

Statement of Common Ground between Morgan Offshore Wind Limited and Fisheries Stakeholders





Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date	
F01	Deadline 2	RPS	Morgan Offshore Wind Ltd	Morgan Offshore Wind Ltd	October 2024	
F02	Deadline 6	RPS	Morgan Offshore Wind Ltd	Morgan Offshore Wind Ltd	February 2025	
Prepared b	y:	Prepare	d for:			
RPS			Morgan Offshore Wind Ltd.			



Signatories	
Signed	
Name	Brian Chambers
Date	24/02/2025
Position	Director
For	Anglo-North Irish Fish Producers Organisation
Signed	From: Elspeth Macdonald < Sent: 27 February 2025 12:57 To: Co: Subject: Fwd: Morgan Offshore Wind Project (Generation Assets) Commercial Fisheries SoCG
	Dear Rosie
	Please accept this email as SFF's agreement to the Statement of Common Ground.
	Our server is down at the moment, but please just let me know if you require an electronic signature, and I can provide that once our systems are fully restored.
	Kind regards
	Elspeth
	Elspeth Macdonald Chief Executive, Scottish Fishermen's Federation
Name	Elspeth Macdonald
Date	27 February 2025
Position	Chief Executive
For	Scottish Fishermen's Federation (representing Scottish Pelagic Fishermen's Association, Scottish White Fish Producers Association and West Coast Sea Products Ltd.)
Signed	
Name	Peter Gaches
Date	27 February 2025
Position	Morgan Generation Assets Consent Lead
For	Morgan Offshore Wind Limited



Contents

1.1	Introdu	uction	1
	1.1.1	Overview	
	1.1.2	Morgan Generation Assets elements under Fisheries stakeholders' remit	1
	1.1.3	Overview of Morgan Generation Assets	2
	1.1.4	Approach to SoCG	2
1.2	Summ	nary of SoCG	2
	1.2.1	Overview	2
	1.2.2	Summary of consultation	3
1.3	Agree	ment log	10
	1.3.1	Overview	10
	1.3.2	Commercial fisheries agreement logs	11
Tables			
Table 1.1:	Summ	nary of pre-application consultation with Fisheries stakeholders	3
Table 1.2:		nary of post-application consultation with Fisheries stakeholders	
Table 1.3:	Positio	on definitions and colour coding	10
Table 1.4:	•	ment log between the parties on the commercial fisheries environmental impact	
Table 1.5: /		ent log between the parties on the fisheries liaison and coexistence measures	

Glossary

Term	Meaning		
Applicant	Morgan Offshore Wind Limited.		
Deemed Marine Licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process.		
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).		
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets, and associated activities.		
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 Nationally Significant Infrastructure Projects.		

Acronyms

Acronym	Description			
ANIFPO	Anglo-North Irish Fish Producers Organisation			
CMS	Construction Method Statement			
CFLO	Company Fisheries Liaison Officer			
CSIP	Cable Specification Installation Plan			
DCO	Development Consent Order			
DP	Design Plan			
EIA	Environmental Impact Assessment			
FIR	Fishing Industry Representative			
FLCP	Fisheries Liaison Coexistence Plan			
IFPO	Irish Fish Producers Organisation			
ISEFPO	Irish South and East Fish Producers Organisation			
MFPO	Manx Fish Producers Organisation			
NFFO	National Federation of Fishermen's Organisations			
NIFF	Northern Ireland Fishermen's Federation			
NIFPO	Northern Ireland Fish Producers' Organisation			
OEMP	Offshore Environmental Management Plan			



Acronym	Description			
OFLCP	Outline Fisheries Liaison and Co-existence Plan			
OSP	Offshore Substation Platform			
PEIR	Preliminary Environmental Information Report			
SFF	Scottish Fishermen's Federation			
SMZ	Scallop Mitigation Zone			
SPFA	Scottish Pelagic Fishermen's Association			
SoCG	Statement of Common Ground			
SWFPA	Scottish White Fish Producers Association			
WCSP	West Coast Sea Products Ltd.			
WFA	Welsh Fishermen's Association			
WFC	Whitehaven Fishermen's Co-operative			
WFPO	Western Fish Producers Organisation			
UKHO	United Kingdom Hydrographic Office			



1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND FISHERIES STAKEHOLDERS

1.1 Introduction

1.1.1 Overview

- 1.1.1.1 This Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as 'the Applicant') and fisheries stakeholders, hereafter referred to together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the Development Consent Order (DCO) application for the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as 'Morgan Generation Assets').
- 1.1.1.2 The need for a SoCG between the Applicant and fisheries stakeholders is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 August 2024 (PD-001).
- 1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will facilitate further discussion between the parties and will be updated during the Morgan Generation Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-001).

1.1.2 Morgan Generation Assets elements under Fisheries stakeholders' remit

- 1.1.2.1 The fisheries stakeholders forming the interested parties in this SoCG at Deadline 6 includes the following organisations and fishing representatives where a relevant or written representation has been made and/or the organisations that the Applicant has engaged with regularly since the start of the pre-application phase:
 - Anglo-North Irish Fish Producers Organisation (ANIFPO)
 - Scottish Fishermen's Federation (SFF), who also represent the following stakeholders:
 - Scottish Pelagic Fishermen's Association (SPFA)
 - Scottish White Fish Producers Association (SWFPA)
 - West Coast Sea Products (WCSP) Ltd
- 1.1.2.2 There is a separate SoCG with the National Federation of Fishermen's Organisation (NFFO) who have an interest in the potential impacts of the Morgan Generation Assets on fishing activities, which was signed at Deadline 5 (REP5-053).
- 1.1.2.3 The elements of the Morgan Generation Assets which may affect the interests of fisheries stakeholders are detailed in Schedule 1 (Authorised Development), Part 1 (Authorised Development) of the Draft DCO (REP5-017).
- 1.1.2.4 This SoCG covers the following commercial fisheries topics of relevance to Fisheries stakeholders:
 - Assessment of baseline data
 - Assessment and proposed mitigation of effects on commercial fishing



- Outline Fisheries Liaison and Co-existence Plan.
- 1.1.2.5 Volume 2, Chapter 6 Commercial Fisheries (APP-024) and the Technical Appendix in Volume 4, Annex 6.1 (APP-059) provides the detail for the assessment of these topics and the Outline Fisheries Liaison and Coexistence Plan (REP5-027) sets out the commitments for commercial fisheries for the Morgan Generation Assets.

1.1.3 Overview of Morgan Generation Assets

- 1.1.3.1 The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The Morgan Generation Assets will include offshore infrastructure and consists of:
 - Morgan Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables and interconnector cables will be located.

1.1.4 Approach to SoCG

- 1.1.4.1 This SoCG has been developed during the pre-Examination phase and will be progressed during the Examination phase of the Morgan Generation Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by fisheries stakeholders within its response to Scoping, Section 42 consultation and as raised through the commercial fisheries consultation that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by fisheries stakeholders during the post-application phase (i.e. relevant representations and pre-Examination meetings).
- 1.1.4.2 The structure of this SoCG is as follows:
 - Section 1.1: Introduction
 - Section 1.2: Summary of SoCG
 - Section 1.2.2: Summary of consultation
 - Section 1.3: Agreement Log.

1.2 Summary of SoCG

1.2.1 Overview

- 1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phases of the Morgan Generation Assets. The agreement logs present the position reached on 27 February 2025 (Deadline 6).
- 1.2.1.2 During meetings with stakeholders in September 2024 the Applicant set out the approach to the SoCGs. It was agreed that there will be two separate SoCG's for fisheries stakeholders; one for NFFO, WFA and WFC and a second for all other fisheries stakeholders. SoCGs, were then shared with stakeholders via email.
- 1.2.1.3 Within the SoCGs shared with stakeholders, the Applicant had already captured stakeholder positions from relevant representations as well as updates from meetings held in July and September 2024, when commitments (see CF.OFLCP.P1 to CF.OFLCP.T17 in Table 1.5) set out within the Outline Fisheries Liaison and Co-Existence Plan (OFLCP) (APP-065) were discussed. Stakeholders then provided feedback via email confirming agreement with the Applicants position or matters that require further discussion.



- 1.2.1.4 The Outline Fisheries Liaison and Coexistence Plan has been updated four times during the Morgan Generation Assets examination to incorporate further stakeholder comments:
 - Deadline 2 (clean REP2-019 and tracked REP2-020)
 - Deadline 3 (clean REP3-021 and tracked REP3-022)
 - Deadline 4 (clean REP4-021 and tracked REP4-022)
 - Deadline 5 (clean REP5-027 and tracked REP5-028)

1.2.2 Summary of consultation

- 1.2.2.1 Table 1.1 below provides a summary of the consultation undertaken by the Applicant with Fisheries stakeholders, relevant to the assessment of effects on commercial fisheries during the pre-application phases of the Morgan Generation Assets.
- 1.2.2.2 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with Fisheries stakeholders during the post-application phases of the Morgan Generation Assets.

Table 1.1: Summary of pre-application consultation with Fisheries stakeholders.

Date	Form of consultation	Relevant Stakeholders	Statutory or non-statutory engagement	Summary of consultation
Commerc	ial fisheries co	onsultation		
24/06/2021	Meeting	Scottish White Fish Producers Association (SWFPA), and West Coast Sea Products Ltd (WCSP), Fishing Industry Representative (FIR), Scottish Fishermen's Federation (SFF)	Non-statutory	 Morgan Array Area location. Co-existence during the operations and maintenance phase.
29/06/2021	Meeting	Individual fishers from B&M Fishing LLP Fleetwood and Maryport, Irish South and East Fish Producers Organisation (ISEFPO), Manx Fish Producers Organisation (MFPO), NFFO, Welsh Fishermen's Association (WFA), Western Fish Producers Organisation (WFPO), and Whitehaven	Non-statutory	 Morgan Array Area location. Co-existence during the operations and maintenance phase Cumulative impacts with other activities and developments in the region Potential impacts on fish stocks.



Date	Form of consultation	Relevant Stakeholders	Statutory or non-statutory engagement	Summary of consultation
		Fishermen's Cooperative (WFC)		
01/07/2021	Meeting	MFPO	Non-statutory	 Introduction to the project Approach to fisheries stakeholder engagement Overview of planned EIA and consenting process
01/07/2021	Meeting	Anglo-North Irish Fish Producers Organisation (ANIFPO), Northern Ireland Fish Producers' Organisation (NIFPO)	Non-statutory	 Morgan Array Area location. Co-existence during the operations and maintenance phase
14/02/2022	Meeting	ANIFPO, Redercentrale (Belgian Fish Producers), WFPO	Non-statutory	 Project updates Inter-array cable layout and burial depths Cumulative impacts with other activities and developments in the region Potential impacts on fish stocks Vessel data to inform the environmental assessment.
14/02/2022	Meeting	SFF, SWFPA, WCSP	Non-statutory	Introduction to project engagement with fisheries, surveys, fisheries liaison, scoping report, data collection, fisheries assessments and distinguish between queen and king scallop fisheries.
15/02/2022	Meeting	Individual fishers (Whitehaven), NFFO, WFC,	Non-statutory	Introduction to project engagement with fisheries, surveys, fisheries liaison, scoping report, data collection, fisheries assessments and distinguish between queen and king scallop fisheries.
15/02/2022	Meeting	MFPO, NFFO, WFC,	Non-statutory	Introduction to project engagement with fisheries, surveys, fisheries liaison, scoping report, data collection, fisheries assessments and distinguish between queen and king scallop fisheries
23/11/2022	Meeting	Individual fishers from B&M Fishing LLP	Non-statutory	 Project update Morgan array indicative layout and co- existence during the operations and maintenance phase Cumulative impacts with other activities and developments in the region Potential impacts on fish stocks.
23/11/2022	Meeting	SWFPA, SFF, WCSP	Non-statutory	Project update



Date	Form of consultation	Relevant Stakeholders	Statutory or non-statutory engagement	Summary of consultation
				Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.
24/11/2022	Meeting	Individual fishers (IoM), MFPO	Non-statutory	Identify vessels affected by cable route surveys
				Project update
				 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.
25/11/2022	Meeting	Conwy	Non-statutory	Project update
		commercial fishermen		 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.
01/12/2022	Meeting	ANIFPO, NIFPO, WFA	Non-statutory	Project update
		WIA		 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.
01/12/2022	Meeting	Redercentrale	Non-statutory	Project update
		(Belgian Fish Producers)		 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.
02/12/2022	Meeting	Irish Fish Producers	Non-statutory	Identify vessels affected by cable route surveys
		Organisation (IFPO) and		Project update
		ÌSEFPO		 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative impacts with other activities and developments in the region
				Potential impacts on fish stocks.

Date	Form of consultation	Relevant Stakeholders	Statutory or non-statutory engagement	Summary of consultation
11/09/2023	Meeting	Belgium Producers Organisation	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
		(Rederscentrale), MFPO		Presentation on key issues raised during PEIR consultation
				Project commitments for long term Co- existence
				Outline Fisheries liaison and coexistence plan.
				Next steps for engagement post submission
19/09/2023	Meeting	WCSP	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
				Presentation on key issues raised during PEIR consultation
				Project commitments for long term Co- existence
				Outline Fisheries liaison and coexistence plan
				Next steps for engagement post submission
19/09/2023	Meeting	Individual fisher (Annan), SWFPA	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
				Presentation on key issues raised during PEIR consultation
				Project commitments for long term Co- existence
				Outline Fisheries liaison and coexistence plan
				Next steps for engagement post submission
20/09/2023	Meeting	FIR, individual fishers (Blackpool),	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
		NFFO		Presentation on key issues raised during PEIR consultation
				Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative effects assessment
20/09/2023	Meeting	FIR, individual fishers (Whitehaven),	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
		NFFO, Whitehaven Fishermen's Cooperative		Presentation on key issues raised during PEIR consultation
				Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative effects assessment

Date	Form of consultation	Relevant Stakeholders	Statutory or non-statutory engagement	Summary of consultation
21/09/2023	Meeting	Individual fishers (Conwy)	Non-statutory	Project update and presentation of changes made to the project since PEIR, including scallop mitigation zone
				Provided an overview of the key feedback that had been received on the Preliminary Environmental Information Report (PEIR)
				 Morgan array indicative layout and co- existence during the operations and maintenance phase
				Cumulative effects assessment
03/10/2023	Meeting	FIR, ISEFPO	Non-statutory	Provided an overview of the project progress to date, the current status of project and expected application dates
				Key feedback on coexistence through the PEIR
				Cumulative effects assessment
				 Project changes and commitments – Morgan Gen
				Extent of area important for scallop stocks
04/10/2023	Meeting	ANIFPO, FIR, individual fishers (Kilkeel)	Non-statutory	Provided an overview of the project progress to date, the current status of project and expected application dates
				Key feedback on coexistence through the PEIR
				Cumulative effects assessment
				Project changes and commitments – Morgan Gen
04/10/2023	Meeting	FIR, NIFPO	Non-statutory	Provided an overview of the project progress to date, the current status of project and expected application dates
				Key feedback on coexistence through the PEIR
				Cumulative effects assessment
				Project changes and commitments – Morgan Gen

Table 1.2: Summary of post-application consultation with Fisheries stakeholders.

Date	Form of consultation	Relevant stakeholder	Statutory or non-statutory engagement	Summary of consultation
13/05/2024	Meeting	NFFO, Individual Operators	Non-statutory	Project status update provided, OFLCP and commitments discussed.

Date	Form of consultation	Relevant stakeholder	Statutory or non-statutory engagement	Summary of consultation
14/05/2024	Meeting	SFF, WCSP, Individual	Non-statutory	Project status update provided, OFLCP and commitments discussed.
		Operators		Discussions had regarding the potential establishment of a Commercial Fisheries Working Group.
16/05/2024	Meeting	IoM Gov, MFPO,	Non-statutory	Project status update provided, OFLCP and commitments discussed.
		Individual Operators		Clarification sought on commitments made relating to cable burial depth and rock protection. Query raised regarding whether commitments are secured if there is a change in IoM Government. Discussions had relating to Territorial Sea Committee (Department of Infrastructure (Dol)) comments. Further discussions agreed and additional/supporting information from IoM Gov to be requested. Discussions had regarding the potential establishment of a Commercial Fisheries Working Group.
17/05/2024	Meeting	ANIFPO, Northern Ireland	Non-statutory	Project status update provided, OFLCP and commitments discussed.
		Fishermen's Federation (NIFF), ISEFPO		Queries raised regarding whether pre- and post- construction scallop surveys were going to be undertaken, to monitor any impacts on scallop fishery. Clarification sought on timings of construction phase. Queried whether there is a procedure if cables are snagged by fishing vessels.
04/06//2024	Relevant representation	West Coast Sea Products Ltd	Statutory	Relevant representations of West Coast Sea Products Ltd.
10/06/2024	Relevant representation	NIFPO	Statutory	Relevant representations of NIFPO.
10/06/2024	Relevant representation	SFF	Statutory	Relevant representations of SFF.
11/06/2024	Relevant representation	SPFA	Statutory	Relevant representations of SPFA.
11/06/2024	Relevant representation	SWPA	Statutory	Relevant representations of SWPA.
21/06/2024	Relevant representation	NFFO	Statutory	Relevant representations of NFFO.
10/07/2024	Relevant representation	Northern Ireland Fishermen's Federation	Statutory	Relevant representations of Northern Ireland Fishermen's Federation.
18/06/2024	Meeting	Traditional & Sustainable Commercial Fishing Association	Non-statutory	Project status update provided, OFLCP and commitments discussed.



Date	Form of consultation	Relevant stakeholder	Statutory or non-statutory engagement	Summary of consultation
29/07/2024	Meeting	SFF, SPFA, SWFPA, WCSP	Non-statutory	Project status update provided, OFLCP and commitments discussed.
30/07/2024	Meeting	MFPO, Sea Fisheries Manager, IoM GOV	Non-statutory	Project status update provided, OFLCP and commitments discussed.
30/07/2024	Meeting	ANIFPO, B&M Fishing LLP, ISEFPO, NIFF, NIFPO	Non-statutory	Project status update provided, OFLCP and commitments discussed.
31/07/2024	Meeting	WFA	Non-statutory	Project status update provided, OFLCP and commitments discussed.
23/09/2024	Meeting	NFFO, WFA	Non-statutory	Project status update, OFLCP, initial discussion on SoCG.
23/09/2024	Meeting	ISEFPO, SFF, WCSP Ltd.	Non-statutory	Project status update, OFLCP, initial discussion on SoCG.
24/09/2024	Meeting	MFPO, IoM GOV	Non-statutory	Project status update, OFLCP, initial discussion on SoCG.
24/09/2024	Meeting	ANIFPO, NIFPO, NIFF, B&M Fishing LLP	Non-statutory	Project status update, OFLCP, initial discussion on SoCG.
07/02/2025	Meeting	NIFPO, NIFF, SFF, SPFA, SWFPA and WCSP	Non-statutory	Finalisation of the SoCG agreement logs.



1.3 Agreement log

1.3.1 Overview

1.3.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.3 below.

Table 1.3: Position definitions and colour coding.

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material.
Not agreed	The matter is not considered to be agreed between the parties.

- 1.3.1.2 The following section sets out the level of agreement between the parties for each relevant component of the application.
- 1.3.1.3 Table 1.4 sets out the level of agreement between the parties for matters relating to the Environmental Impact Assessment completed by the Applicant.
- 1.3.1.4 Table 1.5 sets out the level of agreement between the parties for matters relating to the most recent version of the OFLCP (REP5-027).



1.3.2 Commercial fisheries agreement logs

Table 1.4: Agreement log between the parties on the commercial fisheries environmental impact assessment

Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
Environmenta	al Impact Assessment			
CF.EIA.1	Consultation	The level and quality of communication between the Applicant and fisheries stakeholders to date has been appropriate.	Status 'Agreed' via email on 08/10/2024 for SFF, NIFF and ANIFPO.	Agreed
CF.EIA.2	Consultation	The Applicant will maintain on-going communication and liaison with fisheries stakeholders during the pre-construction, construction, operational and decommissioning phases of the Project.	Status 'Agreed' via email on 08/10/2024 for SFF, NIFF and ANIFPO.	Agreed
CF.EIA.3	Baseline environment	The commercial fisheries baseline and environmental statement (APP-024) are a fair and reasonable representation of the fishing activities in the area. The fish surveys referred to by NIFF are not part of the EIA baseline characterisation surveys and are not being undertaken to inform the ES. The Applicant considers its existing characterisation of fish receptors to be robust for EIA purposes. These surveys are being undertaken with a view to help inform potential future discussions relating to the underwater noise mitigation options in the underwater sound management strategy. The Applicant confirmed that the assessment for fish and shellfish ecology presented in Volume 2, Chapter 3: Fish and shellfish ecology (APP-021) is highly precautionary. Whilst the assessment does not directly reference the latest International Council for Exploration of the Sea (ICES) advice regarding herring stocks, the precautionary nature of the assessment of	NIFF: No comment NIFF: There is no reference to fish surveys in Table 6.6 - Summary of site-specific survey data. Clarification sought on where the outcomes of the fish surveys that have been commissioned by the developer can be reviewed and what the methodology of the fish surveys are. Volume 2, Annex 6.1: Commercial fisheries technical report of the Environmental Statement, paragraph 1.4.2.23 - ICES advice for Herring has significantly changed since 2022. This has a baring on the significance of external pressures on this stock from the development of the Morgan site. ANIFPO: Endorse NIFF point.	Final position 07/02/2025: Agreed and the Applicant will investigate if and when fish survey data can be shared with fisheries stakeholders.



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
		herring means that the Applicant does not foresee any changes required in the way the assessment has been undertaken with regards to herring spawning and nursery sensitivities. The Applicant has provided a full response to this comment raised by SFF during Issue Specific Hearing 1 in S_D1_4.9_Morgan Gen_Response to Hearing Action Point 22_ICES guidance and SFF_F01 (REP1-014) and further in response to SFF's Written Representation in REP2-005).		
CF.EIA.4	Assessment methodology	The general methodologies presented in Volume 2, Chapter 6: Commercial fisheries (APP-024) and used in the assessment are suitable and appropriate.	SFF: No/don't agree. They are based on expert judgement which does not represent the real impacts of the development on commercial fisheries. WCSP: We have undertaken specific analysis of this proposal in relation to how it will impact us and it is our view that multiple fishery related impacts have been underscored by the EIA fisheries chapter both project specific and cumulatively. ANIFPO: No/don't agree	Not agreed
CF.EIA.5	Assessment conclusions – project alone	The results of the project alone assessment, as presented in Volume 2, Chapter 6: Commercial fisheries (APP-024) are appropriate. With regards to the AFBI research vessel, the Applicant has incorporated previous herring larvae data from AFBI surveys into the Fish and shellfish ecology technical report. For these recent/current surveys, it is expected that the data for the previous year will be available from springtime 2025. The Applicant notes that this is an Irish Sea wide survey programme and there are sufficient sampling collection sites for full coverage.	SFF: No/don't agree. They are based on expert judgement which does not represent the real impacts of the development on commercial fisheries. WCSP: We have undertaken specific analysis of this proposal in relation to how it will impact us and it is our view that multiple fishery related impacts have been underscored by the EIA fisheries chapter both project specific and cumulatively. NIFF: Ongoing point of discussion. It's unclear what the assessment of the impact on the SMZ is if cables are buried within it.	Not agreed



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
			We can't find any reference in Volume 2 Chapter 6 to the potential indirect impacts on commercial fisheries resulting from loss of stock assessment sampling sites. During 2024 we have logged AFBIs research vessel, the Corystes undertaking juvenile cod surveys and herring surveys within or close to the Morgan development area. ANIFPO: Agree with response from NIFF	
CF.EIA.6	Assessment conclusions – cumulatively	The results of the project plus cumulative projects and plans, as presented in Volume 2, Chapter 6: Commercial fisheries (APP-024) are appropriate.	SFF: No/don't agree. They are based on expert judgement which does not represent the real impacts of the development on commercial fisheries. WCSP: We have undertaken specific analysis of this proposal in relation to how it will impact us and it is our view that multiple fishery related impacts have been underscored by the EIA fisheries chapter both project specific and cumulatively. ANIFPO: no/don't agree	Not agreed
CF.EIA.7	Mitigation	The mitigation measures and conditions outlined in the EIA, Commitments Register and OFLCP (outlined further below) are appropriate and will ensure significant effects are avoided.	Residual concerns on the presence of cables within the SMZ and turbines along the SMZ boundary. (See CF.OFLCP.P6)	Not agreed. Final position 07/02/25: This is not agreed because there is the potential for WTGs on the perimeter and cables to be placed within the SMZ.



Table 1.5: Agreement log between the parties on the fisheries liaison and coexistence measures

Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
Liaison and Coexist	ence Measures			
CF.OFLCP.P1	Construction Method Statement (CMS) and Cable Specification and Installation Plan (CSIP)	Development of and adherence to a Construction Method Statement (CMS) which includes a Cable Specification and Installation Plan (CSIP), the CSIP will incorporate the Cable Burial Risk Assessment (CBRA) where cable protection shall be designed to minimise snagging hazards as far as possible. for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement, type of rock (e.g. smoother edges).	This commitment was discussed with the Applicant during meetings in July and September 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
		The Applicant has included the following text to the end of this commitment 'and target cable burial depth will be determined to minimise the risk of snagging hazards and cable exposure as far as possible.'		
		Whilst the MDS indicates a minimum cable burial depth of 0.5 m, a greater burial depth will be determined where appropriate to minimise the risk of anchors and, or fishing gear snagging and cable exposure, based on local seabed conditions.		
CF.OFLCP.P2	Cable protection	The Applicant has included a new measure reflecting commitments on the percentage of cables that will be protected within the array area to ensure safety of fishing activity and to minimise the amount of fishing grounds lost. The following wording has been added to the next update of the OFLCP:	This commitment was mentioned to stakeholders during meetings in September 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
		Development and adherence to an offshore CMS which includes a CSIP that minimises the use of cable protection as far as reasonably practicable.		
		The justification details the maximum volume and footprint of cable protection according to the		



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
		Project Description chapter of the Environmental Statement (APP-010).		
CF.OFLCP.P3	Minimising cable installation programme	Development of and adherence to an offshore CMS which includes a CSIP where the time delay between sequential cable installation operations (e.g. cable-lay and post-lay burial), shall be minimised to as short as reasonably practicable.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.P4	Minimum spacing of infrastructure	Infrastructure spacing at a minimum of 1,400 m apart. The Applicant has updated this wording to align with the layout principles, as set out in Table 3.7 of the Project Description chapter (APP-010).	This commitment was discussed with the Applicant during meetings in July 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
CF.OFLCP.P5	North-south alignment of rows	Development of and adherence to a Design Plan (DP) with roughly north to south alignment of wind turbine rows The Applicant has updated this wording to align with the layout principles as set out in Table 3.7 of the Project Description chapter (APP-010).	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.P6	Scallop Mitigation Zone	Development of and adherence to a Design Plan which includes implementation of a Scallop Mitigation Zone (SMZ) over an area of core scallop grounds within the Morgan Array Area. The SMZ will either be 34km² or 37km² depending on whether peripheral turbines are required as part of the final scheme design.	This commitment was discussed with the Applicant during meetings in July 2024. Concern was raised about the presence of cables in the SMZ and consideration for longer term monitoring. The presence of perimeter WTGs in combination with new potential cable burials will present a challenge to fish – especially in weather.	Not agreed. Final position 07/02/25: This is not agreed because there is the potential for WTGs on the perimeter and cables to be placed within the SMZ.
CF.OFLCP.T1	Fisheries Liaison Officer	Development of and adherence to an Offshore Environmental Management Plan (OEMP), which includes a FLCP, to include details of the appointment and responsibilities of a Company Fisheries Liaison Officer (CFLO).	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
CF.OFLCP.T2	Fisheries Liaison	Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for ongoing liaison with the fishing industry through the CFLO and FIR and adhere to good practice guidance with regards to fisheries liaison. The Applicant has updated the justification to say "A suitable candidate for the FIR will be identified to the CFLO by fisheries stakeholders."	This commitment was discussed with the Applicant during meetings in July 2024 and September 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
CF.OFLCP.T3	Commercial Fisheries Working Group	Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for investigating the establishment of a commercial fisheries working group.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.T4	Notice to Mariners	Notification to fishing fleets of construction and maintenance activities.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.T5	Offshore Fisheries Liaison Officers	Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for the use of Offshore Fisheries Liaison Officers (OFLOs) where required and appropriate. The Applicant has updated the wording to reflect that Local OFLOs will be used where possible.	This commitment was discussed with the Applicant during meetings in July 2024 and September 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
CF.OFLCP.T6	Timely distribution of NtMs	Timely and efficient distribution NtMs.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.T7	Safety zones and advisory clearance distances	Use of advisory clearance distances and safety zones during construction and periods of major maintenance.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed
CF.OFLCP.T8	Rolling advisory exclusion zones	Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for the use of rolling advisory exclusion zones.	This commitment was discussed and agreed with the Applicant during meetings in July 2024.	Agreed



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
CF.OFLCP.T9	Aids to Navigation Management Plan	Development of and adherence to an Aids to Navigation Management Plan (ANMP) to ensure adequate navigational markers (including lighting), in accordance with the most recent relevant industry guidance and agreed prior to commencement of offshore construction.	This commitment was discussed and agreed with the Applicant during meetings in July 2024. (SFF agreed via email on 08/10/2024).	Agreed
CF.OFLCP.T10	Cable protection management	Development of and adherence to a CMS, including CSIP that details cable protection management and scour protection management, to outline cable burial depth, cable protection and monitoring of inter array and interconnector cables to reduce snagging risk. The Applicant has updated this wording to include consideration of seabed level change.	This commitment was discussed and agreed with the Applicant during meetings in July 2024. (SFF agreed via email on 08/10/2024).	Agreed
CF.OFLCP.T11	Annual review for first 5 years of VMS data and landings data	Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for annual reviews for the first five years of the operations and maintenance phase, to review Vessel Monitoring System (VMS) data and landings data to identify whether there are any changes to fishing activity within and around the Morgan Array Area and where there is change to discuss with commercial fisheries stakeholders. The Applicant has updated the wording to include iVMS as an additional data source, where available.	This commitment was discussed and agreed with the Applicant during meetings in July and September 2024. Based on the additional text included in the next update of the OFLCP the parties agree.	Agreed
CF.OFLCP.T12	Coordinates of cables	'As-laid' co-ordinates of cables within the Morgan Array Area (i.e. inter array cables)) shall be recorded and submitted to the UK Hydrographic Office (UKHO) and the Kingfisher Information Service – Offshore Renewable and Cable Awareness (KISORCA Service). 'As-laid' cables shall be marked on Admiralty Charts and fisherman's awareness charts (paper and electronic format).	This commitment was discussed with the Applicant during meetings in July 2024. Request made to be provided with coordinates to also cover sections of cables that have additional protection around them, i.e. rock. Final position 07/02/25: It was discussed that this could be agreed	Agreed



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
		The Applicant has updated the wording in the justification to include coordinates of as laid cables shall be provided post-construction to the UKHO and the KISORCA Service. If these services are able to report additional cable protection locations this information could be provided.	based on the request to be informed of new cables promptly.	
		The Applicant will issue a weekly notice of operations which depict where cables have been laid and when they have been buried.		
CF.OFLCP. T13	Dropped objects	Compliance with dropped objects procedures. All dropped objects must be reported to the MMO using the Dropped Object Procedure Form.	This commitment was discussed and agreed with the Applicant during meetings in July 2024. (SFF agreed via email on 08/10/2024).	Agreed
CF.OFLCP.T14	Decommissioning programme	Development of and adherence to a Decommissioning Programme.	This commitment was discussed and agreed with the Applicant during meetings in July 2024. (SFF agreed via email on 08/10/2024).	Agreed
CF.OFLCP.T15	Offshore Environment Management Plan	Development and adherence to an OEMP, which includes a Marine Pollution Contingency Plan (MPCP).	This commitment was discussed and agreed with the Applicant during meetings in July 2024. (SFF agreed via email on 08/10/2024).	Agreed
CF.OFLCP.T16	Guard vessels	Development of and adherence to a FLCP, in accordance with the Outline FLCP which includes for the use of guard vessels where required.	This commitment was discussed and agreed with the Applicant during meetings in July 2024. SFF agreed via email on 08/10/2024.	Agreed
		Regional OFLOs and guard vessels shall be utilised where appropriate, during the construction, operation and maintenance and decommissioning phases	ANIFPO, encourage the need to use local boats when possible as guard vessels to enhance the benefits to the local coastal communities who will be most affected.	
CF.OFLCP.T17	Ongoing fisheries monitoring	The Applicant has updated the OFLCP to include:	SFF propose ongoing fisheries monitoring to be undertaken every 5 years to determine the impacts of the	Agreed



Reference Number	Discussion point	Applicant's Position	Fisheries stakeholder's Position	Status
		Development and implementation of a monitoring programme which includes pre- and post-construction monitoring of Queen scallop (and King) in and around the Morgan Array Area for up to five years post construction with annual reporting. If it is evident following a period of adaptive monitoring that the effect on Queen scallop is significantly worse than predicted in the ES, the Applicant will engage with the MMO and relevant	development on commercial fisheries (pre-development, during construction, post-construction and operation). Final position 07/02/25: Noting 'adaptive' nature of the monitoring it was discussed with SFF, WCSP, SPFA, and ANIFPO that this was agreed.	
		stakeholders on an appropriate adaptive management intervention measure.		
		The approach to monitoring will be fully developed post-consent and secured in the final offshore monitoring plan.		
		Development of the monitoring programme post- consent will consider methodologies from other regional monitoring programmes and input from key fisheries stakeholders.		
		The Applicant will report on the results annually and should the results of the monitoring show effect, engage with key stakeholders on next steps.		