

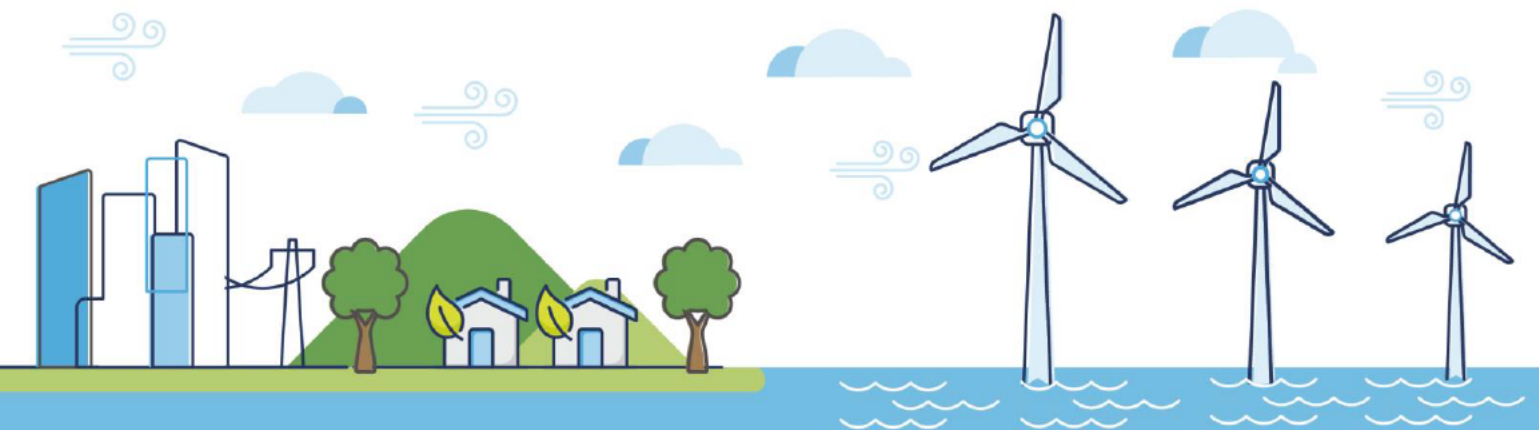
Morecambe Offshore Windfarm: Generation Assets Examination Documents

Volume 9

Statement of Common Ground with the Marine Management Organisation

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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 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 SoCG.
9. The matters considered within this 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 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 SoCG¹

Topic/chapter	Informed by the EPP (Yes/No)	Applicant 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
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 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 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 technical topic below.

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 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 SoCG, alongside further submission from the MMO during examination.

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**, **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

25. 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 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 not agreed
Project-wide considerations	Agreed
Chapter 7 Marine Geology, Oceanography and Physical Processes	Agreed
Chapter 8 Marine Sediment and Water Quality	Agreed
Chapter 9 Benthic Ecology	Agreed
Chapter 10 Fish and Shellfish Ecology	Agreed
Chapter 11 Marine Mammals	Agreed
MCZA	Agreed
Draft, Outline and In-Principle DCO documents	Not agreed (no material impact)

2.1 Draft Development Consent Order

26. **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

Date	Contact type	Owner	Topic
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 3 submissions provided by the MMO in January 2025.	Applicant	Draft DCO and DML
4 th March 2025	A meeting was held to discuss Deadline 4 submissions provided by the MMO in February 2025.	Applicant	Draft DCO and DML
14 th March 2025	A meeting was held to discuss Deadline 5 submissions provided by the MMO in March 2025.	Applicant	Draft DCO and DML
24 th March 2025	A meeting was held to finalise the MMO's position prior to Deadline 6.	Applicant	Draft DCO and DML
7 th April 2025	A meeting was held to finalise the MMO's position prior to Deadline 5A.	Applicant	Finalisation of the SoCG

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	Wording of Section 2(d), 8 and 9(1) are appropriate and adequate. <i>[Details of licensed marine activities]</i>	In the MMO's Deadline 3 response, they note that they have reviewed amended wording to Section 2(d) and do not consider further action necessary. In the MMO's Deadline 5 response, they have confirmed they are content with the wording of Section 8 and 9(1) and consider these matters closed.	Agreed
Conditions of the Deemed Marine Licence			
MMO DML 2a	Timescales for the submission of all plans and documentation is appropriate and adequate, with plans either to be submitted four or 6 months prior to the start of the activity.	The MMO has confirmed timescales for the submission of all plans and documentation and the Applicant has updated the draft DCO in line with advice from the MMO. It is noted that for this Project it has been agreed for some plans to remain at a four month submission timescale.	Agreed
MMO DML 2b	Condition 10 – Approval timescales The Applicant considers the determination period captures the plans, as noted in MMO DML 2a, where it is stated that they are to be submitted 4 months or 6 months prior to the start of the activity and has amended the wording accordingly at Deadline 6. The Applicant is not in a position to reduce the determination period and defers to the SoS in this regard.	The MMO acknowledges the Applicant's comments and has set out reasoning in REP5-075. The MMO's position is that it remains that there should not be a requirement for the MMO to respond within a time period. Should a determination date be included then this should be 6 months (apart from the documents where 4 months is agreed). The MMO has provided comments on the Applicant's proposal for timescales of submission in Table 1 point 1DCO7 of	Not Agreed – Not Material Impact

Topic/ref.	Applicant's position	MMO position	Position summary
		REP5-075 and agrees with the dates proposed as set out above in MMO DML 2a. The MMO notes the ExA has presented a potential of 56 days to determine the documents submitted, the MMO strongly disagrees (although note this as a non-material matter) with this timescale as this is less than the dates agreed with the Applicant and interested parties. The MMO believes it is for the SoS to decide on if this should be included.	
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. The Applicant provided a Sediment Disposal Site Characterisation Report (APP-024), which includes details on sampling that was carried out during the pre-application process. Therefore, no further sampling is considered to be required. As such, the Applicant does not consider that a DML condition is required.	In the MMO's Deadline 3 response, the MMO confirm they are content a new condition is not required and that this can be closed.	Agreed
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). Given the size of the Project, timeframe for piling, and site conditions, it is not considered that additional monitoring is required. <i>[Construction monitoring]</i>	The MMO considers that representation of the worst case should be undertaken but agrees that for this Project this is not a material consideration.	Not agreed – no material impact

Topic/ref.	Applicant's position	MMO position	Position summary
MMO DML 5	Wording of Condition 2(3) is appropriate and adequate. <i>[maintenance works]</i>	The MMO confirmed they are content with the wording changes to Condition 2(3).	Agreed
MMO DML 6	Wording of Condition 7(6) is appropriate and adequate. <i>[Source of rock material]</i> The Applicant has included that details of the source of scour protection would be provided in the Outline CMS and Outline Scour Protection and Cable Protection Plan at Deadline 5.	In the MMO's Deadline 5 response, the MMO confirms they are content with this approach.	Agreed
MMO DML 7	Wording of Condition 7(10) is appropriate and adequate. <i>[Dropped objects]</i>	The MMO agrees the condition included in the DCO submitted at Deadline 5a (REP5a-002).	Agreed
MMO DML 8	Wording of Condition 8 is appropriate and adequate. <i>[Force majeure]</i> The Applicant acknowledges the fundamental difference in position and interpretation, and notes the MMO position is taken across the industry and is not Project specific.	The MMO maintains its position that the removal of the condition is due to the liability and enforcement issue post consent and ambiguity of 'any other cause' within the condition. The MMO welcomes the update suggested by the ExA to include 'any other unforeseeable cause' and that does alleviate some concerns however the MMO still believes the condition isn't required.	Not agreed – material impact
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	Agreed

Topic/ref.	Applicant's position	MMO position	Position summary
		2 submission (REP2-035) that they note the response and have no further comments.	
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
MMO DML 11	Condition 20 - UWSMS The Applicant considers that the UWSMS is an appropriate mechanism to control the mitigation required for potential effects to cod spawning, however has included a condition on the face of the DCO should the ExA and SoS agree with the MMO that this is required.	The MMO requests that piling is not permitted during the peak cod spawning season unless suitable evidence is provided in regard to a reduction of impacts and strongly request that a restriction is conditioned on the marine licence. The wording of the proposed condition, including the timing of the restriction, is agreed.	Not agreed – no material impact (on the basis that the condition is provided in the dDCO)
DCO			
MMO DML 12	Wording of Article 7 is appropriate and adequate. <i>[Benefit of the Order]</i> The Applicant acknowledges the fundamental difference in position and interpretation, and notes the MMO position is taken across the industry and is not Project specific.	The MMO note in their Deadline 5 submission that they maintain their position that they strongly disagree with the inclusion of Article 7. This position has not changed in light of the recent SoS decision on the Rampion 2 Offshore Wind Farm as further reasoning has been provided within this examination	Not agreed – material impact

Topic/ref.	Applicant's position	MMO position	Position summary
		that wasn't been taken into account within the Rampion determination.	
MMO DML 13	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.	Agreed
MMO DML 14	Protective Provisions wording is appropriate.	N/A	N/A
MMO DML 15	Wording of Condition 9 is appropriate and adequate, which has been updated in response to the wording for the chemical condition provided by the MMO. <i>[Pre-construction plans and documentation including chemical conditions]</i>	Wording has been agreed and it is understood this will be included in the draft DCO at Deadline 6.	Agreed
MMO DML 16	Schedule 2 Requirement 1 – Time limits/Lifespan The Applicant considers that replacement of foundations is not permitted in the DCO, and given the lifespan of the foundations, this would effectively control the need for a new licence or variation. Definition of works must also be inline with the ES which does not include repowering.	The MMO wanted to highlight to the ExA and SoS that there may be a benefit to including an end date of the O&M phase within the DCO and DML in relation to the lifespan of the project to ensure that it is clear that any repowering etc. would be subject to a new consent or variation. The MMO notes that Marine Licences have end dates for all construction and maintenance activities and there is a clear line when a new consent is required.	Not agreed – no material impact
MMO DML 17	Adaptive management	The MMO notes that if impacts are higher than predicted we can utilise Section 72 of	Not agreed – no material impact

Topic/ref.	Applicant's position	MMO position	Position summary
	<p>The Applicant does not consider it necessary or reasonable for blanket adaptive management provisions to be included in the DML given the level of significance identified across topics and the location of the Project outside of any designated site. This would create also uncertainty for the Project in terms of the scale of contingency required and associated financial implications.</p>	<p>2009 Act and vary the marine licence to request adaptive management, but believes this Condition gives a clear process to all and allows for proactive management rather than reactive management by the MMO.</p> <p>The MMO does have a standard condition that is being requested within other examinations. However, notes that as this has not been discussed with the Applicant to date or within this examination and highlights there is not much time to respond to this request.</p> <p>The MMO aims to implement a more proactive process to manage issues in the event that monitoring shows a greater impact than that assessed in the Environmental Statement.</p> <p>The MMO acknowledges that adaptive management has been acknowledged as a possibility within the IPMP.</p>	
MMO DML 18	<p>Inclusion of disposal site name on face of DCO</p> <p>The Applicant notes that as the disposal site permitted for the Project reflects the order limits, there is no requirement to further add the disposal site name to the face of the DCO. The disposal site reference number encompasses a wider area (in relation to other projects), as the Project can only dispose within the order limits it cuts across the condition.</p>	<p>The MMO would like to note that this disposal site has been designated and the reference number should be updated within the DML, the reference number is IS156 and the name of the site is the Morgan and Morecambe OWFs</p> <p>The MMO requested the disposal site identification number is stated in the DML however acknowledges the position of the Applicant in relation to the overlapping disposal site with another project.</p>	Not Agreed – no material impact.

Topic/ref.	Applicant's position	MMO position	Position summary
		<p>The MMO agrees that the current wording of the condition means the Applicant can only disposal of within the order limits. However, notes that if the reference number was included then the condition would also reference the order limits therefore there could be no concerns with any disposal in another area of the disposal site outside the order limits.</p> <p>The MMO believes it is for the SoS to decide on if the reference should be included but it is not a material impact as the reference number has been provided to the Applicant and they would still be bound to that disposal site within the order limits.</p>	

2.2 Project-wide considerations

27. 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.
28. **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

29. The Marine Ecology ETG includes:

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

30. **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
4 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 4 submissions
14 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 5 submissions
24 th March 2025	Meeting	Applicant	A meeting was held to finalise the MMO's position prior to Deadline 6.
7 th April 2025	Meeting	Applicant	Finalisation of the SoCG

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) and reflected in the introduction of Chapter 7 Marine Geology, Oceanography and Physical Processes (APP-044). This was also clarified further in the Chapter at Deadline 5A (REP5a-015).	The MMO requested that the two scenarios should be included in the introduction of APP-044 (but acknowledge that this information is set out within Table 7.2 of APP-044).	Agreed

Topic/ref.	Applicant's position	MMO position	Position summary
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 has confirmed in their Deadline 5 submission that a disposal site has now been designated and considers this matter closed.	Agreed (see MMO DML 17)

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
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

Topic/ref	Applicant's position	MMO position	Position summary
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 (RR-061) there is agreement on the Project alone conclusions.	Agreed
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 turbid wake effects and marine processes. The MMO has no outstanding in-combination concerns.	Agreed

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 considers 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, however appropriate mitigation is in place.	The MMO do not agree with the conclusions of the Project alone or cumulative assessments in relation to effects on cod spawning grounds, however do agree that appropriate mitigation is in place.	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
Mitigation			
MMO FE 12	Given the effects of the Project, the proposed mitigation outlined for Fish Ecology within the Schedule of Mitigation, which includes the UWSMS is appropriate (REP5-021).	The MMO is content with the mitigation proposed, however see MMO DCO 11 in regard to the mitigation mechanism.	Agreed
RIAA – Assessment methodology and conclusions			
MMO FE 13	The conclusions of the assessment of Project alone effects are agreed.	The MMO notes that Section 42 comments have been addressed in relation to the inclusion of relevant sites for fish and defers 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 defers 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 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

Topic/ref	Applicant's position	MMO position	Position summary
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 turbid 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

2.4 Marine mammals

31. **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
4 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 4 submissions
14 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 5 submissions
24 th March 2025	Meeting	Applicant	A meeting was held to finalise the MMO's position prior to Deadline 6.
7 th April 2025	Meeting	Applicant	Finalisation of the SoCG

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 defers to Natural England.	N/A
MMO MM 5	Appropriate management units and reference populations are applied to the assessment.	The MMO defers 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 defers to Natural England.	N/A
EIA – Assessment conclusions			
MMO MM 13	The conclusions of the Project-alone assessment of effects for construction, operation and maintenance and decommissioning are agreed, as presented in REP5-012.	Agreed	Agreed
MMO MM 14	The conclusions of the cumulative assessment of effects for construction, operation and maintenance and decommissioning are agreed, as presented in REP5-012.	Agreed	Agreed

Topic/ref	Applicant's position	MMO position	Position summary
	The Applicant has provided an UWSMS and 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.		
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 and UWSMS.</p>	<p>The MMO welcomes the updates made in relation to new noise policies and is largely in agreement with the updates.</p> <p>The MMO strongly advise that Noise Abatement Systems (NAS) will likely be required for all piling in the coming years but considers the UWSMS will be used to determine the mitigation requirements. The MMO defers to NE in relation to the worst case and commitment to NAS in the UWSMS and on the DCO.</p> <p>The MMO notes the Applicant has put in a without prejudice condition in for commitment to provide NMS/NAS should the design require it. The MMO has agreed this wording.</p>	Agreed
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

Topic/ref	Applicant's position	MMO position	Position summary
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

32. 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)
33. 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)
34. 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
4 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 4 submissions
14 th March 2025	Meeting	Applicant	A meeting was held to discuss Deadline 5 submissions
24 th March 2025	Meeting	Applicant	A meeting was held to finalise the MMO's position prior to Deadline 6.
7 th April 2025	Meeting	Applicant	Finalisation of the SoCG

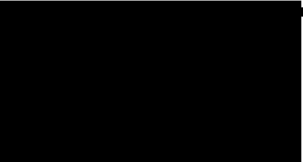

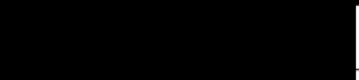

Table 2.14 Topics agreed, in discussion or not agreed with the MMO in relation to draft, outline and in-principle DCO documents

Topic/ref	Applicant's position	MMO position	Position summary
MMO OP 1	<p>The Draft MMMP and UWSMS are adequate and appropriate.</p> <p>The final MMMP and UWSMS 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 has added to the MMMP at Deadline 5a commitment to the current guidance for breaks in piling but noted that this would be further discussed and agreed post consent.</p>	<p>The MMO welcomes the updates made in relation to new noise policies and is largely in agreement with the updates.</p> <p>The MMO strongly advise that Noise Abatement Systems (NAS) will likely be required for all piling in the coming years but considers the UWSMS will be used to determine the mitigation requirements. The MMO defers to NE in relation to the worst case and commitment to NAS in the UWSMS and on the DCO.</p> <p>The Applicant submitted an updated MMMP and UWSMS at Deadline 5a.</p> <p>From the MMO's position we are content with the updates noting the outstanding issues and updates required are with NE and NRW and is hopeful these have been resolved with these updates.</p> <p>The MMO notes any further updates at Deadline 6 would be likely to be agreed.</p>	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

Topic/ref	Applicant's position	MMO position	Position summary
MMO OP 4	The OOOMP is adequate and appropriate. This was updated at Deadline 5 to address matters raised by the MMO.	The MMO requested in their Deadline 4 submission that several clarifications be made to Table 4.1 in their Deadline 4 response. Now they are included, the MMO considers this matter closed.	Agreed
MMO OP 5	The Sediment Disposal Site Characterisation Report is adequate and appropriate.	Agreed.	Agreed
MMO OP 6	The Applicant maintains that a decommissioning programme would be submitted post-consent. The Applicant has updated the Commitments Register at Deadline 5a and commit to submitting the initial decommissioning programme and all updated programmes to the MMO prior to the submission to the SoS, in line with the MMO's request at Deadline 5 (REP5-076).	The MMO requested that a decommissioning programme should be submitted during the consenting process. They do note however in their Deadline 5 submission, that at this stage of the Examination they welcome a commitment within the commitments register to review the initial decommissioning programme and all updated programmes prior to the submission to the SoS.	Not agreed – no material impact

3 Signatures

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

Signed:	
Print Name:	
Job Title:	Marine Licensing Senior Case Manager
Date:	11/04/2025
Duly authorised for and on behalf of the MMO	
Signed:	
Print Name:	
Job Title:	Consent Manager (Morecambe Generation)
Date:	11/04/2025
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

DESNZ (2024) Overarching National Policy Statement for Energy (EN-1)

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.

Ministry of Housing, Communities & Local Government (2015). Guidance Planning Act 2008: Examination of Applications for Development Consent

PINS (2022). SCOPING OPINION: Proposed Morecambe Offshore Wind Farm Case Reference: EN010121.

Waggitt, J.J., Evans, P.G., Andrade, J., Banks, A.N., Boisseau, O., Bolton, M., Bradbury, G., Brereton, T., Camphuysen, C.J., Durinck, J. and Felce, T. (2019). Distribution maps of cetacean and seabird populations in the North-East Atlantic. *Journal of Applied Ecology*, 57(2), pp.253-269.