

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Annex 5.2 to the Applicant's response to ExA Question GEN2.11 at Deadline 5

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Image of an offshore wind farm

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Glossary

| Term | Meaning |
|---|---|
| Applicant | Morgan Offshore Wind Limited. |
| Development Consent Order (DCO) | An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP). |
| Morgan Array Area | The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located. |
| Morgan Offshore Wind Project: Generation Assets | This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning). |
| The Planning Inspectorate | The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008. |

Acronyms

| Acronym | Description |
|---------|---|
| ADDs | Acoustic Deterrent Devices |
| CMS | Construction Method Statement |
| CSIP | Cable Specification and Installation Plan |
| DCO | Development Consent Order |
| dML | deemed Marine License |
| EMP | Environmental Management Plan |
| ExA | Examining Authority |
| IPMP | In-Principle Monitoring Plan |
| MMMP | Marine Mammal Mitigation Protocol |
| MPCP | Marine Pollution Contingency Plan |
| NAS | Noise Abatement System |
| OOMP | Offshore Operations and Maintenance Plan |
| SBP | Sub Bottom Profilers |
| SNCBs | Statutory Nature Conservation Bodies |
| UWSMS | Underwater Sound Management Strategy |
| UXO | Unexploded Ordnance |

1 ANNEX 5.2 TO THE APPLICANT'S RESPONSE TO EXA QUESTION GEN 2.11 AT DEADLINE 5

1.1 Introduction

1.1.1.1 This document has been prepared in response to Question GEN 2.11 of the Examining Authority's second round of Written Questions addressed to the Applicant. The question is as follows:

Response to Natural England Risk and Issues Log

The Natural England Risk and Issues log [REP4-043] indicates that there are many points that Natural England still has concerns about, coloured red and amber in the log.

The Applicant is asked to:

- i) *Respond specifically to each of the issues where disagreement remains in Tabs A to G. The ExA is specifically seeking a detailed response to all points that remain red and of the highest concern (i.e. A2/A9, B55, C7), with account of any detailed negotiations to resolve those red matters. The ExA requests that the Applicant does not refer the ExA to previous submissions in their answers, rather produces a single document with a response to each amber and red concern.*

Natural England is asked to:

- ii) *Submit a final Risk and Issues log at D6 addressing all the responses submitted by the Applicant, and if there is no change to the status, explain with sufficient detail why. Please expand on any outstanding concerns, and what outcomes, processes, changes to the DCO and/ or to the outline control documents which are required to be able to address or reduce Natural England's concerns.*

1.2 Response

1.2.1.1 The Applicant has prepared this document to consolidate and summarise Natural England's outstanding concerns that are coloured red and amber within the Natural England Risk and Issues Log (REP4-043). Across the entire Risk and Issues Log (REP4-043) there are only three risks classified as red reflecting the relatively low level and number of potential impacts, the ability to mitigate for any potential significant impacts and no adverse effect conclusions (project alone and in-combination).

1.2.1.2 The subsections below provide a summary of the key issues related to each topic where there is an outstanding red or amber concern and account of discussions/progress to resolve these.

1.2.1.3 Appendix A: provides the latest version of the Natural England risk and Issues log with the Applicants response to each amber or red concern at Deadline 5. The Applicant has consolidated any previous responses that have been provided by the Applicant in relation to the specific issues. This summary should be read in conjunction with the detail provide for each outstanding issue in Appendix A.

1.2.2 Development Consent Order and Deemed Marine Licence

1.2.2.1 The Development Consent Order (DCO) and Deemed Marine License (dML) points raised by Natural England are provided within Tab A of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related

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to the DCO and dML are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding **Red** issues:

- **Ref: A2 and A9.** Natural England request that pre-construction documentation under the DMLs is increased from four months to six months.

The Applicant maintains that four months is justified, however in the interest of resolving this matter the draft DCO has been amended at Deadline 5 to require a six month period for submission.

Following these amendments, the Applicant considers this matter resolved.

Summary of outstanding **Amber** issues:

- **Ref: A1 and A5.** Natural England request that unexploded ordnance (UXO) clearance should not be included as a licensed activity within the draft DCO.

The Applicant has provided detailed rationale for seeking to include UXO clearance in the DCO and has removed high order clearance from the draft DCO to resolve this matter at Deadline 5.

The Applicant therefore considers this matter can be resolved.

- **Ref: A3 and A8.** Natural England raise that there is no condition requiring an updated Offshore Operations and Maintenance Plan (OOMP) be submitted, with Statutory Nature Conservation Bodies (SNCBs) consulted prior to approval. They advise that the condition should also secure that no cable protection should be deployed 10 years post construction.

Despite numerous responses from the Applicant detailing its own position on why a time restriction is not what is applied for, is not standard practice and is unnecessary, Natural England has not to justify or explain its own position.

The Applicant awaits any response from Natural England on this matter, but does not anticipate changing its position.

- **Ref: A4 and A11.** Natural England raise that monitoring of marine mammals and offshore ornithology are not secured within the dMLs.

The Applicant has set out its position on this. The Applicant held further discussion with Natural England on 8 January 2025 on why it does not consider ornithological monitoring is merited for this particular development, both in terms of policy and mitigation of impacts to reduce impact levels to not significant and the no adverse effect conclusions. Natural England were not able to engage in detail at this meeting, but agreed to take the Applicants position away for consideration. Discussion is therefore, ongoing with Natural England on this point. The marine mammals meeting arranged has been postponed by Natural England and the Applicant is in discussions with Natural England to rearrange this meeting prior to Deadline 6.

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- **Ref: A7.** Natural England request updated wording in regard to micrositings around conservation features.

The applicant has updated the wording of the draft DCO at Deadline 5 (S_D5_7) to reflect Natural England's request and considers this point resolved.

- **Ref: A10.** Natural England request Underwater Sound Management Strategy (UWSMS) for UXO and piling are provided no later than six months ahead of the activity commencing.

The Applicant considers that the specification of timings in the manner suggested is too prescriptive to be included within the relevant condition of the dML but has updated the draft DCO to allow for a six month determination period as requested by Natural England.

The Applicant therefore considers this matter can be resolved.

1.2.3 Offshore Ornithology

1.2.3.1

The Offshore Ornithology points raised by Natural England are provided within Tab B of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related to Offshore Ornithology are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding Red issues:

- **Ref: B55.** Natural England advised that they were unable to conclude on the project alone assessment due to a number of methodological queries.

The Applicant has submitted additional information into the Examination at Deadline 3 and has provided further information at Deadline 5 following engagement with Natural England between Deadline 4 and Deadline 5.

It is anticipated following the engagement during a meeting on 8 January 2025 that this will close all remaining methodological issues at Deadline 5 for Natural England, Natural Resources Wales and JNCC.

Summary of outstanding Amber issues:

- **Ref: B1, B2, B21, B22, B26, B27, B31, B32, B33, B36, B37, B47, B48 and B49.** Concerns from Natural England relating to:
 - Cumulative Effects Assessment
 - Collision Risk Modelling
 - Seabird count data
 - Kittiwake apportioning
 - Great black-backed gull Population Viability Analysis
 - Displacement rates and mortality rates and
 - CEA gap filling of historical projects.

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The Applicant has submitted additional information into the Examination at Deadline 3 and has provided further information at Deadline 5 (S_D5_16 Ornithological assessment clarification data) following engagement with Natural England between Deadline 4 and Deadline 5.

It is anticipated following the engagement during a meeting on 8 January 2025 that this will close all remaining methodological issues at Deadline 5 for Natural England, Natural Resources Wales and JNCC.

- **Ref: B21.** Concerns from Natural England on the methodology for calculating population density estimates.

The Applicant has previously responded to this and following engagement with Natural England between Deadline 4 and Deadline 5 anticipates this issue to be resolved at Deadline 5.

- **Ref: B22.** Natural England highlighted that SNCB parameters should be progressed through all stages of the assessment.

The Applicant has previously responded to this and following engagement with Natural England between Deadline 4 and Deadline 5 anticipates this issue to be resolved at Deadline 5.

- **Ref: B54.** Natural England is concerned that the Applicant has not proposed any post-consent monitoring in relation to offshore ornithology.

The Applicant has previously provided a response to this and held further discussion with Natural England at a meeting held on 8 January 2025 on why it does not consider ornithological monitoring is merited for this particular development. The arguments made by the Applicant were in line with those presented throughout the Examination to date, including discussion regarding the collaborative strategic research projects the Applicant is involved in such as OWEC and MOTUS. Natural England is reviewing the Applicants position and discussion is ongoing.

1.2.4 Marine Mammals

- 1.2.4.1 The Marine Mammals points raised by Natural England are provided within Tab C of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related to Marine Mammals are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding Red issues:

- **Ref: C7.** Natural England advises the Applicant to commit to using noise abatement (NAS) as mitigation during construction.

The Applicant provided a response at the Deadline 4 submission and welcomes a response from Natural England. The Applicant discussed the forthcoming underwater sound policy regarding NAS during the meeting held on 8 January 2025. As the policy remains unpublished the Applicants position remains that the current wording within the UWSMS is the most appropriate and pragmatic means to deal with this matter (REP4-041.29 and REP4-041.113 in S_D5_4 Applicant's response to IP submissions submitted at Deadline 4 F01). The

Applicant is trying to arrange a meeting in January 2025 with Natural England to discuss the marine mammal outstanding matters.

Summary of outstanding **Amber** issues:

- **Ref: C1, C11 and C35.** Natural England have concerns relating to the assessment methodology and supported the ExA request for further information at ExA Q1 (MM 1.11).

The Applicant provided a response to the ExA Q1 at the Deadline 3 and maintains their position. Natural England is reviewing their response in respect of the additional information previously provided.

- **Ref: C2 and C12.** Natural England have concerns regarding the conclusion of negligible magnitude for injury and disturbance to marine mammals.

The Applicant has previously responded to this and following engagement with Natural England between Deadline 4 and Deadline 5 expects Natural England to be able to confirm this issue has been resolved.

- **Ref: C3 and C13.** Natural England raise that there is an over reliance on Acoustic Deterrent Devices (ADDs) as a key mitigation tool.

The Applicant has previously responded to this and has updated the Marine Mammal Mitigation Protocol (MMMP) at Deadline 5 (document reference S_D5_10) to explain that the prospective effectiveness of ADDs on the primary marine mammal species expected in the area will be conducted at the post-consent stage and will consider carefully the ADD duration to balance the risk of injury with any potential further disturbance from the ADD itself to ensure a proportionate and judicious application of this measure. Following engagement with Natural England between Deadline 4 and Deadline 5, the Applicant expects Natural England to be able to confirm this issue has been resolved.

- **Ref: C4.** Natural England does not support the use of scare charges for UXO clearance.

The Applicant has removed high order UXO clearance from the DCO and therefore the use of scare charges will not be required to be consented as part of the DCO. The Applicant has updated the Marine Mammal Mitigation Protocol (MMMP) at Deadline 5 (document reference S_D5_10) to provide further clarity that in the event that any high order clearance is required, a separate marine licence will be sought. The Applicant expects Natural England to be able to confirm this issue has been resolved.

Ref: C5, C21 and C43. Natural England raise that mitigation measures aimed to reduce marine mammal disturbance should be considered instead of relying on measures for reducing the risk of injury.

The Applicant highlighted that the strategy presented in the Outline UWSMS is for minimising the risk of both injury and disturbance to marine mammals whilst the Outline MMMP is focussed on reducing the risk of injury.

The Applicant expects Natural England to be able to confirm this issue has been resolved.

- **Ref: C8 and C32.** Natural England notes that the Applicant did not propose monitoring for marine mammals within the Mitigation and Monitoring Schedule document and the Offshore In-Principle Monitoring Plan (IPMP).

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The Applicant maintains that, based on the conclusions of the assessment presented for marine mammals (Volume 2, Chapter 4: Marine Mammals), monitoring beyond the underwater sound monitoring is not warranted and nor is the suggestion given by Natural England proportionate to the scale of the effects. The Applicant has responded at Deadline 5 to the ExQ2 MM 2.2 describing the provision of data and strategic research the Applicant is involved with.

The Applicant is trying to arrange a meeting with Natural England to discuss this further and resolve this matter.

- **Ref: C30.** Natural England state there is no requirement to use Acoustic Deterrent Devices (ADDs) during the geophysical surveys.

The Applicant re-iterates that the inclusion of ADDs during geophysical/site-investigation surveys has been removed as a mitigation option in the Outline MMMP.

The Applicant therefore considers this matter can be resolved.

- **Ref: C37.** Natural England disagrees with the conclusion regarding the pre-construction site investigation surveys and raise that there is a need for monitoring to fill the knowledge gap on the impact of Sub Bottom Profilers (SBP) surveys on harbour porpoises.

The Applicant is confident that the inclusion of monitoring (of behavioural responses to SBPs) in the IPMP is disproportionate to the risk, noting that the site-investigation surveys at the Morgan Generation Assets are not a licensable activity.

Following engagement with Natural England between Deadline 4 and Deadline 5, the Applicant expects Natural England to be able to confirm this issue has been resolved.

1.2.5 Physical Processes

- 1.2.5.1 The Physical Processes points raised by Natural England are provided within Tab D of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related to Physical Processes are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding **Amber** issues:

- **Ref: D1, D3, D6, D7, D13, D15.** Natural England request a number of updates to the Application documents.

The Applicant confirms that the refinement to the project parameters will be captured in Volume 2, Chapter 1 Physical processes (APP-013) and Volume 1, Chapter 3, Project description (APP-010) to be submitted Deadline 6.

The Applicant therefore considers these matters can be resolved.

- **Ref: D4.** Natural England request further consideration of the mitigation hierarchy to ensure that environmental impacts are reduced as much as possible.

The Applicant confirmed that the Mitigation and monitoring schedule, now referred to as the Commitments Register, has been revised to include consideration of cable protection which is readily removeable.

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The Applicant therefore considers this matter can be resolved.

- **Ref: D8.** Natural England request further detail on the cable crossing design parameters and impacts assessment.

The Applicant outlined that it is not anticipated that cable crossings will be required as there are no recorded existing cables within the Morgan Array Area, so the location of these crossings, if any are required, is not currently known but will be specified in the Cable Specification and Installation Plan.

The Applicant has engaged with Natural England on this matter and awaits Natural England's comments at Deadline 5.

- **Ref: D9 and D17.** Natural England request further detail to inform Maximum Design Scenario figures for cable repairs, wind turbine generators and offshore substation platform maintenance.

The Applicant has referred Natural England to where this information is presented within the Application documents.

- The Applicant welcomes a response from Natural England to this latest submission. **Ref: D11.** Natural England notes that there are site specific surveys referenced throughout the chapter which have not been provided with the Application documents.

The Applicant has directed Natural England to where all relevant information from the requested reports is available within the application documents.

The Applicant has discussed this during a meeting and Natural England confirmed that the documents have been received and therefore considers the matter can be resolved.

- **Ref: D16.** Natural England raise that impacts of seabed scour due to the presence of windfarm infrastructure during the operation and maintenance phase has not been included as an impact.

The Applicant has provided further detail on the assessment of seabed scour at Deadline 3. The Applicant awaits Natural England's comments at Deadline 5.

- **Ref: D18.** Natural England request further information on the impacts to the wider marine environment and sediment transport budget as a result of sediment extraction in order to stabilise conical gravity based foundations and disposal of ballast at the time of decommissioning.

The Applicant reiterates that during the decommissioning of gravity bases and the removal of ballast material, including sand sequestered during construction, material will not be released back into the local system and beneficial-use of the material will be considered.

The Applicant awaits Natural England's comments at Deadline 5.

- **Ref: D22.** Natural England advises that all embedded mitigation measures proposed should be agreed prior to consent and secured in the DCO/dML and raised concerns about the extent of mitigation proposed for physical processes.

The Applicant confirmed that the Mitigation and monitoring schedule, now referred to as the Commitments Register, has been revised to include consideration of cable protection which is readily removeable. The specific type of scour protection required will be outlined within the Offshore CMS developed in consultation with the MMO and secured within the DCO dMLs.

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The Applicant awaits Natural England's comments at Deadline 5.

- **Ref: D24.** Natural England advises that the Applicant considers using scour and cable protection which is more readily removable at the time of decommissioning.

The Applicant confirmed that the Mitigation and monitoring schedule, now referred to as the Commitments Register, has been revised to include consideration of cable protection which is readily removeable.

The Applicant welcomes a response from Natural England to this latest submission.

1.2.6 Fish and Shellfish

- 1.2.6.1 The Fish and Shellfish points raised by Natural England are provided within Tab E of Natural England's Risk and Issues Log (REP4-043). Natural England have one outstanding red or amber concern related to Fish and Shellfish which is responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding **Amber** issues:

- **Ref: E1 and E3.** Natural England advise that the Schedule of Mitigation and related documents should be updated during the consenting phase.

The Applicant has updated the commitments register at Deadline 4 to address the outstanding concern from Natural England.

The Applicant welcomes a response from Natural England to this latest submission.

1.2.7 Benthic Ecology

- 1.2.7.1 The Benthic Ecology points raised by Natural England are provided within Tab F of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related to Benthic Ecology are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding **Amber** issues:

- **Ref: F1, F5, F6, F10 and F15.** Natural England request a number of updates to the Application documents.

The Applicant confirms that the refinement to the project parameters will be captured in Volume 2, Chapter 2: Benthic subtidal ecology (APP-020) and Volume 1, Chapter 3, Project description (APP-010) to be submitted at Deadline 6.

The Applicant has raised the benthic ecology and physical processes points at a meeting held 8 January 2025 and Natural England stated that many of the points will be resolved at Deadline 5. The Applicant is arranging a meeting to discuss any outstanding matters in January 2025 to resolve for Deadline 6. The Applicant therefore considers the matter closed but awaits confirmation from Natural England at Deadline 5.

- **Ref: F3.** Natural England requests that a commitment is made to remove infrastructure at the time of decommissioning.

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The Applicant provided a response to Natural England on the point relating to securing all embedded mitigation measures in the DCO/dML at the Procedural Deadline and has updated the Commitments register to address this outstanding comment from Natural England.

The Applicant has raised the benthic ecology and physical processes points at a meeting held 8 January 2025 and Natural England stated that many of the points will be resolved at Deadline 5. The Applicant is arranging a meeting to discuss any outstanding matters in January 2025 to resolve for Deadline 6. The Applicant therefore considers the matter closed but awaits confirmation from Natural England at Deadline 5.

- **Ref: F7.** Natural England requests further detail on the cable crossing design parameters and impacts assessment.

The Applicant has provided a full response at Deadline 3 to Natural England's Deadline 2 Written Submission addressing each of the points under Natural England's Best Practice Guidance Phase III in turn.

The Applicant has raised the benthic ecology and physical processes points at a meeting held 8 January 2025 and Natural England stated that many of the points will be resolved at Deadline 5. The Applicant is arranging a meeting to discuss any outstanding matters in January 2025 to resolve for Deadline 6. The Applicant awaits Natural England's comments at Deadline 5.

- **Ref: F9.** Natural England notes that there are site specific surveys referenced throughout the chapter which have not been provided with the Application documents.

The Applicant has directed Natural England to where all relevant information from the requested reports is available within the application documents.

The Applicant has discussed this during a meeting and Natural England confirmed that the documents have been received. The Applicant welcomes a response from Natural England to this latest submission.

- **Ref: F16.** Natural England advises that the Applicant considers using scour and cable protection which is more readily removable at the time of decommissioning.

The Applicant confirmed that the Mitigation and monitoring schedule, now referred to as the Commitments Register, has been revised to include consideration of cable protection which is readily removeable.

The Applicant has raised the benthic ecology and physical processes points at a meeting held 8 January 2025 and Natural England stated that many of the points will be resolved at Deadline 5. The Applicant is arranging a meeting to discuss any outstanding matters in January 2025 to resolve for Deadline 6. The Applicant therefore considers the matter closed but awaits confirmation from Natural England at Deadline 5.

- **Ref: F20.** Natural England acknowledges that the Applicant intends to submit an Outline Offshore Environmental Management Plan (EMP), which will include an Outline Marine Pollution Contingency Plan (MPCP) and outline measures to minimise the potential spread of invasive non-native species.

The Applicant submitted these documents at Deadline 4 and awaits Natural England's comments at Deadline 5.

1.2.8 Other Plans

- 1.2.8.1 The points related to Other plans raised by Natural England are provided within Tab G of Natural England's Risk and Issues Log (REP4-043). Natural England's outstanding red or amber concerns related to Other plans are responded to in full by the Applicant within Appendix A: and can be summarised as follows:

Summary of outstanding **Amber** issues:

- **Ref: G2.** Natural England advise that rather than focusing on the exact details of the surveys, the IPMP should set out the fundamental hypotheses/questions that will be tested by the monitoring.

The Applicant has confirmed that the final monitoring plan developed post consent will set out the specific hypotheses to be tested, monitoring objectives and duration of surveys. The Applicant has provided further updates to the Offshore IPMP including adaptive measures at Deadline 5 (S_D5_21).

- The Applicant welcomes a response from Natural England to this latest submission. **Ref: G3.** Natural England request that adaptive management be secured via the DCO/dML.

The Applicant has previously set out its position as to why a blanket requirement for adaptive management and monitoring is not justified or required. The Applicant has updated the Offshore IPMP and provided a response to the ExQ2 GEN 2.9 at Deadline 5 (S_D5_21) to highlight all adaptive measures that are in place.

The Applicant considers this matter now closed.

- **Ref: G4 and G7.** Natural England request that an outline decommissioning plan should be submitted into examination.

The Applicant previously responded stating that that a separate legislative regime is in place under the Energy Act 2004 to control the decommissioning process for offshore renewable energy installations and that it is not considered necessary or appropriate to duplicate this through consents issued under the Planning Act 2008.

The Applicant considers this matter to be closed.

- **Ref: G6.** Natural England advise the Applicant considers lessons learnt from other wind farm projects in relation to potential scour and cable exposure.

The Applicant confirmed that the project design envelope for operations and maintenance activities has been informed by industry experience of the Applicant on other offshore wind assets including lessons learnt and will also inform the final Offshore Construction Method Statement (CMS).

The Applicant considers this matter now closed.

- **Ref: G8 and G9.** Natural England notes that the applicant intends to consider the selection of scour protection methods post consent. We maintain that the options for scour prevention and cable protection should be agreed as part of the consenting phase.

The Applicant provided an Outline CMS, which incorporates an Outline Cable Specification and Installation Plan (CSIP) at Deadline 4.

The Applicant awaits Natural England's response at Deadline 5.

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- **Ref: G10.** Natural England requested that an outline OEMP be provided into the Examination.

The Applicant has provided an Outline EMP which was submitted into the Examination at Deadline 4 (REP4-032) and awaits Natural England's comments at Deadline 5.

- **Ref: G13 and G14.** Natural England request sufficient information should be provided at the pre-consent stage to allow operations and maintenance (O&M) activities to be fully assessed.

The Applicant has provided an Outline OOMP (APP-079) as part of the Morgan Generation Assets application and reiterates that operations and maintenance activities have been fully assessed within the application.

- **Ref: G16.** Natural England advise that deployment of scour/cable protection under the DCO should be no later than 10 years post construction.

The Applicant does not consider there to be any reasonable basis on which to impose a time-limit on the activities authorised by the deemed marine licences in the manner suggested by Natural England.

The Applicant awaits Natural England's response at Deadline 5.

- **Ref: G17.** Natural England raised comments in relation to micro-siting to avoid impacts on benthic habitats of importance during the construction phase.

The Applicant has updated the wording in the dMLs at Deadline 5 to include the amended wording proposed by Natural England regarding reef habitats of principal importance as listed under Section 41 of the NERC Act.

The Applicant considers this matter now closed.

- **Ref: G19.** Natural England raise that there is currently no information on how the impacts of operations and maintenance works will be monitored.

The Applicant has re-iterated that all impacts assessed were concluded to be not significant in EIA terms, therefore no monitoring is proposed.

The Applicant awaits Natural England's response at Deadline 5.

1.2.9 Seascape Landscape and Visual Impact Assessment.

- 1.2.9.1 Tab H of the Natural England's Risk and Issues Log (REP4-043) contains no red or amber concerns for Seascape Landscape and Visual Impact Assessment.

Appendix A: Applicants updated version of the Natural England Risk and issues log