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Planning Inspectorate
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(Email only)

MMO Reference: DCO/2022/00007
Planning Inspectorate Reference: EN010125
Identification Number: 20050160

25 April 2025

Dear Sir or Madam,

Planning Act 2008, RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd Proposed Dogger Bank South Offshore Wind Farms Order

Deadline 4

On 10 July 2024, the Marine Management Organisation (the MMO) received notice under section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd (the Applicant) for determination of a development consent order for the construction, maintenance and operation of the proposed Dogger Bank South Offshore Wind Farms (the DCO Application) (MMO ref: DCO/2022/00007; PINS ref: EN010125).

The DCO Application seeks authorisation for the construction, operation and maintenance of Dogger Bank South (DBS) Offshore Wind Farm (OWF), comprising of up to 100 wind turbine generators in DBS East and up to 100 wind turbine generators in DBS West together with associated onshore and offshore infrastructure and all associated development (the Project).

The DCO Application includes a draft development consent order (the DCO) and an Environmental Statement (the ES). The draft DCO includes, Marine Licence 1 (Schedule 10), Marine Licence 2 (Schedule 11), Marine Licence 3 (Schedule 12), Marine Licence 4 (Schedule 13) and Marine Licence 5 (Schedule 14) which are draft Deemed Consent (DML) under Part 4 (Marine Licensing) of Marine and Coastal Access Act 2009 (MCAA 2009).

This document comprises of the MMO's Deadline 4.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.



Yours Sincerely,

[Redacted Signature]

[Redacted Name]

Marine Licencing Case Officer

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1. Comments on REP3-005 Applicant's Draft DCO (Revision 6) (Tracked) and REP3-028 The Applicant's Responses to Deadline 2 Documents (Revision 1)

1.1 DCO and DML Major Comments

1.1.1 The MMO submitted comments at Deadline 3 regarding to the DCO and DML and will wait on the Applicant's review of these before adding any more comments. The MMO will provide comments in Deadline 5

1.2 Navigation

1.2.1 The MMO notes the Applicant has updated Condition 11 in line with Relevant Representative comments and notes Trinity House (TH) provided comments on this update. The MMO apologies for the error and has provided the below agreed wording (with TH and Maritime and Coastguard Agency) to the Applicant for updates to the DMLs.

Colouring of structures

11 (1) Except as otherwise required by Trinity House the undertaker must colour all structures forming part of the authorised scheme yellow (colour code RAL 1023) from at least HAT to a height directed by Trinity House or must colour the structure as directed by Trinity House in writing from time to time.

(2) Subject to sub-paragraph (1) above, unless the MMO otherwise directs in writing, the undertaker must paint the remainder of the structures submarine grey (colour code RAL 7035).

1.3 Updates and amendments to Schedules 10, 11, 12, 13 and 14.

1.3.1 The MMO welcomes the Applicant's updates and changes to the following and has no further comments unless otherwise stated:

- i. The definition of Mean High Water Springs.
- ii. The interpretation of "intrusive activities" with the removal of "temporary deposits".
- iii. The removal of "may" for a more definitive phrase in Conditions 1-5 (DML 1 and 2) and Conditions 1-3 (DML 3 and 4).
- iv. The increase in the time period the Applicant needs to submit to the MMO (from four months to six months) on Condition 6 and 7 (DML1 and 2), Condition 4 and 5 (DML 3 and 4) and Condition 2 and 3 (DML5).
- v. The addition of "in writing" within Condition 8 (DML1 and 2), Condition 6 (DML 3 and 4) and Condition 4 (DML 5).
- vi. Condition 9 the undertaker must confirm in writing to the MMO within 28 days of receipt of a copy of this deemed marine licence and any subsequent amendments or revisions to it, those being provided to the persons referred to listed in sub-paragraph (1)(a) must confirm receipt of this deemed marine licence in writing to the MMO that the required information has been provided.
- vii. The inclusion of all relevant work orders in Condition 9(8) (DML 1 and 2), Condition 7(8) (DML 3 and 4) and Condition 5(8) (DML5).

- viii. The addition of “unless otherwise agreed in writing by the MMO” and the inclusion of MCA to Condition 9(9) (DML 1 and 2), Condition 7(9) (DML 3 and 4) and Condition 5(9) (DML5).
- ix. The removal of Condition 15 (4), (5) and (6) in DML 1 and 2). Noting that the MMO still disagrees with Condition 17 (2) in relation to determination dates as set out in AS-169 – Table 1 - Line 82.
- x. The inclusion of provisions of pre and post construction surveys to determine habitat suitability for Sandeel (Condition 20(4)(a) and 22(3)(a) (DML 1 and 2), Conditions 18(4)(a) and 20(3)(a) (DML 3 and 4) and Condition 14(4)(a) and 16(3)(a) (DML5).

1.4 Updates to the Draft DCO

- 1.4.1 The MMO notes the Applicant’s comments and will review these alongside the Applicants Deadline 4 response and provide comments in Deadline 5.

1.5 Benthic

- 1.5.1 The MMO has a relatively limited understanding of the impacts of the construction and operation of OWFs on benthic assemblages, their biodiversity, and, consequently, the ecological functions which they underpin. The MMO welcomes the Applicant’s commitment to undertaking pre-construction surveys to better our understanding of the benthic assemblage within the array area and this should also be followed by suitable post-construction monitoring to gain a better understanding of impact of OWFs on the benthic, and wider, environment.

1.6 Physical Processes

- 1.6.1 In regard to the 30-year operational lifespan on coastal processes. The Applicant has provided a response to this matter, stating “[the Applicant’s] ...*agrees that changes to tidal currents could potentially alter the gradients of sediment transport from one area to another along sediment transport pathways over the 30-year operational lifespan of the Project....Residual sediment transport is approximately south-east to north-west, and so there is potential for less sediment to be transported (supplied) from the south to the north of the arrays, with more sediment from north of the arrays lost further to the north. This could potentially lead to accretion of the seabed in the south with erosion of the seabed in the north*’. Overall, the Applicant concludes the changes will not be significant (since the change to bed shear stress is likely to be less than 3% of the baseline) and therefore there would be no cumulative impacts on sediment transport due to the direction of movement moving away from other offshore wind farms on Dogger Bank.
- 1.6.2 Whilst the predicted change in bed shear stresses is estimated to be relatively small-scale, the MMO would express caution with dismissing the potential for cumulative impact. It may take impacts to sedimentary features many years or decades to manifest changes, but even a small-scale change to the bed shear stresses will, in time, have impacts to the physical environment. Alongside the addition of other long-term developments introducing their own changes to gradients of sediment transport, there is a possibility that over the 30-year operational lifespan and beyond, there will be a cumulative impact on the coastal processes. The MMO agrees with the overall conclusion that the changes will not be significant in the short term but requests the above discussion to be included in the cumulative impacts assessment to acknowledge the possible changes to coastal processes.

1.6.3 No changes in the revised In Principle Monitoring Plan document have been made to the monitoring for the Marine Physical Environment. There is mention of using appropriate geophysical surveys of the area for engineering purposes (pre- and post-construction). The data can also be used for environmental monitoring which is appropriate. Physical change to seabed and sediment type would be reported on as part of the benthic monitoring. This is appropriate.

1.7 Fisheries

1.7.1 The Applicant had the below query regarding Section 2.2.10 of the MMO's Deadline 2 response (REP2-061). The MMO responded via email on 04 April 2025.

"The Applicant's would like the MMO to clarify whether the >600 larvae per metre squared (m²) category consists of anything other than high abundance that would warrant a change to the figure's legend, and if so, what the updated categories should be; bearing in mind the intention of the display of IHLS abundance data in this report as an indicator of spawning activity."

1.7.2 Section 2.2.10 relates to key data which is missing from the Applicant's proposed approach to have the recommended temporal restriction for cable works along the DBS export cable route dismissed, using elements of an approach used for the same purpose for Eastern Greenlink 2^[1] (EGL2) subsea cable. Both the EGL2 cable and the DBS export cable are proposed to run through the Flamborough Head herring spawning ground. The excerpt relates to a concern the MMO had regarding the data underpinning Figure 2.7 (included below) of the Deadline 1 heatmapping report. The first concern was that the Applicant has aggregated 15 years of IHLS data into a single plot which does not fully represent the spatial and temporal fluctuations in herring spawning intensity across the spawning ground over the time period. It is possible for areas of herring spawning grounds where spawning activity was previously low to be recolonised and so it is important to see these data presented as separate maps for each individual year of IHLS data so that the relative importance of the spawning habitat which underlies the ECC can be clearly examined and assessed.

1.7.3 With regards to the Applicant's request for clarification on "whether the >600 larvae per m² category consists of anything other than high abundance", it is not entirely clear what they are asking. In brief, no, the MMO would not expect there to be a category higher than 'high abundance' (assuming the four categories in the Applicant's original plot represent very low, low, medium and high larval abundance, see Figure 1 below), however this is not what the MMO was asking for in previous advice. The MMO apologises if this was unclear. As outlined in the advice, a high abundance category of >600 larvae/m² is not appropriate when presenting larval data for a 15-year period, for the purpose the Applicant is using it for, as it is not uncommon for areas within the main spawning grounds to record thousands, or tens of thousands, of larvae per m² and so a point on the map indicating '>600 larvae/m²' could be representing a density of 601, or 6000 larvae/m², there's no way to differentiate between these values, or from which year of data these values come from. From example an area of spawning ground may have a larval abundance of 6000 larvae/m² at the beginning of the timeseries, but see larval abundances decrease overtime, however this is not reflected on the current presentation.

^[1] EGL2: MLA/2022/00273/1, L/2023/00211/1

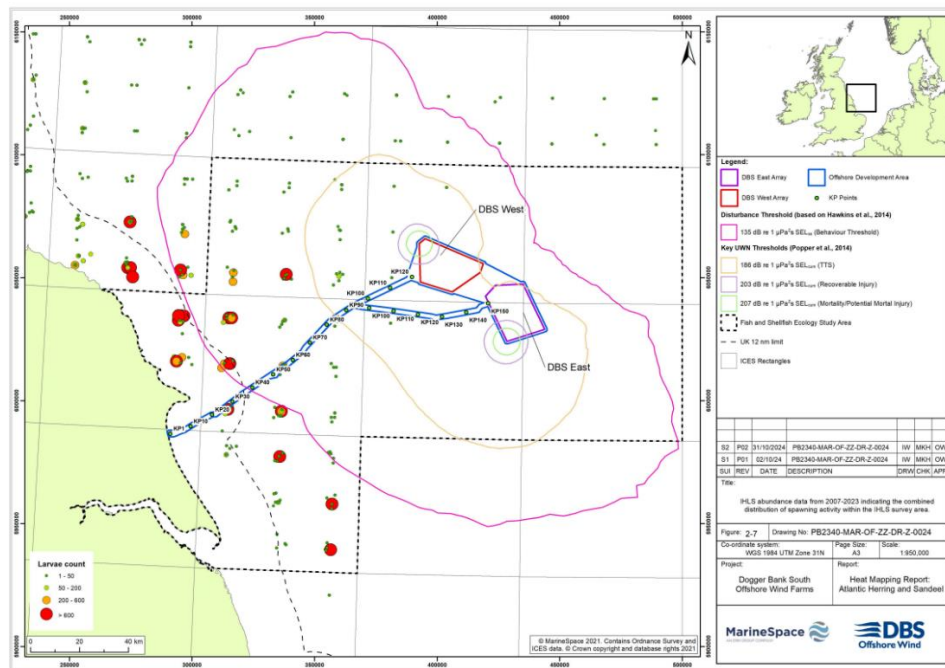


Figure 1 – Figure 2.7 taken from the Deadline 1 Heat Mapping Report

- 1.7.4 In order to fully examine and understand the spatial and temporal variation in herring spawning activity across the spawning ground, relative to the location of the export cable route, it is necessary to see each year of data presented individually with a consistent scale showing contours of larval abundance in m² with a figure legend representing the concentration of larvae within each band. The MMO has included an example of a similar map produced by the Applicant of the Rampion Extension (Rampion 2) OWF project as an example of what we are looking to see (Figure 2 (a-c)).
- 1.7.5 The Applicant should note that each year of data is presented as a separate plot, and that the figure legend corresponds to the varying bands of ‘heat’ with a range of larval abundances. The scale in these example figures from Rampion shows range bands of herring larval abundances which are consistent between figures. The Applicant is already in possession of 15 years of IHLB data as this has been used to provide Figure 2.7 in the original Deadline 1 heatmapping report. In providing each year of IHLB data as standalone annual ‘heat’ maps, the Applicant will demonstrate where there are areas of consistently high or low spawning activity relative to the location of the export cable route. This will support any possible refinement of the recommend restriction on cable works, alongside the other key missing evidence requested section 2.2.10

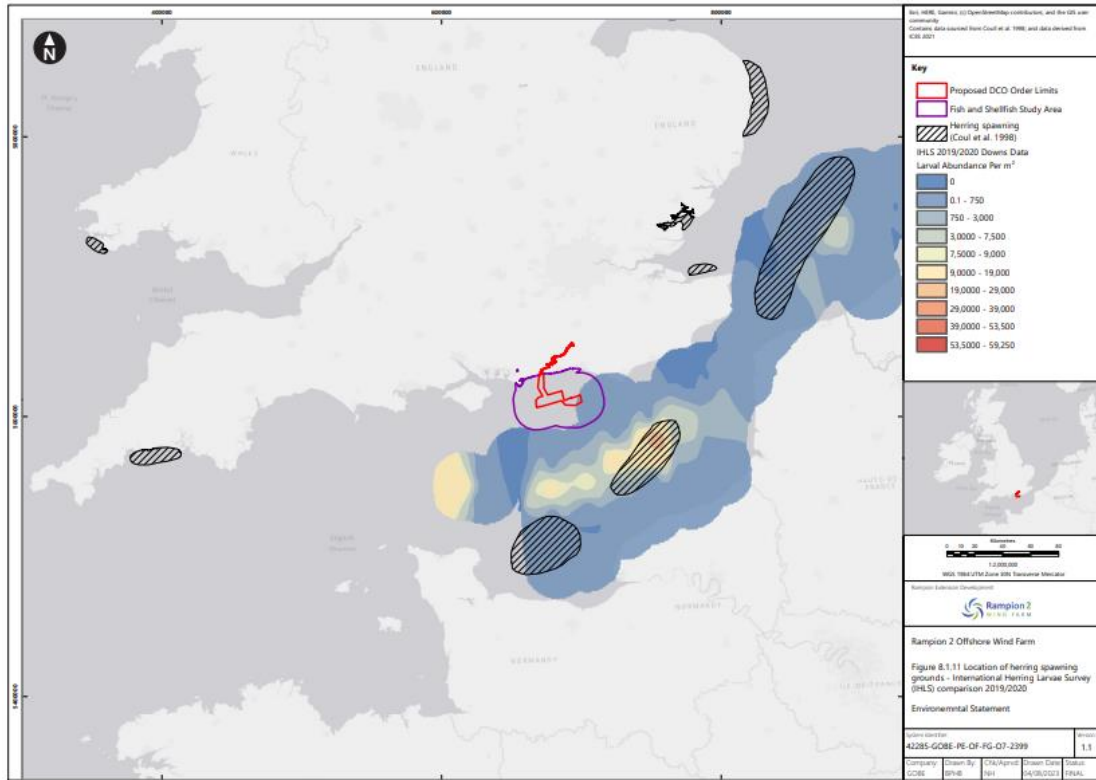


Figure 2a – Maps taken from Rampion 2 extension Offshore Wind Farm

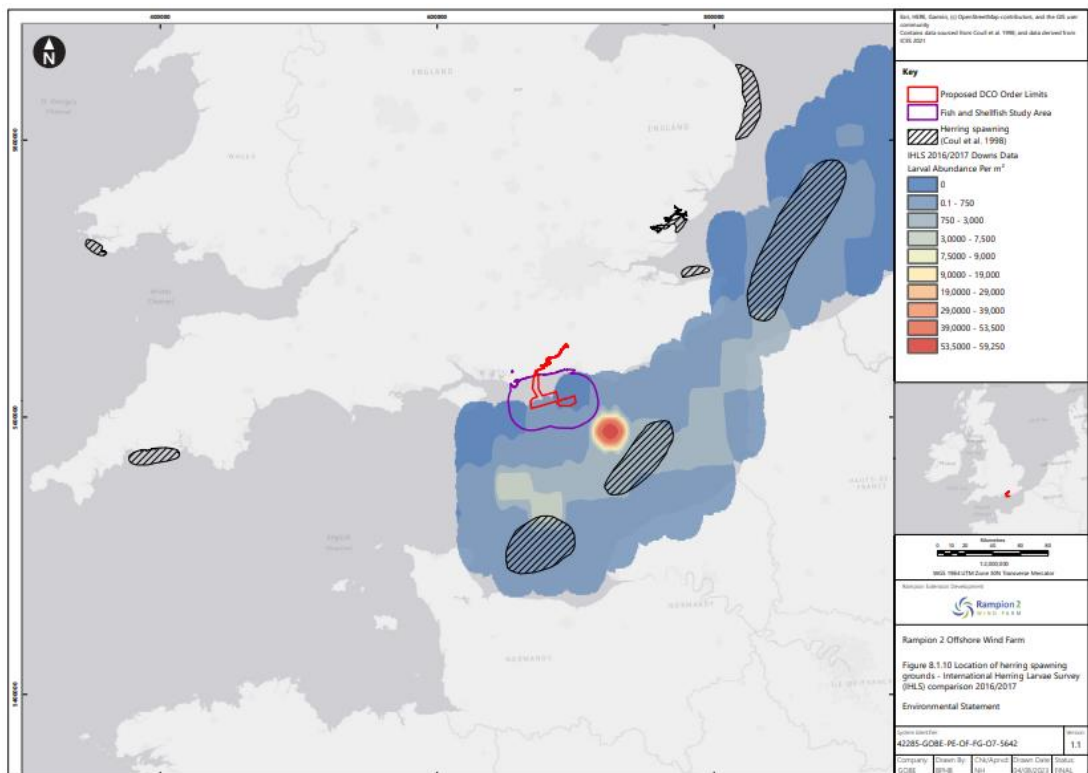


Figure 2b – Maps taken from Rampion 2 extension Offshore Wind Farm

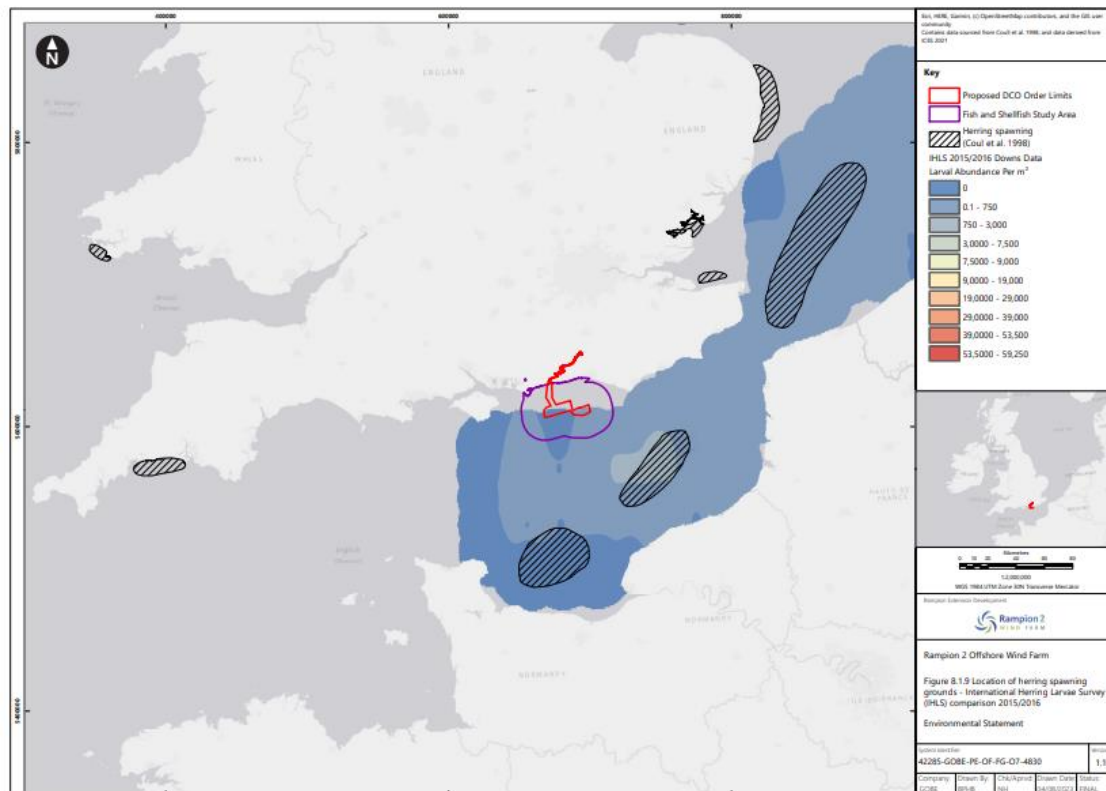


Figure 2c – Maps taken from Rampion 2 extension Offshore Wind Farm

1.7.6 The MMO and our scientific advisors have suggested a meeting to discuss this further and currently arranging this with the Applicant. Any documents or updates that will be discussed should be provided at least two weeks prior to the meeting to ensure the information can be reviewed prior to the meeting.

2. Comments on Applicant's amended application Documents submitted at Deadline 2.

2.1 REP2-036 - Disposal Site Characterisation Report (Revision 2) (Tracked)

2.1.1 The MMO notes that the Draft DCO (Revision 6) states the following maximum volumes for each disposal ground:

- Disposal Ground 1 (DBS East): 4,533,587 cubic metres (m³)
- Disposal Ground 2 (DBS West): 3,940,125 m³
- Disposal Ground 3 (Export Cable): 55,315,523.13 m³

2.1.2 Based on the above volumes, the total disposal quantity would equate to 63,789,235.13 m³. It is not clear why this volume is different to that specified within Table 7-4 of the updated Disposal Characterisation Report (63,734,551 m³). Please can this be clarified.

2.1.3 The MMO also notes that in response to Comment RR-030: 5.3.6 the Applicant acknowledges there is no agreed Action Level (AL) 2 for total hydrocarbon content (THC) and confirmed that references to an AL2 for THC have been removed in the updated Disposal Site Characterisation Report (Revision 2) [document reference 8.18]. However, this does not appear to have been amended, with point 68 stating 'One station

(ST161) in the Offshore Export Cable Corridor exceeded Cefas AL1 for THC, but was below Cefas AL2'. This should be amended in future revisions of the report.

- 2.1.4 The above changes have not changed the Applicant's overall conclusions. Impacts identified from release of suspended sediments including deterioration in water and sediment quality due to the release of contaminated sediments, and potential changes in bed levels from deposition of the disturbed/dredged sediment are mostly assessed to be negligible.
- 2.1.5 Once the information on maximum figures is provided the MMO will work on designating the disposal sites for the references to be included within the DMLs Part 1, Paragraph 2(a) and Part 2 Condition 13 (5).

2.2 REP2-044 - In Principle Monitoring Plan (Revision 2) (Tracked)

- 2.2.1 The In-Principle Monitoring Plan includes an update to the notice period for all pre-construction surveys (from 4 to 6 months) and a commitment to exclude anchoring within the Holderness Inshore Marine Conservation Zone (MCZ) during cable installation operations (document referenced in paragraph 9). The MMO welcomes the 6-month updates and defers to Natural England in relation to the impact to MCZ.

2.3 REP2-052 - Outline Scour Protection Plan (Revision 3) (Tracked)

- 2.3.1 This document has been amended to include a commitment to consider the risks associated with placing plastics (such as frond lines or mats potentially used in some scour protection types) into the marine environment in the final Scour Protection Plan, the MMO welcomes this commitment.
- 2.3.2 Furthermore, the worst-case scenario for scour protection has been updated to reflect the reduction in the number of Offshore Cable Platforms and Accommodation Platforms (2 and 1, respectively) and the removal of Gravity Based structures from the design parameters.

3. Summary of questions asked during the Offshore Environmental Issues Specific Hearing (ISH) 5

3.1 ISH5 – Offshore Coastal Processes, Marine Ecology and Habitats Regulations Assessment (HRA)

- 3.1.1 The MMO has reviewed the following documents and recordings and has answered the questions posed by the Examining Authority (ExA) below:

- EV10-002 – Action Points from Issue Specific Hearing 5 (ISH5) Held on 10 April 2025
- EV10-004 - Transcript of ISH5 – Part 1 – 10 April 2025
- EV10-006 - Transcript of ISH5 – Part 2 – 10 April 2025
- EV10-008 - Transcript of ISH5 – Part 3 – 10 April 2025
- EV10-009 – Recording of ISH5 – Part 4 – 10 April 2025
- EV10-010 - Transcript of ISH5 – Part 14– 10 April 2025

3.2 Action Point 23 – Respond to the applicants' comments during ISH5 on the sound exposure level single strike threshold for the assessment of underwater noise impacts on herring and suggested appropriate behavioural threshold.

3.2.1 The MMO will wait for the Applicant's response in Deadline 4 before commenting in full at Deadline 5.

3.3 Action Point 26 - Consider whether similar conditions to conditions 26 and 28, regarding piling restrictions, in schedule 11 of the recent Rampion 2 made order might be appropriate for the Deemed Marine Licence(s) in the draft DCO.

3.3.1 The MMO and our scientific advisors (Cefas) are content to discuss to agree the inclusion of piling restrictions similar to those within the Rampion 2, Schedule 11. The MMO requests that all the evidence requested to date is provided to enable discussion on what the conditions would look like. The conditions for Rampion 2 were developed through multiple discussions with Rampion 2 alongside further evidence being provided to ensure the MMO and our scientific advisors we content there would be no impact or once the final design was confirmed.

3.3.2 Cefas will not be providing a standalone response as they are the MMO's scientific advisors, and we provide relevant information as part of the planning process in consultation with Cefas.

3.4 Action Point 45 – MMO to respond to the Applicants' comments in ISH5 relating to the worst-case piling scenario(s).

3.4.1 The MMO will wait for the Applicant's response in Deadline 4 before commenting in full at Deadline 5.

3.5 Action Point 47 – Confirm whether the documents submitted by the applicants fully adhere to Defra's Marine Noise Policy paper published 21 January 2025.

3.5.1 The MMO welcomes the updates to the Marine Mammal Mitigation Plan (MMMP) and the Southern North Sea (SNS) Special Area of Conservation (SAC) Site Integrity Plan (SIP) in relation to the Defra Noise Policy paper. The MMO would like to highlight that Defra is intending on publishing further information and clarification in relation to the policy based on feedback from industry representatives and can share this with the Applicant and Examination Authority (ExA) once this has been published.

3.5.2 The MMO also highlights that the intention of the policy paper in managing the increasing level of noise anticipated over the coming years. If noise thresholds are likely to be breached, alone or in-combination with other Projects, the Project may not get approval of the SNS SAC SIP without the use of Noise Abatement or Mitigation Systems (NAS/NMS).

3.5.3 As a Wildlife licence will be required, the Applicant will be required to demonstrate that NAS has been secured, and where this has not been possible, justification must be provided. This is necessary to meet the required legal test to consider satisfactory alternatives, as NAS/NMS is now considered to be a primary and expected mitigation. Applications that do not propose to use NAS/NMS may only be accepted in exceptional circumstances, where an applicant can prove that the inability to secure NAS/NMS is outside of their control. The additional cost of NAS/NMS is not a sufficient justification to discount a satisfactory alternative.

3.5.4 It should be noted that as technology develops and the supply chain improves, any arguments against utilising NAS/NMS will become less valid. Developers who have secured the greatest possible noise reductions through NAS/NMS are less likely to face requests to further explore satisfactory alternatives, and therefore delays in consenting, as they have demonstrated they have utilised best endeavours to secure a '*satisfactory alternative*'.

3.5.5 It should be stressed that the argument for the reduction of noise is not limited to Marine Protected Areas (MPAs) and is not limited to marine mammals only.

3.5.6 The MMO understands that Natural England (NE) are requesting an update to the DML at this stage, noting this request isn't to agree and confirm a specific NAS/NMS (as this can only be decided post consent with the final design) but to provide assurances that if driven piles are used NAS/NMS will be utilised in the first instance.

3.5.7 The MMO highlights and we welcomed the recent inclusion of a commitment to using NAS/NMS on the DML by Morgan Generation OWF (Project EN010136) and Morecambe Generation OWF (on a without prejudice basis) (Project EN010137). The proposed wording was similar to below, noting there are slight variations due to different plans being utilised on the projects:

'(X) In the event that driven or part-driven pile foundations are proposed to be used, a marine mammal mitigation protocol in accordance with the outline marine mammal mitigation protocol, the intention of which is to prevent injury to marine mammals, following current best practice as advised by the relevant statutory nature conservation body, must be submitted to the MMO at least six months prior to the commencement of piling activities. The marine mammal mitigation protocol must include consideration of deployment of noise mitigation systems or noise abatement systems that will be utilised to manage sounds from those piling activities. The marine mammal mitigation protocol must include full details and justification for the mitigation chosen or excluded for deployment.'

3.5.8 Although the policy did not set out a specific licence condition for commitment discussions are still ongoing with SNCBs. It is in the best interest of the Applicant to provide commitment at this stage as failure to acquire and deploy noise reduction methods post consent will only be agreed in exceptional circumstances and should be considered the last resort.

3.6 Action Point 48 – Provide their position and interpretation of ‘first instance’ in paragraph below from the Defra Marine Noise Policy paper published 21 January 2025. ‘all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions through the use of primary and/or secondary noise reduction methods in the first instance.

3.6.1 The MMO would like to highlight that Defra is intending on publishing further information and clarification in relation to the policy based on feedback from industry representatives and can share this with the Applicant and Examination Authority (ExA) once this has been published.

3.6.2 Pile driving in the marine environment has the potential to injure and disturb European Protected Species such as marine mammals. Under regulations 45 and 47 of the Conservation of Offshore Marine Habitats and Species Regulations 2017, it is an offence to injure and disturb protected species and the Government therefore has a legal duty under the Regulations to protect them. Activities that have the potential to injure and disturb protected species may only be licenced to proceed in instances where the relevant authority is satisfied that a series of legal tests are met under The Conservation of Offshore Marine Habitats and Species Regulations 2017.

3.6.3 Amongst other things, the appropriate licensing authority must not grant a licence unless it is satisfied:

- That activity is to be undertaken for a certain purpose, for example scientific research, or is in the public interest
- that there is no satisfactory alternative that will cause less harm to the species
- that the activity does not harm the long-term conservation status of the species

3.6.4 The ‘*satisfactory alternatives*’ test means that any applicant should explore alternative methods for undertaking the activity that would cause less harm to the species and this test may only be met once the appropriate licensing authority is satisfied that there is no alternative method available to the applicant that would cause less harm.

3.6.5 As within Section 3.5 above given the technical advances in relation to NAS and NMS, the first instance means the Applicant has to show there is no satisfactory alternative to cause an impact. The MMO believes that to reduce the noise that NAS/NMS will be required for all projects causing an impact going forward and that it is only the specific type of mitigation that should be discussed post consent.

3.7 Action Point 49 – Respond to the Applicants’ comments during ISH5 in relation to unexploded ordnance clearance.

3.7.1 The MMO is content that the UXO clearance will be a separate Marine Licence and notes that the Applicant will be undertaking further underwater noise modelling which will be submitted with updated impact ranges at the time of application. The MMO will keep a watching brief on this as well as any comments from Natural England.

3.8 Action Point 50 – Provide the applicants with draft condition wording in relation to monitoring and adaptive management provisions with regard to underwater noise.

3.8.1 The MMO provided detail within the Deadline 3 - Additional Submission (AS-169) and will await the Applicant’s response in Deadline 4.

“The MMO is requesting this to implement a more proactive process to manage issues, in the event that post construction monitoring shows a greater impact than that assessed in the Environmental Statement. The MMO is currently experiencing this on Round 1 and 2 offshore wind farms. The additional conditions ensure that all parties are clear what is required if the monitoring shows higher impacts than predicted during the assessment stage. It also allows the Applicant themselves to provide potential solutions when reviewing the results of monitoring, to then be discussed with the MMO and SNCBs.

The aim of the condition is to provide a clear process to the Applicant, the MMO and any consultees if, in preparing the monitoring reports, the Applicant identifies greater impact than the Environmental Statement (ES) predicted rather than a report being submitted and then a discussion having to take place upon review/consultation of the reports.

The MMO notes that if impacts are higher than predicted, the MMO can utilise Section 72 of 2009 Act and vary the marine licence to request Adaptive Management but believes the addition of this condition gives a clear process to all and allows for proactive management by the Applicant, rather than reactive management by the MMO.”

3.9 Action Point 53 – Respond to the applicants’ comments during ISH5 in relation to the degree of commitment to additional noise mitigation and the related adverse effects on Southern North Sea SAC and Humber Estuary SAC.

- 3.9.1 It is noted that the Applicant doesn't agree with the MMO nor NE on this subject. The MMO will await the Applicant's written formal response to this question and will largely defer to NE on commitment to additional noise mitigation and the related adverse effects on the Southern North Sea and Humber Estuary SAC's. The MMO will keep a watching brief of NE's response.

4. MMO comments on Written Representations

4.1 REP3-042 Environment Agency Response to Examining Authority's First Written Questions (ExQ1)

- 4.1.1 The MMO will keep a watching brief on the Applicant's response.

4.2 REP3-043 Historic England Response to Examining Authority's First Written Questions (ExQ1)

- 4.2.1 With regards to section 2.17, the MMO agrees with Historic England for the need for a high resolution marine geophysical survey to be carried out along the planned export cable route. The MMO notes that this is usually done as part of the pre-construction surveys.

4.3 REP3-044 Maritime and Coastguard Agency Response to Examining Authority's First Written Questions (ExQ1) and requests for further information

- 4.3.1 With regards to Q3 SN1.7 the MMO agrees with the Maritime and Coastguard Agency (MCA) on the need for a preconstruction and post construction compass deviation survey and will keep a watching brief on the Applicant's response.

4.4 REP3-051 Natural England Appendix B3 - Natural England's comments and updated advice on Marine Physical Environment EN010125 – Dogger Bank South Offshore Wind Farms Examination Library Document Index

- 4.4.1 The MMO notes that NE has requested clarification as section 8.1.3.3 states that within the arrays, seabed level could be increased by up to 0.5m where multiple cable corridors merge, but in practice the cable layout will be designed to avoid this. The MMO would welcome this clarification.
- 4.4.2 The MMO supports NE's comment that preconstruction surveys should be carried out in areas with mobile bedforms.
- 4.4.3 The MMO will keep a watching brief on the further discussion on implications for cable protection within the 10metre (m) depth contour and will likely provide comments at Deadline 5.

4.5 REP3-052 Natural England Appendix C3 - Natural England's comments and updated advice on Benthic and Intertidal Ecology

- 4.5.1 The MMO notes and supports NE's stance on this subject and will keep a watching brief on any further developments.

4.6 REP3-053 Natural England Appendix E3 - Natural England's comments and advice on Fish and Shellfish

- 4.6.1 The MMO agrees with NE conclusions on this subject and agree that a seasonal restriction is needed to reduce population impacts on the Banks Herring population.

4.7 REP3-054 Natural England Appendix F3 - Natural England's comments and advice on Marine Mammals

4.7.1 The MMO notes and supports the position regarding marine mammals.

4.8 REP3-055 Natural England Appendix H3 - Natural England's comments and advice on Offshore Ornithology Compensation

4.8.1 The MMO notes NE's position on offshore ornithology compensation and will keep a watching brief on further developments in relation to any marine licence requirements.

4.9 REP3-056 Natural England Appendix J - Natural England's comments on the In-Principle Monitoring Plan [APP-247] and [REP2-044]

4.9.1 The MMO notes and supports NE's request for further detail within the IPMP and will keep a watching brief on the Applicant's response.

4.10 REP3-057 Natural England Appendix K - Natural England's Response to The Examining Authority's First Written Questions (ExQ1) and Rule 17 Request dated 3 March 2025 [PD-016]

4.10.1 The MMO will keep a watching brief in regards to offshore ornithology compensation.

4.11 REP3-058 Natural England Appendix L - Natural England's comments and updated advice on Change Request 1

4.11.1 The MMO notes NE's comments to assess the additional cables for possible heat impacts to sandeel.

4.11.2 The MMO agrees with NE regarding the need for clarification as to why pin piling has been referred to but not monopiling.

4.12 REP3-069 The Wildlife Trust Response to Examining Authority's First Written Questions (ExQ1)

4.12.1 The MMO will maintain a watching brief on any future relevant representations from The Wildlife Trust (TWT).

4.12.2 The MMO notes TWT position and disagreement regarding artificial nesting structures as compensation measures. The MMO defers to NE in relation to ornithology compensation matters.

Yours Sincerely,

[Redacted Signature]

[Redacted Name]

Marine Licencing Case Officer

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