-0006) submitted by the Applicant as part of statutory consultation between 20 th April and 4 th June 2023 along with the draft RIAA (FLO-MOR-REP-0005) and draft MCZA (FLO-MOR-REP-0051).

Date	Contact type	Owner	Topic
20 th May 2023	Written submission	MMO	Consultation Section 42 response from the MMO on the PEIR, draft RIAA and draft MCZA (DCO/2022/00001: 20230520).
15 th June 2023	Meeting	Applicant	Marine Ecology ETG 4: Discussion on key Section 42 responses on the PEIR, draft RIAA and MCZA reports. Also sought confirmation on approach for the ES, final RIAA and final MCZA. The agreement log to date was presented for comment.
4 th August 2023	Written submission	Applicant	Provision of a Technical Note (FLO-MOR-TEC-0011) to the MMO by the Applicant outlining the approach to marine geology, oceanography and physical processes, and the marine sediment and water quality assessment. Specifically on the justification for the use of a conceptual approach to the physical processes assessment.
5 th September 2023	Written submission	MMO	Provision of a response from the MMO (DCO/2022/00001; 20230905) to the Technical Note (FLO-MOR-TEC-0011).
28 th September 2023	Email	MMO	Confirmation by the MMO that the impact 'remobilisation of contaminated sediments' can be scoped out of all phases of the ES, due to the low levels of contaminants found across the windfarm site.
11 th October 2023	Meeting	Applicant	Marine Ecology ETG 5: Review of Section 42 comments on the PEIR, RIAA and MCZA. Discussion on the proposed updates to the ES (including project parameters and worst case for underwater noise modelling) and review of the agreement log.
23 rd January 2024	Meeting	Applicant	Marine Ecology ETG 6: Review of ES findings and proposed monitoring and mitigations and review of the agreement log.
Post-application			
19 th August 2024	Written submission	MMO	Provision of Relevant Representation (RR-047).
26 th November 2024	Written submission	MMO	Provision of Written Representation (REP1-096).
12 th December 2024	Written submission	MMO	Provision of Deadline 2 Submission (REP2-035 and REP2-036).
10 th July 2024	Meeting	Applicant	Meetings were held to discuss the approach to the SoCG.

Date	Contact type	Owner	Topic
15 th August 2024	Meeting	Applicant	
30 th September 2024	Meeting	Applicant	Meetings were held to discuss the Relevant Representation comments the MMO provided on 19 th August 2024 (RR-047).
6 th November 2024	Meeting	Applicant	
14 th January 2025	Meeting	Applicant	A meeting was held to discuss Deadline 2 submissions provided by the MMO on December 2024 (REP2-035 and REP2-036).
14 th February 2025	Meeting	Applicant	A meeting was held to discuss Deadline 3 submissions

Table 2.7 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Geology, Oceanography and Physical Processes

Topic/ref.	Applicant's position	MMO position	Position summary
EIA – Policy and Planning			
MMO PP 1	All relevant plans and policies have been identified for the EIA assessment and have been appropriately considered.	Discussed during the EPP as described in Table 2.6 and as presented in the ES (APP-044) which listed the plans and policies relevant to the assessment and as noted in the Marine Plan Policy Review (APP-025).	Agreed
EIA – Baseline environment			
MMO PP 2	The study areas and baseline information used for the EIA assessment is appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-044), which outlines the study area and baseline data used to inform the assessment of effects and which addresses Section 42 comments made by the MMO.	Agreed
EIA – Assessment methodology			
MMO PP 3	The impact assessment methodologies and definitions used for the EIA provide an appropriate approach to assessing potential effects of the Project.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-044) which addresses Section 42 comments made by the MMO.	Agreed
MMO PP 4	The worst-case scenario presented in the assessment is appropriate. The two scenarios (30 larger turbines or 35 smaller turbines) are described in the Project Description ES (APP-042).	The MMO would have preferred the two scenarios to have been included in the introduction of APP-044, but note this information is set out within Table 7.2 of APP-044 which outlines the worst case scenarios for marine geology, oceanography and physical processes. The MMO has no further comments to add as this is a minor matter and does not materially affect the application. Therefore, the	Not agreed – no material impact

Topic/ref.	Applicant's position	MMO position	Position summary
		MMO considers this issue not agreed - no material impact.	
MMO PP 5	<p>Appropriate justification has been provided for the conceptual assessment approach for physical processes (using numerical physical processes modelling conducted for the Mona and Morgan Offshore Wind Projects, in addition to modelling available for the Awel y Mor Offshore Wind Farm) and no bespoke numerical modelling is required for the Project.</p> <p>Discussed during the EPP, as described in Table 2.6 and as presented in ES (APP-044).</p>	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-044) which addresses Section 42 comments made by the MMO.	Agreed
EIA – Cumulative Effect Assessment (CEA) methodology			
MMO PP 6	The use of a 30km buffer for screening other plans/projects, and projects selected, in the cumulative assessment allows for impact interactions and additive effects to be appropriately assessed.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-044) which addresses S42 comments made by the MMO.	Agreed
EIA – Assessment conclusions			
MMO PP 7	The conclusions of the Project-alone assessment of effects for construction, operation and maintenance and decommissioning are agreed as presented in the ES (APP-044).	<p>The MMO is content that all significant receptors have been included in regard to coastal processes.</p> <p>The MMO considers that there are no outstanding concerns in relation to this application in regard to coastal processes.</p>	Agreed
MMO PP 8	The conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are agreed as presented in the ES (APP-044).	<p>The MMO is content that all significant receptors have been included in regard to coastal processes.</p> <p>The MMO considers that there are no outstanding concerns in relation to this application in regard to coastal processes.</p>	Agreed

Topic/ref.	Applicant's position	MMO position	Position summary
Mitigation			
MMO PP 9	Given the impacts of the Project, the proposed mitigation outlined for Marine Geology, Oceanography and Physical Processes within the Schedule of Mitigation (APP-144) is appropriate.	The MMO considers that there are no outstanding concerns in relation to this application in regard to coastal processes.	Agreed

Table 2.8 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Sediment and Water Quality

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Policy and Planning			
MMO SQ 1	All relevant plans and policies have been identified for the EIA assessment and have been appropriately considered.	Discussed during the EPP as described in Table 2.6 and as presented in the ES (APP-045) which lists the plans and policies relevant to the assessment and as noted in the Marine Plan Policy Review (APP-025).	Agreed
EIA – Baseline environment			
MMO SQ 2	The study areas and baseline information used for the EIA assessment are appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045), which outlines the study area and baseline data used to inform the assessment of effects and which addresses Section 42 comments made by the MMO.	Agreed
MMO SQ 3	Sampling of Particle Size Analysis (PSA) and contaminants for baseline characterisation are appropriate, including trace metals, polycyclic aromatic hydrocarbons (PAHs), total hydrocarbon concentration (THC), organotins and polychlorinated biphenyls (PCBs).	Discussed during the EPP, as described in Table 2.6 and presented in ES (APP-045). The MMO welcomes justification regarding why additional contaminants have not been analysed to support the disposal site characterisation plan. The MMO is content that the comments provided are sufficient.	Agreed
MMO SQ 4	Wake effects in relation to sediment and water quality are appropriately assessed in the ES.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045) which addresses Section 42 comments made by the MMO.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Assessment methodology			
MMO SQ 5	The impact assessment methodologies and definitions used for the EIA provide an appropriate approach to assessing potential effects of the Project.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045) which addresses Section 42 comments made by the MMO.	Agreed
MMO SQ 6	The worst-case scenario presented in the assessment is appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045) which addresses Section 42 comments made by the MMO.	Agreed
EIA – CEA methodology			
MMO SQ 7	The use of 30km buffer for screening for other plans/projects to be included in the cumulative assessment allows for impact interactions and additive effects to be appropriately assessed. Agreed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045) which addresses Section 42 comments made by the MMO, which outlined the study area and cumulative projects included in the assessment.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-045) which addresses Section 42 comments made by the MMO.	Agreed
EIA – Assessment conclusions			
MMO SQ 8	The conclusions of the Project alone assessment of effects for construction, operation and maintenance and decommissioning are agreed as presented in the ES (APP-045).	Agreed, ES (APP-045) addresses Section 42 comments made by the MMO.	Agreed
MMO SQ 9	The conclusions of the cumulative assessment of effects for construction, operation and maintenance, and decommissioning are agreed as presented in the ES (APP-045).	Agreed, ES (APP-045) addresses Section 42 comments made by the MMO.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
Mitigation			
MMO SQ 10	Given the effects of the Project, the proposed mitigation outlined for Marine Sediment and Water Quality within the Schedule of Mitigation (APP-144) is appropriate.	The MMO are working towards designation of the order limits and expected this will be completed and agreed before the end of examination.	In Discussion – expected to be resolved before the end of examination

Table 2.9 Topics agreed, in discussion or not agreed with the MMO in relation to Benthic Ecology

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Policy and Planning			
MMO BE 1	All relevant plans and policies have been identified for the EIA assessment and have been appropriately considered.	Discussed during the EPP as described in Table 2.6 and as presented in the ES (APP-046) which lists the plans and policies relevant to the assessment and as noted in the Marine Plan Policy Review (APP-025).	Agreed
EIA – Baseline environment			
MMO BE 2	The study areas and baseline information used for the EIA assessment is appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046), which outlines the study area and baseline data used to inform the assessment of effects and which addresses Section 42 comments made by the MMO.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
MMO BE 3	Site-specific benthic characterisation surveys have appropriately enabled baseline characterisation.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046), which outlines the study area and baseline data used to inform the assessment of effects and which addresses Section 42 comments made by the MMO.	Agreed
EIA – Assessment methodology			
MMO BE 4	The impact assessment methodologies and definitions used for the EIA provide an appropriate approach to assessing potential impacts of the Project.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046) which addresses Section 42 comments made by the MMO.	Agreed
MMO BE 5	The appropriate receptors have been assessed within the EIA.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046). The MMO has no concerns in regard to the effects which have been scoped out. These are, namely, sediment bound contaminants and transboundary effects.	Agreed
MMO BE 6	The worst-case scenario presented in the assessment is appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046) which addresses Section 42 comments made by the MMO.	Agreed
EIA – CEA methodology			
MMO BE 7	The use of a 30km buffer for screening for other plans/projects, to be included in the cumulative assessment, allows for impact interactions and additive effects to be appropriately assessed.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-046), which outlined the study area and cumulative projects included in the assessment.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
EIA –Assessment conclusions			
MMO BE 8	The conclusions of the Project alone assessment of effects for construction, operation and maintenance and decommissioning are agreed as presented in the ES (APP-046).	The MMO considers that there are no outstanding concerns in relation to this application in regard to benthic ecology.	Agreed
MMO BE 9	The conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are agreed as presented in the ES (APP-046).	The MMO considers that there are no outstanding concerns in relation to this application in regard to benthic ecology.	Agreed
Mitigation			
MMO BE 10	Given the impacts of the Project, the proposed mitigation outlined for benthic ecology within the Schedule of Mitigation (APP-144) is appropriate.	The MMO considers that there are no outstanding concerns in relation to this application in regard to benthic ecology.	Agreed
RIAA – Assessment methodology and conclusions			
MMO BE 11	The conclusions of the assessment of Project alone effects are agreed.	The MMO defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A
MMO BE 12	The conclusions of the assessment of in-combination effects are agreed.	The MMO defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A
MCZA – Assessment methodology and conclusions			
MMO BE 13	The appropriate MCZs have been screened into the assessment for benthic ecology, as described in the MCZA Screening Report (APP-031).	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA Screening Report (APP-031) which addresses Section 42 comments made by the MMO.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
MMO BE 14	The conclusions of the assessment of Project alone effects are agreed as described in the MCZA (APP-032).	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA (APP-032) which addresses Section 42 comments made by the MMO in respect to wake effects and marine processes. The MMO will confirm overall position on conclusions following further review of documentation. It is noted in the NE RR (ref) there is agreement on the Project alone conclusions.	Agreed at Deadline 4
MMO BE 15	The conclusions of the assessment of in-combination effects are agreed as described in the MCZA (APP-032).	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA (APP-032) which addresses Section 42 comments made by the MMO in respect to wake effects and marine processes. The MMO has no outstanding in-combination concerns.	Agreed at Deadline 4

Table 2.10 Topics agreed, in discussion or not agreed with the MMO in relation to Fish and Shellfish Ecology

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Policy and Planning			
MMO FE 1	All relevant plans and policies have been identified for the EIA assessment and have been appropriately considered.	Discussed during the EPP as described in Table 2.6 and as presented in the ES (APP-047) which lists the plans and policies relevant to the assessment and as noted in the Marine Plan Policy Review (APP-025).	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Baseline environment			
MMO FE 2	The study areas and baseline information used for the EIA assessment is appropriate. It is noted that no site-specific baseline surveys have been required, but Irish Sea herring data has been used and herring spawning heat mapping has been undertaken, to support the baseline understanding and ES assessment.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-047) which outlines the study area and baseline data used to inform the assessment of effects and addresses Section 42 comments made by the MMO.	Agreed
EIA – Assessment methodology			
MMO FE 3	The appropriate receptors and impacts have been assessed within the EIA, as discussed during the EPP (Table 2.6) and as presented in the ES (APP-047), which outlines the impacts scoped in and out.	The MMO is content that all relevant impacts to fish and fisheries have been identified and assessed and has no comments on shellfish ecology.	Agreed
MMO FE 4	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential impacts of the Project.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-047) which outlines the approach to assessing impacts and addresses Section 42 comments made by the MMO.	Agreed
MMO FE 5	A qualitative assessment for basking shark collision risk is appropriately provided.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-047) which outlines the basking shark assessment and addresses Section 42 comments made by the MMO.	Agreed
MMO FE 6	The worst-case scenario presented in the ES assessment (APP-047) is appropriate. It is noted that the worst-case for underwater noise modelling considers the largest hammer energy, and the highest strike rate, and includes either three sequential monopiles or four sequential pin piles in a 24hr period. The pile diameter	The MMO and Cefas note a minor discrepancy in the project description. Table 5.5 in Chapter 5 Project Description (APP-042) states that the maximum pile diameter (m) for multi-legged pin piled jacket WTF/OSP foundations is 3m, whereas the	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
	<p>modelled for pin-piles and monopiles is precautionary as it is 2m larger than that listed in the Project Description (APP-042) (following reductions made by the Applicant).</p> <p>The Applicant commits to updated underwater noise modelling to inform the final MMMP, once the selection of foundations has been made post consent, which will inform the appropriate mitigation but this does not influence the outcome of the assessment.</p> <p>UXO assessments would be discussed further post consent via a separate marine licence application.</p>	<p>underwater noise modelling in Appendix 11.1 considers a worst-case scenario of installing 5m diameter pin piles.</p> <p>In the MMO RR, queries in relation to underwater noise modelling have been raised. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). The MMO agree the modelling is suitably precautionary and recommend this is clarified in final documentation.</p>	
MMO FE 7	Fish have been treated appropriately as stationary receptors in underwater noise modelling, as presented in the ES (APP-047).	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-047).	Agreed
EIA – CEA methodology			
MMO FE 8	The use of a 30km buffer (extending to 50km for noise impacts and 100km for migratory species) for screening for other plans/projects to be included in the cumulative assessment allows for impact interactions and additive effects to be appropriately assessed.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-047) which outlines the study area and cumulative projects included in the assessment and addresses Section 42 comments made by the MMO.	Agreed
EIA – Assessment conclusions			
MMO FE 9	With the exception of cod spawning (see MMO FE 11) the conclusions of the Project alone assessment of effects for construction, operation and maintenance and decommissioning are agreed, as set out in APP-047.	The MMO previously recommended that the map legend of Figure 10.6 be updated for transparency/clarity. The Applicant has now provided an updated figure which includes a	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
		legend indicating the number of larvae per m ² which contextualises the high and low 'heat' colours on the map to indicate areas of higher and lower abundance of larvae. The MMO consider this issue resolved.	
MMO FE 10	With the exception of cod spawning (see MMO FE 11) the conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are agreed, as set out in APP-047.	With the exception of cod spawning (see MMO FE 11 below), the MMO agrees that the conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are appropriate, as set out in APP-047.	Agreed
MMO FE 11	The conclusion to the assessment of effects of the Project alone and cumulatively on cod spawning are minor adverse and not significant.	The MMO does not agree that there will be no significant effects to cod. The MMO do not agree with the conclusions of the Project alone or cumulative assessments in relation to effects on cod spawning grounds and recommends seasonal piling restrictions or additional underwater noise mitigation.	Not Agreed – No material impact On the basis of mitigation in MMM FE12

Topic/ref	Applicant's position	MMO position	Position summary
Mitigation			
MMO FE 12	<p>Given the effects of the Project, the proposed mitigation outlined for Fish Ecology within the Schedule of Mitigation is appropriate (APP-144).</p> <p>The Applicant considers that the UWSMS is an appropriate mechanism to control the mitigation required in regards of effects to cod spawning.</p>	<p>The MMO requests that piling is not permitted during the cod spawning season and recommend that a restriction is conditioned on the marine licence. The wording of the proposed condition, including the timing of restrictions, is in discussion.</p> <p>The MMO does not agree that evidence has been demonstrated to be suitable for cod spawning grounds and recommends seasonal piling restrictions, noting additional underwater noise mitigation is within the UWSMS.</p>	In Discussion – disagreement is in regard to the requirement of a condition on the face of the DCO rather than the mitigation itself
RIAA – Assessment methodology and conclusions			
MMO FE 13	The conclusions of the assessment of Project alone effects are agreed.	The MMO note that Section 42 comments have been addressed in relation to the inclusion of relevant sites for fish and defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A
MMO FE 14	The conclusions of the assessment of in-combination effects are agreed.	The MMO defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A

Topic/ref	Applicant's position	MMO position	Position summary
MCZA – Assessment methodology and conclusions			
MMO FE 15	The appropriate MCZs have been screened into the assessment for fish and shellfish, as presented in the MCZA Screening Report (APP-031), noting that shad species are included.	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA Screening Report (APP-031) which addresses Section 42 comments made by the MMO.	Agreed
MMO FE 16	The conclusions of the assessment of Project alone effects are agreed.	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA (APP-032) which addresses Section 42 comments made by the MMO in respect to wake effects and marine processes. The MMO understands NE is content with the MCZA and has no additional concerns.	Agreed at Deadline 4
MMO FE 17	The conclusions of the assessment of in-combination effects are agreed.	Discussed during the EPP, as described in Table 2.6 and as presented in the MCZA (APP-032) which addresses Section 42 comments made by the MMO in respect to wake effects and marine processes. The MMO notes NE has outstanding no concerns relating to MCZA and the MMO is content this can be agreed.	Agreed at Deadline 4

2.4 Marine mammals

32. **Table 2.11** provides a summary of the consultation undertaken to date in relation to the Marine Mammals. Thereafter, **Table 2.12** sets out the topics agreed, in discussion or not agreed with the MMO as informed by the consultation and information exchanged between the Applicant and the MMO during the pre-application and examination phases of the Application).

Table 2.11 Summary of consultation with the MMO regarding marine mammals

Date	Contact type	Owner	Topic
Pre-application			
March 2022	Written submission	Applicant	Provision of a draft Generation Assets Scoping Report (FLO-MOR-REP-0002) by Applicant to ETG members for review/comment.
May 2022	Written submission	Applicant	Marine Mammal EIA Method Statement (FLO-MOR-MS-0003) issued by the Applicant to the MMO, which outlined the approach to characterising the baseline, the EIA methodology, noise modelling approach and potential impacts.
20 th May 2022	Meeting	Applicant	Marine Mammal ETG 1: Introduction to the Project, outlined the approach to RIAA Screening and EIA methodology and approach.
June 2022	Report	Applicant	Request for formal Scoping Opinion through the submission of the Morecambe Offshore Windfarm Generation Assets Scoping Report (FLO-MOR-REP-0007) by the Applicant. The Scoping Report outlined the existing environment, the impacts to be assessed in the ES, data gathering and key aspects of the assessment.
13 th July 2022	Written submission	MMO	Provision of a response on the draft Generation Assets Scoping Report (FLO-MOR-REP-0007) from the MMO to the Applicant for consideration (DCO/2022/00001; 20220713)
2 nd August 2022	Written submission	MMO/PINS	Provision of a Scoping Opinion was received from PINS on 2 nd August 2022, which included MMO scoping response (DCO/2022/00001; 21072022).
10 th August 2022	Written submission	Applicant	Provision of MCZA and HRA draft screening reports to ETG members for review/comment.
31 st August 2022	Meeting	Applicant	Marine Mammal ETG 2: Discussion on the Scoping Opinion, presentation of the

Date	Contact type	Owner	Topic
			underwater noise modelling approach and discussion of the draft RIAA screening.
24 th October 2022	Email	MMO	Provision of a response on the MCZA and HRA draft screening reports from the MMO to the Applicant (DCO/2022/00001; 20221024).
9 th November 2022	Meeting	Applicant	Marine Mammal ETG 3: Presentation of high-level results of the PEIR, an overview of the proposed mitigation measures, CEA and the draft RIAA in-combination assessment.
April 2023	Report	Applicant	PEIR (FLO-MOR-REP-0006) submitted by the Applicant as part of statutory consultation between 20 th April and 4 th June 2023 along with the draft RIAA (FLO-MOR-REP-0005) and draft MCZA (FLO-MOR-REP-0051).
30 th May 2023	Written submission	MMO	Consultation Section 42 response from the MMO on the PEIR, draft RIAA and draft MCZA (DCO/2022/00001: 20230530).
8 th June 2023	Meeting	Applicant	Marine Mammal ETG 4: Discussion on key Section 42 responses on the PEIR and draft RIAA. Also sought confirmation on approach for the ES and final RIAA. The agreement log to date was presented for comment.
14 th August 2023	Written submission	Applicant	Provision of a Technical Note (FLO-MOR-TEC-0012) by the Applicant to the MMO outlining the updated approach to the marine mammal assessment in response to Section 42 statutory consultation comments.
13 th September 2023	Written submission	MMO	Provision of a response from the MMO (DCO/2022/00001; 20230913) to the Technical Note (FLO-MOR-TEC-0012) on the updated approach to marine mammal assessments.
11 th October 2023	Meeting	Applicant	Marine Mammal ETG 5: Review of Section 42 comments on the PEIR, draft RIAA and draft MCZA. Discussion on the proposed updates to the ES (including project parameters and worst case for underwater noise modelling) and review of the agreement log.
31 st January 2024	Meeting	Applicant	Marine Mammal ETG 5: Review of ES findings and proposed monitoring and mitigation and review of the agreement log.
Post-application			
August 2024	Written submission	MMO	Provision of Relevant Representation

Date	Contact type	Owner	Topic
6 th November 2024	Written submission	MMO	Provision of Written Representation (REP1-096).
12 th December 2024	Written submission	MMO	Provision of Deadline 2 Submission (REP2-035 and REP2-036).
10 th July 2024	Meeting	Applicant	Meetings were held to discuss the approach to the SoCG.
15 th August 2024	Meeting	Applicant	
30 th September 2024	Meeting	Applicant	Meetings were held to discuss the Relevant Representation comments the MMO provided in August 2024 (RR-047).
6 th November 2024	Meeting	Applicant	
14 th January 2025	Meeting	Applicant	A meeting was held to discuss Deadline 2 submissions provided by the MMO ON 12 TH December 2024 (REP2-035 and REP2-036).
14 th February 2025	Meeting	Applicant	A meeting was held to discuss Deadline 3 submissions

Table 2.12 Topics agreed, in discussion or not agreed with the MMO in relation to Marine Mammals

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Policy and Planning			
MMO MM 1	All relevant plans and policies have been identified for the EIA assessment and have been appropriately considered.	Discussed during the EPP as described in Table 2.6 and as presented in the ES (APP-048) which lists the plans and policies relevant to the assessment and as noted in the Marine Plan Policy Review (APP-025).	Agreed
EIA – Baseline environment			
MMO MM 2	The data sources used in the EIA to characterise the baseline for marine mammal baseline are appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-048) which addresses Section 42 comments made by the MMO.	Agreed
MMO MM 3	Marine mammal species included in assessments are appropriately identified as harbour porpoise, minke whale, common dolphin, bottlenose dolphin, Risso's dolphin, grey seal, and harbour seal.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-048) which addresses Section 42 comments made by the MMO.	Agreed
MMO MM 4	Density estimates are appropriately based on relevant worst-case (i.e. highest) values considering marine mammal density estimates from site-specific surveys, SCANS-III and SCANS-IV density estimates, Evans and Waggitt (2020), Waggitt <i>et al.</i> (2019) data and Carter <i>et al.</i> , (2022)	The MMO defer to Natural England.	N/A
MMO MM 5	Appropriate management units and reference populations are applied to the assessment.	The MMO defer to Natural England.	N/A

Topic/ref	Applicant's position	MMO position	Position summary
EIA – Assessment methodology			
MMO MM 6	The impact assessment methodologies used for the EIA provide an appropriate approach to assessing potential effects of the Project.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-048) which identifies the assessment approach and addresses Section 42 comments made by the MMO.	Agreed
MMO MM 7	Agreement of potential impacts scoped in the EIA for construction, operation and maintenance and for decommissioning.	The MMO consider all relevant impacts in regard to underwater noise have been scoped in for assessment. Discussed during the EPP, as described in Table 2.6 and presented in the ES (APP-048), which identified impacts scoped in and out of the assessment.	Agreed
MMO MM 8	<p>The worst-case scenario presented in the ES assessment (APP-048) is appropriate.</p> <p>It is noted that the worst-case for underwater noise modelling considers the largest hammer energy, and the highest strike rate, and includes either three sequential monopiles or four sequential pin piles in a 24hr period. The pile diameter modelled for pin-piles and monopiles is precautionary as it is 2m larger than that listed in the Project Description (APP-042) (following reductions made by the Applicant).</p> <p>The Applicant commits to updated underwater modelling to inform the final MMMP, once the selection of foundation type has been made post consent, which will inform the appropriate mitigation but does not influence the outcome of the assessment.</p> <p>UXO assessments would be discussed further post consent via a separate marine licence application.</p>	<p>The MMO note the minor discrepancy. Table 5.5 in Chapter 5 Project Description (APP-042) states that the maximum pile diameter (m) for multi-legged pin piled jacket WTF/OSP foundations is 3m, whereas the underwater noise modelling in Appendix 11.1 considers a scenario of installing 5m diameter pin piles.</p> <p>The MMO agree the modelling is suitably precautionary and recommend this is clarified in final documentation.</p>	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
MMO MM 9	The swim speed for marine mammal species used in the underwater noise assessment are appropriate.	Discussed during the EPP, as described in Table 2.6 and as presented in the ES (APP-048) which lists the swim speeds and addresses Section 42 comments made by the MMO.	Agreed
EIA – CEA methodology			
MMO MM 10	Agreement on the approach to the CEA and on proposed search area and the types of projects included.	Discussed during the EPP, as described in Table 2.11 , the approach to the CEA is outlined in the ES (APP-048), noting the search area for CEA was updated in line with management units from the PEIR on advice from the EPP, as outlined in ETG 5.	Agreed
MMO MM 11	Six-month cut-off date ahead of DCO submission for new baseline information and cumulative project status is appropriate to facilitate assessments.	Discussed during the EPP, as described in Table 2.11 .	Agreed
MMO MM 12	CEA project densities are appropriately used where there is no project specific data.	The MMO defer to Natural England.	N/A
EIA – Assessment conclusions			
MMO MM 13	<p>The conclusions of the Project alone assessment of effects for construction, operation and maintenance and decommissioning are agreed, as presented in APP-048.</p> <p>The Applicant has committed to the consideration of NAS. Further modelling would be undertaken post-consent alongside finalised design details as part of the finalisation of the MMMP and UWSMS.</p>	In the MMO RR, queries in relation to underwater noise modelling have been raised. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). In their Deadline 2 submission (REP2-035), the MMO have advised that if the Applicant is giving any serious consideration to the use of NAS, such as DBBC then they should be presenting UWN	In Discussion – it is expected that this will be resolved during examination

Topic/ref	Applicant's position	MMO position	Position summary
		modelling as evidence that an acceptable reduction in the range of effect from piling noise can be achieved when using NAS/DBBC.	
MMO MM 14	<p>The conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are agreed, as presented in APP-048.</p> <p>The Applicant has provided an UWSMS and updated MMMP that provides mechanisms to secure mitigation post-consent alongside the final Project design information. The CEA undertaken for the Project includes population modelling for piling across multiple OWF sites.</p>	In the MMO RR, queries in relation to underwater noise modelling have been raised. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011). In their Deadline 2 submission (REP2-035), the MMO has stated that they believe the Applicant has not given appropriate consideration to the effects of UWN from piling at multiple OWF sites and the MMO does not support their conclusion that cumulative impacts from piling noise will be minor adverse.	In Discussion – it is expected that this will be resolved during examination
Mitigation			
MMO MM 15	<p>Given the effects of the Project, the proposed mitigation outlined for Marine Mammals within the Schedule of Mitigation is appropriate (APP-144).</p> <p>It is noted that mitigation would be refined though the finalisation of the MMMP.</p>	<p>The MMO welcomes that further assessment would be conducted prior to construction, based on the foundation type and installation method, to determine if there is a risk of significant disturbance to marine mammals. This would then be used to determine if further mitigation measures which reduce sound propagation and disturbance are required.</p> <p>If they are required, then a review would be conducted to determine what is the most appropriate and effective mitigation method based on the latest and available methods prior to construction. This would include a review of</p>	In Discussion – it is expected that this will be resolved during examination

Topic/ref	Applicant's position	MMO position	Position summary
		all suitable noise abatement measures available at that time.	
RIAA –Assessment methodology and conclusions			
MMO MM 16	The conclusions of the assessment of Project alone effects are agreed.	The MMO defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A
MMO MM 17 (MMO MM 18 not used)	The conclusions of the assessment of in-combination effects are agreed.	The MMO defer to Natural England on the RIAA, however, will maintain a watching brief on any HRA matters related to the DML.	N/A
Other matters as required			
MMO MM 19	<p>As agreed through the ETG process a high-level assessment of UXO clearance effects on marine mammals has been provided (APP-048 and APP-067). Updated assessments would be provided if necessary post consent when further information on confirmed UXO is known and presented as part of a separate marine licence for UXO clearance if required.</p> <p>The UXO assessments provided in the ES are suitable and appropriate, with a separate marine licence application to be made post-consent based on the latest guidance at the time of writing</p>	<p>An indicative assessment has been provided, the MMO request that the Acoustic Deterrent Device (ADD) activation times (and mitigation in general) are revisited once further details of any proposed UXO works are known post consent.</p> <p>It is noted that comments related to the UXO assessment are not considered material to the indicative assessment provided and that a separate licence application will be submitted post-consent if needed</p>	Agreed

2.5 Draft, Outline and In-Principle DCO documents

33. A summary of the consultation relating to the following draft, outline and in-principle DCO documents is provided in **Table 2.13**.
- Draft Marine Mammal Mitigation Protocol (MMMP) (APP-149)
34. In Principle Monitoring Plan (IPMP) (APP-148)
- Outline Project Environmental Management Plan (PEMP) (APP-146)
 - Outline Offshore Operations and Maintenance Plan (OOOMP) (APP-150)
 - Sediment Disposal Site Characterisation Report (APP-024)
35. The matters for agreement in relation to the relevant outline plans are provided in **Table 2.14**, noting that discussions identified in prior sections have also been used to inform DCO documents. It should be noted that these agreements are in relation to technical matters only. DCO matters relating to these plans e.g. approval periods, are drawn out in **Table 2.3**.

Table 2.13 Summary of consultation with the MMO regarding draft, outline and in-principle DCO documents

Date	Contact type	Owner	Topic
Pre-application			
2022-2024	Meetings	Applicant	Matters that led to the development of the outline plans were part of the EPP process as described in the Evidence Plan Report within the Consultation Report (APP-016).
May 2023	Report	MMO	MMO Section 42 comments of relevance to the development of the outline plans.
Post-application			
14 th January 2025	Meeting	Applicant	A meeting was held to discuss Deadline 2 submissions provided by the MMO on 12 th December 2024 (REP2-035 and REP2-036).
19 th August 2024	Written submission	MMO	Provision of Relevant Representation (RR-047).
10 July 2024	Meeting	Applicant	Meetings were held to discuss the approach to the SoCG.
15 August 2024	Meeting	Applicant	

Date	Contact type	Owner	Topic
30 September 2024	Meeting	Applicant	Meetings were held to discuss the Relevant Representation comments the MMO provided on 19 th August 2024 (RR-047).
6 November 2024	Meeting	Applicant	
26 th November 2024	Written submission	MMO	Provision of Written Representation (REP1-096).
12 th December 2024	Written submission	MMO	Provision of Deadline 2 Submission (REP2-035 and REP2-036).
14 th February 2025	Meeting	Applicant	A meeting was held to discuss Deadline 3 submissions

Table 2.14 Topics agreed, in discussion or not agreed with the MMO in relation to draft, outline and in-principle DCO documents

Topic/ref	Applicant's position	MMO position	Position summary
MMO OP 1	<p>The Draft MMMP and UWSMS is adequate and appropriate. The final MMMP for piling and required mitigation would be agreed post consent.</p> <p>It is noted that the final MMMP for UXO clearance if required would be updated as part of a separate marine licence post consent based on updated assessment when further details of confirmed UXO have been identified and appropriate mitigation would be agreed.</p> <p>The Applicant confirms that the worst case has been made clearer in the MMMP and will be made clear across all marine mammal documents, which will be submitted at Deadline 4.</p>	<p>In the MMO RR, queries have been raised. The Applicant has responded to this issue in their document 'The Applicant's Response to Relevant Representations' (PD1-011).</p> <p>The MMO welcomes clarification received of the worst case for piling and requests this is made clear in an updated version of the MMMP.</p> <p>The MMO will review updated documents and provide an update at Deadline 5.</p>	In Discussion – likely to be agreed
MMO OP 2	The IPMP is adequate and appropriate, with the final design and scope of monitoring to be agreed as part of the final Monitoring Plan.	The MMO does not have any major comments in regard to the IPMP.	Agreed
MMO OP 3	The Outline PEMP is adequate and appropriate. The final PEMP will be agreed post consent alongside further assessment of final foundation type and installation method.	The MMO does not have any major comments on the Outline PEMP.	Agreed
MMO OP 4	The OOOMP is adequate and appropriate.	To be provided at deadline 4 upon review of documentation, noting that the Applicant has updated the OOOMP and the dDCO to accommodate comments on cable protection in new areas requiring a 10 year limit.	In Discussion – likely to be agreed
MMO OP 5	The Sediment Disposal Site Characterisation Report is adequate and appropriate.	Agreed – MMO SQ 10	Agreed at Deadline 4 (noting MMO SQ 10)

3 Signatures

36. The above draft SoCG is agreed between the MMO and the Applicant on the day specified below.

Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for and on behalf of the MMO	
Signed:	
Print Name:	
Job Title:	
Date:	
Duly authorised for an on behalf of the Applicant	

4 References

Carter, M.I.D., Boehme, L., Cronin, M.A., Duck, C.D., Grecian, W.J., Hastie, G.D., Jessopp, M., Matthiopoulos, J., McConnell, B.J., Miller, D.L., Morris, C.D., Moss, S.E.W., Thompson, D., Thompson, P.M. and Russell, D.J.F. (2022). Sympatric Seals, Satellite Tracking and Protected Areas: Habitat-Based Distribution Estimates for Conservation and Management. *Front. Mar. Sci.* 9:875869

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DESNZ (2024) Overarching National Policy Statement for Renewable Energy Infrastructure (EN-3)

Evans PGH and Waggitt, JJ. (2020). Impacts of climate change on Marine Mammals, relevant to the coastal and marine environment around the UK. Marine Climate Change Impacts Partnership (MCCIP) Annual Report Card 2019 Scientific Review, 1-33.

Morecambe Offshore Windfarm Ltd (2024) Draft DCO (APP-012)

Morecambe Offshore Windfarm Ltd (2024) Consultation Report (APP-015)

Morecambe Offshore Windfarm Ltd (2024) Consultation Report Appendices Part 1 (A to C) (APP-016)

Morecambe Offshore Windfarm Ltd (2024) Sediment Disposal Site Characterisation Report (APP-024)

Morecambe Offshore Windfarm Ltd (2024) Report to Inform Appropriate Assessment (APP-027)

Morecambe Offshore Windfarm Ltd (2024) Habitats Regulations Assessment Screening Report (APP-028)

Morecambe Offshore Windfarm Ltd (2024) Marine Conservation Zone Assessment Screening Report (APP-031)

Morecambe Offshore Windfarm Ltd (2024) Marine Conservation Zone Assessment (APP-032)

Morecambe Offshore Windfarm Ltd (2024) Chapter 7 Marine Geology, Oceanography and Physical Processes (APP-044)

Morecambe Offshore Windfarm Ltd (2024) Chapter 8 Marine Sediment and Water Quality (APP-045)

Morecambe Offshore Windfarm Ltd (2024) Chapter 9 Benthic Ecology (APP-046)

Morecambe Offshore Windfarm Ltd (2024) Chapter 9 Fish and Shellfish Ecology (APP-047)

Morecambe Offshore Windfarm Ltd (2024) Chapter 11 Marine Mammals (APP-048)

Morecambe Offshore Windfarm Ltd (2024) Draft Marine Mammal Mitigation Protocol (APP-049)

Morecambe Offshore Windfarm Ltd (2024) Appendix 11.1 Underwater Noise Assessment (APP-065)

Morecambe Offshore Windfarm Ltd (2024) Appendix 11.2 Marine Mammal Information and Survey Data (APP-066)

Morecambe Offshore Windfarm Ltd (2024) Appendix 11.3 Marine Mammal Unexploded Ordnance Assessment (APP-067)

Morecambe Offshore Windfarm Ltd (2024) Appendix 11.4 Marine Mammal CEA Project Screening (APP-068)

Morecambe Offshore Windfarm Ltd (2024) Appendix 11.5 Marine Mammal Consultation Responses (APP-069)

Morecambe Offshore Windfarm Ltd (2024) Outline Project Environmental Management Plan (APP-146)

Morecambe Offshore Windfarm Ltd (2024) In-Principle Monitoring Plan (APP-148)

Morecambe Offshore Windfarm Ltd (2024) Outline Offshore Operations and Maintenance Plan (APP-150)

Morecambe Offshore Windfarm Ltd (2024) Marine Conservation Zone Assessment - Rev 02 (Clean (AS-004)

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