

# MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

**Marine Management Organisation Statement of Common Ground**



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# Contents

<b>1</b>	<b>INITIAL STATEMENT OF COMMON GROUND BETWEEN MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS AND MARINE MANAGEMENT ORGANISATION.....</b>	<b>1</b>
1.1	Introduction.....	1
1.1.1	Overview .....	1
1.1.2	Transmission Assets elements under MMO's remit .....	1
1.1.3	Overview of Transmission Assets.....	2
1.1.4	Approach to SoCG.....	3
1.2	Summary of SoCG .....	3
1.2.1	Overview .....	3
1.2.2	Summary of those matters agreed, ongoing points of discussion and not agreed .....	4
1.3	Summary of Consultation.....	4
1.4	Agreement log .....	8
1.4.2	Physical Processes.....	9
1.4.3	Benthic Subtidal and Intertidal Ecology .....	14
1.4.4	Fish and Shellfish Ecology.....	18
1.4.5	DCO and deemed Marine Licences .....	23
1.4.6	Other Documents and Plans.....	25

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## Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Development Consent Order (DCO)	An order made under the Planning Act 2008, as amended, granting development consent.
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 to apply for 'deemed marine licences' in English waters as part of the development consent process.
Morecambe Offshore Windfarm: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure required to connect the Morecambe Offshore Windfarm to the National Grid.
Morecambe OWL	Morecambe Offshore Windfarm Ltd (Morecambe OWL), owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V), is developing the Morecambe Offshore Windfarm, also located in the east Irish Sea.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The offshore export cables, landfall, and onshore infrastructure for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore export cables, landfall site, onshore export cables, onshore substations, 400 kV grid connection cables and associated grid connection infrastructure such as circuit breaker compounds.  Also referred to in this report as the Transmission Assets, for ease of reading.
Morgan Offshore Wind Project: Generation Asset	The offshore generation assets and associated activities for the Morgan Offshore Wind Project.
Morgan Offshore Wind Project: Transmission Assets	The offshore export cables, landfall and onshore infrastructure required to connect the Morgan Offshore Wind Project to the National Grid.
Morgan OWL	Morgan Offshore Wind Limited (Morgan OWL), a joint venture between JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW), is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project is a proposed wind farm in the east Irish Sea.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

## Acronyms

Acronym	Meaning
AHEF	Archaeology and Heritage Engagement Forum
CEA	Cumulative Effects Assessment
CSIP	Outline Offshore Cable Specification and Installation Plan
DCO	Development Consent Order
ECRA	The Crown Estate Export Cable Route Assessment
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
EWG	Expert Working Group
ExA	Examining Authority
kV	Kilovolt
LSE	Likely Significant Effect
MCZ	MCZ Marine Conservation Zone
MMO	Marine Management Organisation
OWL	Offshore Wind Limited
PEIR	Preliminary Environmental Information Report
PTS	Permanent Threshold Shift
SoCG	Statement of Common Ground
UXO	Unexploded Ordnance

# 1 Initial Statement of Common Ground between Morgan and Morecambe Offshore Wind Farms: Transmission Assets and Marine Management Organisation

## 1.1 Introduction

### 1.1.1 Overview

1.1.1.1 This initial Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Ltd (hereafter referred to as 'the Applicants') and Marine Management Organisation (MMO), together the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (hereafter referred to as 'the Transmission Assets').

1.1.1.2 The need for a SoCG between the Applicants and MMO is set out within Appendix F of the Rule 6 letter issued by the Planning Inspectorate on 28 March 2025 (PD-006).

- This document is intended to provide the Examining Authority (ExA) with an overview of the level of common ground between the parties. The SoCG will identify where agreement has been reached, where differences lie and the reasons for disagreement or outstanding matters. The SoCG will also specify the actions needed to address the issues and will facilitate further discussion between the parties. The SoCG will be updated during the Transmission Assets Examination and submitted at the Deadlines as set out in the Rule 6 letter (PD-006).

### 1.1.2 Transmission Assets elements under MMO's remit

1.1.2.1 MMO's remit, as set out in the relevant representation (RR-1414) is to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas. The elements of the Transmission Assets which may affect the interests of MMO are within Work Number 1A, 1B, 2A, 2B, 3A3B, 4A4B and Work Numbers 26A to 31A, covering the offshore, intertidal and River Ribble crossing works. These are detailed in Schedule 2A (Authorised Project), Part 1 (Authorised Development) and in Schedule 2B (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (AS-004).

This SoCG covers the following topics of relevance to MMO:

- Coastal processes
- Benthic subtidal and intertidal ecology
- Fish and shellfish ecology
- Underwater noise (which is addressed in the relevant EIA topics above)



- Other Documents and Plans
  - Outline Marine Mammal Mitigation Protocol (MMMP)
  - Offshore In Principle Monitoring Plan
  - Outline Offshore Operations and Maintenance Plan
  - Outline Fisheries Liaison and Co-existence Plan
  - Outline Offshore Cable Specification and Installation Plan
  - Outline Cable Burial Risk Assessment

1.1.2.2 For the following offshore matters MMO defers to statutory consultees and relevant interested parties:

- Marine mammals (defer to Natural England)
- Offshore ornithology (defer to Natural England)
- Marine archaeology and cultural heritage (defer to Historic England)
- Shipping and navigation (defer to the Maritime and Coastguard Agency and Trinity House)
- Commercial fisheries (defer to the commercial fishing industry interested parties)
- Seascape, landscape and visual resources (defer to Natural England)

1.1.2.3 The MMO will continue to be part of the discussions relating to securing any mitigation and monitoring or other conditions required within the DMLs, which will be set out in the agreement table for DCO and Marine Licenses below.

### 1.1.3 Overview of Transmission Assets

1.1.3.1 The design philosophy for the Transmission Assets is for the Morgan Offshore Wind Project: Generation Assets and the Morecambe Offshore Windfarm: Generation Assets (referred to as ‘the Generation Assets’) to be electrically independent. Therefore, each offshore wind farm will have its own separate set of transmission assets (e.g., cable and substation infrastructure). However, the location of the infrastructure will be aligned (where practicable), for example within aligned offshore and onshore cable corridors to minimise impacts to environment and the community.

1.1.3.2 Morgan OWL and Morecambe OWL (the Applicants), are jointly seeking a single consent for their electrically separate transmission assets comprising aligned offshore export cable corridors to landfall and aligned onshore export cable corridors to separate onshore substations (and associated infrastructure), and onward connection to the National Grid at Penwortham, Lancashire.

1.1.3.3 The key components of the Transmission Assets include the following.

- Offshore elements:
  - offshore export cables: these export cables will bring the electricity generated by the Generation Assets to the landfall for onward transmission.



- Landfall:
  - landfall site: this is where the offshore export cables are jointed to the onshore export cables via the transition joint bays. This term applies to the entire area between Mean Low Water Springs and the transition joint bays.
- Onshore elements:
  - onshore export cables: these export cables will be jointed to the offshore export cables via the transition joint bays at the landfall site, and will bring the electricity generated by the Generation Assets to the onshore substations;
  - onshore substations: the two electrically separate onshore substations will contain the components for transforming the power supplied via the onshore export cables up to 400 kV;
  - 400 kV grid connection cables: these export cables will bring the electricity generated by the Generation Assets from the two electrically separate onshore substations to the existing National Grid substation at Penwortham;
  - environmental mitigation areas: temporary and/or permanent areas, including accesses identified to provide environmental mitigation only; and
  - biodiversity benefit areas: temporary and/or permanent areas, including accesses identified to provide biodiversity benefit only.

## 1.1.4 Approach to SoCG

1.1.4.1 This initial SoCG has been developed during the pre-examination phase and will be progressed during the examination phases of the Transmission Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by MMO within its response to the Scoping Report, Section 42 consultation and as raised through the Evidence Plan Process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by MMO 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 1.3: Summary of consultation
- Section 1.4: 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 phase of the Transmission

Assets. The agreement logs present the position reached on 8 August 2025 (Deadline 4).

## 1.2.2 Summary of those matters agreed, ongoing points of discussion and not agreed

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

**Table 1.1: Summary of those matters agreed, ongoing points of discussion and not agreed**

Topic	Agreement status
Physical Processes	Ongoing point of discussion
Benthic Subtidal and Intertidal Ecology	Ongoing point of discussion
Fish and Shellfish Ecology	Ongoing point of discussion
DCO and Marine Licences	Ongoing point of discussion
Other Documents and Plans	Ongoing point of discussion

## 1.3 Summary of Consultation

1.3.1.1 Table 1.2 below provides an overview of the consultation undertaken by the Applicants with MMO during the pre-application phases of the Transmission Assets.

1.3.1.2 Table 1.3 below provides a summary of the consultation undertaken by the Applicants with the MMO during the *post*-application phases of the Transmission Assets. The consultation presented is not exhaustive but provides an indication of aspects of key discussions undertaken. All attendees at the meetings listed in Table 1.2 are provided in the Technical Engagement Plan (APP-189) and Consultation Report (APP-170), however for the avoidance of doubt, this SoCG is limited to matters between the MMO and the Applicants.

1.3.1.3 This initial SoCG makes reference to other documents submitted with the Transmission Assets applications that set out, in greater detail, the discussions that have taken place between the MMO and the Applicants. These documents are:

- The Technical Engagement Plan (APP-189) and appendices (APP-190, APP-191 and APP-192)
- The Consultation Report (APP-170) and annexes (APP-187 and APP-188)
- The Marine Management Organisation's Relevant Representation (RR-1414)
- The Applicants' response to the Marine Management Organisation's Relevant Representation at the Procedural Deadline (PDA-013).

**Table 1.2: Summary of pre-application consultation with MMO**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Scoping</b>			
08 December 2022	Scoping Opinion	Statutory	<ul style="list-style-type: none"> <li>Issue of Scoping Opinion</li> </ul>
<b>Statutory (Section 42) consultation</b>			
12 October 2023	Statutory consultation	Statutory	<ul style="list-style-type: none"> <li>Statutory consultation responses from the MMO are presented in Consultation Report Appendices E1.9 (APP-180).</li> </ul>
<b>Transmission Assets Evidence Plan Steering Group</b>			
10 January 2023	Meeting 1	Non-statutory	<ul style="list-style-type: none"> <li>Introduction to the Transmission Assets and the projects programme and key milestones.</li> <li>Discussions of the Pre-Application and Evidence Plan Processes and overview of the Evidence Plan Steering groups and Expert Working groups.</li> </ul>
11 May 2023	Meeting 2	Non-statutory	<ul style="list-style-type: none"> <li>Discussion of the timeline of activities and offshore site selection process including the key restraints, offshore cable route selection and landfall providing the final offshore cable corridor prior to PEIR.</li> <li>Interaction with the key designated sites were presented alongside mitigation options and The Crown Estate Export Cable Route Assessment (ECRA).</li> </ul>
16 July 2024	Meeting 3	Non-statutory	<ul style="list-style-type: none"> <li>Project updated and route planning and site selection refinements made to the project post PEIR. Survey updates were presented alongside the commitments register and Evidence Plan Process.</li> </ul>
<b>Transmission Assets Physical Processes, Benthic Ecology and Fish and Shellfish Ecology</b>			
30 March 2023	EWG01	Non-statutory	<ul style="list-style-type: none"> <li>The project overview was presented alongside and overview of the Evidence Plan Process, including the Steering Group and EWGs.</li> <li>Information on the baselines and approach to assessment were provided for each of the topic's updates on the approach to the Fylde MCZ.</li> </ul>
27 July 2023	EWG02	Non-statutory	<ul style="list-style-type: none"> <li>Project updates were presented prior to the updates to the approach to the Cumulative Effects Assessment (CEA).</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>Each topic presented their baseline and initial assessment approach alongside their approach to the CEA outputs.</li> <li>The MCZ Assessments baseline and initial assessment outputs were also presented.</li> </ul>
07 February 2024	EWG03	Non-statutory	<ul style="list-style-type: none"> <li>A project update and the refinements to the project parameters post-PEIR were presented.</li> <li>The section 42 responses for each topic were discussed including those of the MCZ assessment.</li> </ul>
15 August 2024	EWG04	Non-statutory	<ul style="list-style-type: none"> <li>Presentation and discussion of the updates post Section 42 regarding the commitments and impact assessments of the MCZ Assessment.</li> <li>Updates to and discussion of the Outline Offshore Cable Specification and Installation Plan (CSIP and the Outline Cable Burial Risk Assessment (CBRA) were presented.</li> </ul>
<b>Transmission Assets Marine Mammals</b>			
05 April 2023	EWG01	Non-statutory	<ul style="list-style-type: none"> <li>Introduction to the Transmission Assets including the programme and key milestones.</li> <li>The purpose of the Evidence Plan Process, including the EWG approach to agreement, indicative meeting programme and ways of working were discussed.</li> <li>The approach to baseline and initial findings for marine mammals was presented alongside the methodology and assessment approach for underwater sound.</li> </ul>
01 August 2023	EWG02	Non-statutory	<ul style="list-style-type: none"> <li>Project updates were presented followed by addressing feedback and actions from the first EWG for offshore ornithology.</li> <li>The initial assessment outputs for the marine mammal assessment were discussed, including PTS ranges, behavioural effects noise contours, mitigation considerations, UXO clearance and cumulative effects.</li> </ul>
08 February 2024	EWG03	Non-statutory	Project update and refinements to the project parameters post PEIR. The section 42 responses for marine mammals were presented and discussed followed by LSE Screening.
<b>Transmission Assets Offshore Ornithology</b>			
01 June 2023	EWG01	Non-statutory	<ul style="list-style-type: none"> <li>Introduction to the Transmission Assets project and key milestones.</li> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <li>The purpose and overview of the Evidence Plan Process, including the approach to agreement, indicative way of working and meeting programmes were presented. Subsequently, the initial baseline and approach to assessment for the offshore ornithology topic was presented.</li> </ul>
02 August 2023	EWG02	Non-statutory	<ul style="list-style-type: none"> <li>A project update and the offshore ornithology updates regarding initial assessment outputs and the approach to the CEA.</li> </ul>
06 February 2024	EWG03	Non-statutory	<ul style="list-style-type: none"> <li>A project update was presented followed by the project parameter refinements post-PEIR and then the S42 responses relevant to the offshore ornithology topic.</li> </ul>
<b>Morgan and Morecambe OWF: Transmission Assets – Archaeology and Heritage Engagement Forum (AHEF)</b>			
05 June 2023	Meeting 1	Non-statutory	<ul style="list-style-type: none"> <li>Introduction and project overview of the Transmission Assets was provided.</li> <li>Project milestones and roadmap was presented prior to the presentation of the baseline and data analysis to be contained within the PEIR.</li> <li>The approach to assessment for Marine Archaeology was presented.</li> </ul>
29 February 2024	Meeting 2	Non-statutory	<ul style="list-style-type: none"> <li>A project update and initial post-PEIR project refinements were presented followed by the S42 responses relevant to Marine Archaeology.</li> </ul>
20 August 2024	Meeting 3	Non-statutory	<ul style="list-style-type: none"> <li>Presentation of project updates and further refinements post-PEIR, a recap of the geophysical and geotechnical surveys undertaken, and an overview of the archaeological impacts assessed within the ES.</li> </ul>

**Table 1.3: Summary of post-application consultation with MMO**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
4 November 2024	Monthly MMO Meeting	Non-statutory	Post Acceptance Engagement. Matters discussed include project update and DCO Examination timeline, forward process.

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
2 December 2024	Monthly MMO Meeting	Non-statutory	Update meeting – Matters discussed include project update and DCO Examination timeline, forward process.
27 January 2025	Monthly MMO Meeting	Non-statutory	Update meeting – project and Examination timeline, relevant representations.
24 February 2025	Monthly MMO Meeting	Non-statutory	Update meeting – project and Examination timeline, relevant representations.
17 March 2025	Monthly MMO Meeting	Non-statutory	Update meeting – Applicants responses to the MMO relevant representations.
13 May 2025	Monthly MMO Meeting	Non-statutory	A meeting to discuss the draft SoCG.
23 June 2025	Online meeting	Non-statutory	A meeting to discuss updates to the SoCG, pre-Deadline 3.
21 July 2025	Online meeting	Non-statutory	A meeting to discuss MMO deadline 3 submission, new commitments made by the Applicants and outstanding matters

## 1.4 Agreement log

1.4.1.1 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 1.4 below.

**Table 1.4: 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.

1.4.1.2 Table 1.5 to Table 1.8 set out the level of agreement between the parties for each relevant component of the application (as identified in section 1.4).

## 1.4.2 Physical Processes

**Table 1.5: Agreement log between the parties on Physical Processes**

Reference Number	Discussion point	Applicants' position	MMO' position	Status
<b>Environmental Impact Assessment (EIA)</b>				
MMO.PP.1	Consultation	The Applicants have undertaken adequate consultation with the MMO on potential impacts on Physical processes.	The MMO agrees that the Applicants have undertaken adequate consultation to date.	Agreed
MMO.PP.2	Consultation	The EIA has had due regard to matters raised by the MMO through statutory and non-statutory consultation on potential impacts on Physical processes.	The MMO agrees that the Applicants have undertaken adequate consultation to date.	Agreed
MMO.PP.3	Policy and planning	The Application has identified and considered the plans and policies relevant to Physical processes, within the MMO's remit.	<p>The MMO is currently reviewing the plans and policies, and is in the process of confirming, the MMO will provide a response at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO have reviewed J28.2 Marine policies tracker (APP-235) and we are satisfied the marine plan policies have been considered sufficiently. Therefore, the MMO are happy to amend this point to Agreed.</p>	Ongoing point of discussion
MMO.PP.4a	Baseline environment	The Applicants have adequately characterised the baseline environment for Physical processes. The baseline is appropriate for the purpose of the EIA.	The MMO is largely content with the baseline environment, noting NE and EA have concerns in relation to information near landfall..	Ongoing point of discussion
MMO.PP.4b	Baseline environment	The Applicants have adequately characterised the baseline environment	The MMO will defer to NE as the competent authorities for HRA's.	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	MMO' position	Status
		for Physical processes. The baseline is appropriate for the purpose of the HRA.		
MMO.PP.5	Scoping	Agreement to the scoping of impacts for the EIA for Physical processes.	Ascertained from the reception of the Agreement logs from the MMO post-application.	Agreed
MMO.PP.6	Assessment methodology	The sensitivity of Physical processes receptors has been correctly identified and sufficiently described within the EIA.	As per response to agreement log and in the MMO Relevant representation (RR-1414, Section 4.3.3).	Agreed
MMO.PP.8	Assessment methodology	The Physical processes modelling is appropriate for predicting impacts on Physical processes receptors.	<p>This remains an ongoing point of discussion. The MMO will provide a response in Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>Within Deadline 3, the MMO noted that prior advice on the project Environmental Information Report (EIR) and ES raised a small number of points that were largely considered to have been addressed, and do not require further action. The MMO deem these comments to be resolved.</p>	Agreed
MMO.PP.9	Assessment methodology	Agreement that the Physical processes modelling strategy for the Environmental Statement is appropriate	<p>This remains an ongoing point of discussion. The MMO will provide a response in Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>Within Deadline 3, the MMO noted that prior advice on the project EIR and ES raised a small number of points that were largely considered to have been addressed, and do not require further action. The MMO deem these comments to be resolved.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.PP.10 a	CEA assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate.	<p>The MMO will confirm this at Deadline 3 EIA's</p> <p><u>Deadline 4 Update</u></p> <p>Within Deadline 3, the MMO noted that prior advice on the project EIR and ES raised a small number of points that were largely considered to have been addressed, and do not require further action. It as considered that critique of the cumulative effects assessment methods would not lead to any substantial improvement in the quality of information that would be obtained, and no further objections to the assessment methodology were raised. The MMO deem these comments to be resolved.</p>	Agreed
MMO.PP.10 b	CEA assessment methodology	The list of projects screened into the Cumulative Effects Assessment (CEA) in the HRA is appropriate.	The MMO will defer to NE as the competent authorities for HRA's.	N/A
MMO.PP.11 a	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects on Physical processes for the impacts from the Transmission Assets alone.	<p>The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The Applicants provided further information at DL3 and the MMO is now content with the Assessment of the effects from Transmission Assets alone on Physical Processes. Please see further information in our Deadline 4 response.</p>	Agreed
MMO.PP.11 b	Assessment of effects on intertidal physical processes	The Applicants have made a commitment (CoT114) to ensure that all permanent infrastructure (i.e. the offshore export cables) located between	The MMO request clarification from the Applicants on beach landing depth.	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	MMO' position	Status
		mean low water springs (MLWS) and mean high water springs (MHWS) will be buried to a target depth of 3 m. In confirmation of this, the Applicants have included a clear commitment that no cable/scour protection shall be deployed in the intertidal between MLWS and MHWS in the Commitments Register submitted at Deadline 4. Therefore there will be no impacts on coastal processes at landfall.		
MMO.PP.12	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on Physical processes for the impacts from the Transmission Assets when considered cumulatively with other plans and projects.	<p>The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 5.</p> <p><u>Deadline 4 Update</u></p> <p>Within Deadline 3, the MMO noted that the cumulative effect assessment method would not lead to any substantial improvement in the quality of information that would be obtained; and not further objections to the assessment methodology were raised. The MMO deems these comments to be resolved.</p>	Ongoing point of discussion
MMO.PP.13	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 2, Chapter 1: Physical processes (APP-042) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided	The measures set out in PEIR chapter have been substantially updated with the measures and commitments listed in the Expert Working Group Meeting 15th August (see Table 1.2) and these are both appropriate and welcome and appear to ensure that the scope for significant effects is very substantially reduced relative to the original proposals (Ascertained from the reception of the Agreement logs from the MMO post-application).	Ongoing point of discussion

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<u>Deadline 4 Update</u> The MMO is continuing discussions with the Applicant in relation to cable burial risk assessments.	

### 1.4.3 Benthic Subtidal and Intertidal Ecology

**Table 1.6: Agreement Log between the parties on Benthic Subtidal and Intertidal Ecology**

Reference Number	Discussion point	Applicants' position	MMO' position	Status
<b>EIA</b>				
MMO.BE.1	Consultation	The Applicants have undertaken adequate consultation with the MMO on potential impacts on Benthic subtidal and intertidal ecology.	The MMO agrees that the Applicants have undertaken adequate consultation with the MMO on potential impacts to Benthic Subtidal and Intertidal ecology.	Agreed
MMO.BE.2	Consultation	The EIA has had due regard to matters raised by the MMO through statutory and non-statutory consultation on potential impacts on Benthic subtidal and intertidal ecology.	The MMO agrees that the Applicants have undertaken adequate consultation with the MMO on potential impacts to Benthic Subtidal and Intertidal ecology.	Agreed
MMO.BE.3	Policy and planning	The Application has identified and considered the plans and policies relevant to Benthic subtidal and intertidal ecology, within the MMO's remit.	<p>The MMO is currently reviewing the plans and policies, and is in the process of confirming, the MMO will provide a response at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO have reviewed J28.2 Marine policies tracker (APP-235) and we are satisfied the marine plan policies have been considered sufficiently. Therefore, the MMO are happy to amend this point to Agreed.</p>	Ongoing point of discussion
MMO.BE.4	Surveys	Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline Benthic subtidal and intertidal ecology environment to inform the EIA.	As per response to agreement log and in the MMO Relevant representation (RR-1414, Section 4.2.2 and 4.2.3).	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.BE.5	Baseline environment	The Applicants have adequately characterised the baseline environment for Benthic subtidal and intertidal ecology.	The MMO is content with the characterisation of the baseline environment.	Agreed
MMO.BE.6	Scoping	Agreement to the scoping of impacts for the EIA for Benthic subtidal and intertidal ecology.	As per response to agreement log and in the MMO Relevant representation (RR-1414, Section 4.2.1).	Agreed
MMO.BE.7	Assessment methodology	The sensitivity of Benthic subtidal and intertidal ecology receptors has been correctly identified and sufficiently described within the EIA and the approach to assessment is appropriate.	The MMO is content with the assessment methodology.	Agreed
MMO.BE.8	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	<p>The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO believes the list of projects screened into the Cumulative Effects Assessment (CEA) in the EIA is appropriate and we do not expect that the construction and operation of the Morgan and Morecambe transmission assets is likely to have a significant impact to Benthic Subtidal and Intertidal Ecology</p>	Agreed
MMO.BE.9	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects on Benthic subtidal and intertidal ecology for the impacts from the Transmission Assets alone (other than the impacts on the Fylde MCZ).	<p>The MMO is currently reviewing the assessment in relation to cable protection and will provide further information at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO are content that there will be no significant effects on Benthic</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			subtidal and intertidal ecology for the impacts on Benthic subtidal and intertidal ecology for the impacts from the Transmission Assets alone.	
MMO.BE.10	Assessment of the effects from the Transmission Assets alone.	With the exception of the Subtidal mud and Subtidal sand features of the Fylde MCZ, all other features of all other MCZs are screened out from further assessment on the basis that there is no significant risk of the project hindering the achievement of the conservation objectives for any other MCZ.	The MMO defers to Natural England regarding the implications on the Fylde MCZ and all other MCZs. (MMO's Relevant representation (1414) Section 5.4.1).	Ongoing point of discussion
MMO.BE.11	Assessment of the effects from the Transmission Assets alone.	There will be no significant risks to the achievement of the conservation objectives of the Fylde MCZ due to the Transmission Assets and therefore, a Stage 2 MCZ Assessment is not required.	The MMO defers to Natural England regarding the implications on the conservation objectives within the Fylde MCZ. (MMO's Relevant representation (1414) Section 5.4.1)	Ongoing point of discussion
MMO.BE.12	Assessment of the effects from the Transmission Assets alone or cumulatively with other projects.	The Applicants have adequately demonstrated that there will be no adverse effects on integrity for SACs designated for any Annex I habitat features for any impacts for the project alone or in combination.	The MMO defers to NE in relation to AEol for SACs.	Ongoing point of discussion
MMO.BE.13	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on Benthic subtidal and intertidal ecology for the impacts from the Transmission Assets when considered cumulatively with other plans and projects (not considering the Fylde MCZ).	<p>The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 3</p> <p><u>Deadline 4 Update</u></p> <p>The MMO will be providing comments at Deadline 4 in regard to cumulative impacts. The MMO broadly agrees with the Applicant's assessments, however, we will defer comments to the relevant specialist advisors/SNCBs.</p>	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.BE.14	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 2, Chapter 2: Benthic subtidal and intertidal ecology (APP-045) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided	<p>The MMO is currently reviewing the assessment in relation to cable protection and if any further information is provided and will provide further information at Deadline 3</p> <p><u>Deadline 4 Update</u></p> <p>The MMO understand that suitable mitigation measures have been proposed and include minimising the requirement for cable crossing within MCZ, ensuring adequate cable burial depths are achieved through appropriate assessment, and a commitment to attempt reburial prior to installation of cable protection measures. The MMO agree with these mitigations and the approach taken to minimise the requirement for cable protection measures within the MCZ.</p> <p>The monitoring objectives for benthic receptors include the impacts on benthic sediments and the associated benthic assemblage within the Fylde MCZ. Following consent, detailed monitoring plans will be submitted to MMO and relevant stakeholders for review and comment. The MMO would expect this to include suitable pre-construction characterisation of the potentially impacted areas within the MCZ to enable subsequent comparison of post-construction condition.</p>	Agreed

## 1.4.4 Fish and Shellfish Ecology

**Table 1.7: Agreement Log between the parties on Fish and Shellfish Ecology**

Reference Number	Discussion point	Applicants' position	MMO' position	Status
<b>EIA</b>				
MMO.FSF.1	Consultation	The Applicants have undertaken adequate consultation with the MMO on potential impacts on Fish and shellfish ecology.	The MMO agrees that the Applicants have undertaken adequate consultation with the MMO on potential impacts to fish and shellfish ecology.	Agreed
MMO.FSF.2	Consultation	The EIA has had due regard to matters raised by the MMO through statutory and non-statutory consultation on potential impacts on Fish and shellfish ecology.	The MMO agrees that the Applicants have had due regard to matters raised on fish and shellfish ecology.	Agreed
MMO.FSF.3	Policy and planning	The Application has identified and considered the plans and policies relevant to Fish and shellfish ecology, within the MMO's remit.	<p>The MMO is currently reviewing the plans and policies, and is in the process of confirming, the MMO will provide a response at deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO have reviewed J28.2 Marine policies tracker (APP-235) and we are satisfied the marine plan policies have been considered sufficiently. Therefore, the MMO are happy to amend this point to Agreed.</p>	Ongoing point of discussion
MMO.FSF.4	Baseline environment	Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline Fish and shellfish ecology environment to inform the EIA.	Noted in the MMOs relevant representation that the generally appropriate data sources have been used and the key species well characterised. (RR-1414, Section 4.4.1)	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.FSF.5	Scoping	Agreement to the scoping of impacts for the EIA for Fish and shellfish ecology.	The MMO is content with the information that has been scoped into the project.	Agreed
MMO.FSF.6	LSE Screening	The approach for determining likely significant effects (LSE) on European sites with Annex I habitats and Annex II diadromous fish as features is appropriate and that all the relevant sites and impact pathways have been identified.	The MMO defers to NE in relation to LSE effects.	N/A
MMO.FSF.7	Assessment methodology.	The sensitivity of Fish and shellfish ecology receptors has been correctly identified and sufficiently described within the EIA.	<p>Further information has been provided in RR on sensitivity assessment and the MMO is reviewing the Applicants response. Comments to be provided at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO is content that the receptors have been correctly identified and described within the EIA.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.FSF.8	Assessment methodology	The approach to underwater sound impacts from UXO clearance is appropriate.	<p>Noted in the MMOs relevant representation that the appropriate impacts have been considered in the ES with the assessment being proportionate to fully identify and assess the potential impacts of underwater sound. (RR-1414, Section 4.7.1) The MMO did also note however that the use of Southall <i>et al.</i>, 2007 and its recommended use of TTS as a proxy for disturbance was not appropriate due to the risk of under-estimating disturbance (RR1414, Section 4.7.2). Comments to be provided at Deadline 3.</p> <p><b>Deadline 4 update</b></p> <p>The MMO notes that the Applicants have committed to updating the Draft DCO to restrict any Unexploded Ordnance (UXO) required to be cleared to 'low-order' methods only.</p> <p>On a 'without prejudice' basis the MMO is content that additional mitigation for this impact is not required.</p> <p>However, should high order UXO detonation be required, this will fall under a separate marine licence and further assessment will be undertaken at time of the marine licence application.</p> <p>The MMO's position is that any UXO clearance should not be within the DML. Please see Table 1, RR-1414-02 within Deadline 4 for further comments.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.FSF.9	Baseline environment	The Applicants have adequately characterised the baseline environment for Fish and Shellfish ecology.	Further information has been provided in RR on sensitivity assessment and the MMO is reviewing the Applicants response. Comments to be provided at Deadline 3.  The MMO is content with the baseline environment characterisation.	Agreed
MMO.FSF.10	CEA assessment methodology	The list of projects screened into the CEA in the EIA is appropriate.	The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 3.  The MMO is content with the projects screened into the CEA.	Agreed
MMO.FSF.11	Assessment of the effects from the Transmission Assets alone.	There will be no significant adverse effects on the integrity for SACs designated for fish features for any impacts from the Transmission Assets alone (noting that the Applicant has committed to updating the Draft DCO to restrict any UXO required to be cleared to 'low-order' methods only).	The MMO defers to NE in relation to AEol for SACs.	N/A
MMO.FSF.12	Assessment of the effects from the Transmission Assets alone.	There will be no significant effects on Fish and shellfish ecology for the impacts from the Transmission Assets alone (noting that the Applicant has committed to updating the Draft DCO to restrict any UXO required to be cleared to 'low-order' methods only)..	The MMO is reviewing the information provided at Procedural Deadline A. Comments to be provided at Deadline 3.  The MMO agrees there is no significant effects on fish and shellfish ecology alone.  The MMO's position is that UXO clearance should not be within the DML. Please see MMO.DCO.2 for further comments.	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.FSF.13	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant adverse effects on the integrity for SACs designated for Fish and shellfish ecology features for any impacts from the Transmission Assets when considered cumulatively with other projects (noting that the Applicant has committed to updating the Draft DCO to restrict any UXO required to be cleared to 'low-order' methods only)..	The MMO defers to NE in relation to AEoI for SACs.	N/A
MMO.FSF.14	Assessment of the effects from the Transmission Assets cumulatively with other projects	There will be no significant effects on Fish and shellfish ecology for the impacts from the Transmission Assets when considered cumulatively with other projects (noting that the Applicant has committed to updating the Draft DCO to restrict any UXO required to be cleared to 'low-order' methods only)..	<p>The MMO is currently reviewing the assessment and will confirm agreement or provide further information at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO wish to keep this comment open for discussion. Whilst we defer final say to Natural England, the MMO would still like to review the cumulative assessments and keep a watching brief over developments between NE and the Applicants.</p>	Ongoing point of discussion
MMO.FSF.15	Mitigation and monitoring	The mitigation measures and monitoring outlined in Volume 2, Chapter 3: Fish and shellfish ecology (APP-048) and the Commitments Register (AS-030) are appropriate and will ensure significant effects are avoided	<p>Due to outstanding issues as set out in our RR this remains an ongoing area of discussion. Comments to be provided at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO notes low order mitigation is proposed which is appropriate. The MMO is still reviewing the monitoring and will provide comments at Deadline 5.</p>	Ongoing point of discussion

## 1.4.5 DCO and deemed Marine Licences

**Table 1.8: Agreement Log between the parties on the Draft Development Consent Order and Deemed Marine Licences**

Reference Number	Discussion point	Applicants' position	MMO' position	Status
<b>Draft Development Consent Order</b>				
MMO.DCO.1	Deemed Marine Licences (Schedules 14, 15, 16 and 17)	The Conditions set out in Schedule 14, 15, 16 and 17 of the DCO, excluding high order UXO clearance (Schedule 14 and 15), are appropriate.	The MMO has provided additional comments within in Deadline 3 response. The MMO will await the Applicants Response at Deadline 4. Comments to be provided at Deadline 5.	Ongoing point of discussion
MMO.DCO.2	Deemed Marine Licences (Schedules 14, 15, 16 and 17)	Condition 20 'UXO Clearance' in Schedule 14 and 15 is appropriate (noting that the Applicants have committed to updating Condition 20 in the Draft DCO to restrict any UXO clearance to low-order techniques only).	<p>The MMO welcomes the commitment to low order UXO clearance only and will review the updated documents.</p> <p>As standard the MMO does not agree with UXO clearances being included within the DML including only low order, however the MMO will provide a without prejudice position should UXO clearance remain within the DML.</p> <p><u>Deadline 4 update</u></p> <p>The MMO notes that the Applicants have committed to updating the Draft DCO to restrict any Unexploded Ordnance (UXO) required to be cleared to 'low-order' methods only and high order will require a separate marine licence.</p> <p>The MMO does not agree with the inclusion of UXO clearance within the DCO/DML.</p> <p>On a without prejudice basis, should the Secretary of State include low order UXO the MMO is satisfied that additional mitigation for this impact is not required. The MMO is reviewing the conditions to ensure nothing else should be included and will provide comments at Deadline 5.</p>	Ongoing point of discussion



Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.DCO.3	Schedule 1 Part 2 Article 6 Benefit of the Order	The inclusion of Article 6 Benefit of the Order in Schedule 1, Part 2 of the draft DCO is appropriate.	The MMO requests that all references to the MMO and DML should be removed from Article 6 for Transfer of Benefit of the Order of the DCO. All references to the MMO and DML should be removed from Article 6 for Transfer of Benefit of the Order of the DCO	Ongoing point of discussion – likely to be 'Not agreed'
MMO.DCO.4	Schedules 14 & 15 Part 2 Condition 17 / Schedules 16 & 17 Part 2 Condition 15 – Force Majeure	The drafting for the 'force majeure' condition is appropriate.	The MMO maintains its position regarding Force Majeure, as it is not necessary to be included within the DMLs. It is not something that the MMO would include in standalone marine licences. Currently the condition wording used is drafted to apply for stress of weather or any other cause which is very broad. It could cover anything, including causes which are entirely within the master's control such as negligence matters.	Ongoing point of discussion – likely to be 'Not agreed'

## 1.4.6 Other Documents and Plans

**Table 1.9: Agreement Log between the parties on Other Documents and Plans**

Reference Number	Discussion point	Applicants' position	MMO' position	Status
<b>Outline Marine Mammal Mitigation Protocol (MMMP)</b>				
MMO.OP.1	oMMMP	<p>The Outline MMMP is appropriate (noting that the Applicants have committed to updating Condition 20 of the dMLs at Schedules 14 and 15 of the draft DCO to restrict any UXO clearance to low-order techniques only- Mitigation for high order UXO detonation will still be included as an Addendum to the Outline MMMP to align with the assessment of high order UXO in Volume 2, Chapter 4: Marine Mammals (APP-050) and to support a separate standalone marine licence if high order clearance is required).</p> <p>22 July 2025: The Outline MMMP will be updated for Deadline 4 to address comments from IPs including reference to seals.</p>	<p>The MMO is reviewing this document and notes further updates will be provided by the Applicants in due course. Comments to be provided at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The MMO is awaiting an updated version of the document and will provide comments at Deadline 5.</p>	Ongoing point of discussion
<b>Offshore In Principle Monitoring Plan</b>				
MMO.OP.2	oIPMP	<p>The Offshore IPMP is appropriate.</p> <p>23 June 2025: An updated Offshore IPMP will be submitted at Deadline 3.</p> <p>22 July 2025: The Offshore IPMP will be updated for Deadline 4 to capture the Applicants new commitment to pre and post construction benthic monitoring within the Fylde MCZ.</p>	<p>The MMO is reviewing this document and will provide comments at Deadline 1.</p> <p>23 June 2025: The MMO will review the updated Offshore IPMP submitted at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The MMO is awaiting an updated version of the document and will provide comments at Deadline 5.</p>	Ongoing point of discussion
<b>Outline Offshore Operations and Maintenance Plan</b>				

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.OP.3	oO&MP	<p>The Outline Offshore O&amp;M Plan is appropriate.</p> <p>23 June 2025: An updated Outline O&amp;M Plan will be submitted at Deadline 3.</p> <p>22 July 2025: The Outline Offshore O&amp;M Plan was not submitted at Deadline 3 due to the Applicant clarifying update requirements with the MMO and will be submitted at Deadline 4.</p>	<p>The MMO is reviewing this document and will provide comments at Deadline 1.</p> <p>23 June 2025: The MMO will review the updated Outline O&amp;M Plan submitted at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The MMO is awaiting an updated version of the document and will provide comments at Deadline 5.</p>	Ongoing point of discussion
<b>Outline Fisheries Liaison and Co-existence Plan</b>				
MMO.OP.4	oFLCP	<p>The Outline FLCP is appropriate.</p> <p>23 June 2025: An updated oFLCP will be submitted at Deadline 3.</p>	<p>The MMO is reviewing this document and will provide comments at Deadline 1.</p> <p>23 June 2025: The MMO will review the updated oFLCP submitted at Deadline 3.</p> <p><u>Deadline 4 Update</u></p> <p>The MMO believes the scope of the Outline Fisheries Liaison and Co-existence Plan (FLCP) is appropriate and will be informed by suitable best practice guidance and welcomes the updates in relation to the MMO.</p> <p>The MMO strongly advises that the Applicants seeks input from the Northwest Inshore Fisheries and Conservation Authority (NWIFCA) and the National Federation of Fishermen's Organisation (NFFO) along with the local fishing industry in the formulation of the final fisheries liaison strategy.</p> <p>This will remain an ongoing point of discussion until the final outline plan is submitted.</p>	Ongoing point of discussion
<b>Outline Offshore Cable Specification and Installation Plan</b>				

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.OP.5	oCSIP	The Outline oCSIP is appropriate. 23 June 2025: An updated oCSIP was submitted at Deadline 2.	The MMO is reviewing this document and will provide comments at Deadline 1. 23 June 2025: The MMO will provide comments at Deadline 3. <u>Deadline 4 update</u> The MMO is content with the document from a fisheries review. There are still some outstanding concerns that require addressing. The MMO notes that further information was provided by the Applicants at Deadline 3 and the MMO aims to provide updates at Deadline 5.	Ongoing point of discussion
<b>Outline Cable Burial Risk Assessment</b>				
MMO.OP.6	oCBRA	The Outline CBRA is appropriate.	The MMO is reviewing this document and will provide comments at Deadline 1. 23 June 2025: The MMO will provide comments at Deadline 3. <u>Deadline 4 update</u> The MMO is content with the document form a fisheries review. There are still some outstanding concerns that require addressing. The MMO notes that further information was provided by the Applicants at Deadline 3 and the MMO aims to provide updates at Deadline 5.	Ongoing point of discussion