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# **MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS**

**Annex 2.4 to Applicants' Response to Deadline 4 submissions from Statutory Consultees and other organisation: Marine Management Organisation (REP4-137)**



**Deadline: Deadline 5**  
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# **1 Applicants' Response to IPs' Submissions at Deadline 4**

## **1.1 Introduction**

- 1.1.1.1 Following Deadline 4, Morgan Offshore Wind Limited ('Morgan OWL') and Morecambe Offshore Windfarm Limited ('Morecambe OWL'), (together, 'the Applicants') have taken the opportunity to review each of the submissions from Interested Parties. This includes Written Representation, post-hearing submissions as well as responses to ExQ1.
- 1.1.1.2 Details of the Applicants' response to the MMO is set out in this annex.
- 1.1.1.3 The Applicants have numbered the submissions in line with the Planning Inspectorate's document library, with subsequent paragraph number, e.g. REP4-001.1, REP4-001.2, etc.

## 2 Applicants' Response to IPs' submissions at Deadline 4

### 2.1 Response to IP submissions

Table 2.1: Summary of Deadline 4 responses

Reference	IP submission	Applicants' response
<b>1. Comments on REP3-054 Applicants Response to IP submission at Deadline 2: Marine Management Organisation (Revision 1)</b>		
1.1.1 and 1.1.2	<b>1.1 General Comments</b> The MMO will provide comments at Deadline 5.  The MMO response to the Applicants Pre-Examination Procedural Deadline A Submission to the MMO; MMO Deadline 3 Response update can be viewed in Table 1.	The Applicants note this comment and welcomes updates from the MMO at Deadline 5.
<b>2. MMO comments on the updated In Principal Monitoring Plan (IPMP) (REP3-032)</b>		
2.1.1	<b>2.1 General Comments</b> The MMOs Strategic Renewables Unit (SRU) has published guidance for offshore wind developers: Standardisation of Post-Consent Environmental Monitoring for Wind Farms in English Waters.	The Applicants highlight that the Offshore In Principle Monitoring Plan (OIPMP) was updated at Deadline 4 (REP4-074) to incorporate the recently published MMO guidance.
2.2.1	<b>2.2 Adaptive management</b> The MMO outlines the standard conditions to implement a more proactive process to manage issues should monitoring reveal a greater impact than originally assessed within the ES.	The Applicants have updated the OIPMP at Deadline 5 (J20/F04)) to incorporate and secure adaptive management.
2.3.1	<b>2.3 Benthic Ecology</b> The MMO outlines the revisions and amendments made at Deadline 3 in which we're in agreement with. We also highlight monitoring objectives to be included within a suitable pre-construction characterisation report.	The Applicants highlight that the OIPMP was updated at Deadline 4 (REP4-075), to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ.

Reference	IP submission	Applicants' response
		<p>Regarding monitoring objectives, Condition 24(2) (Pre-construction monitoring and surveys) of Schedule 14 and Schedule 15 of the draft DCO (REP4-007) state that:</p> <p><i>"The survey proposals submitted under sub-paragraph (1) must be in general accordance with the principles set out in the offshore in principle monitoring plan and must specify each survey's objectives and explain how it will assist in either informing a useful and valid comparison with the post-construction position or will enable the validation or otherwise of key predictions in the environmental statement"</i>.</p> <p>Furthermore limb (3) of Condition 24 states that:</p> <p><i>"The baseline report proposals submitted under sub-paragraph (1) must ensure that the outcome of the agreed surveys, together with existing data and reports, are drawn together to present a valid statement of the pre-construction position, with any limitations, and must make clear what post-construction comparison is intended and the justification for this being required."</i></p> <p>Therefore, it is the Applicants' position that this matter is adequately addressed in the condition.</p>
2.4.1 and 2.4.2	<p><b>2.4 Fish Biology and Fisheries</b></p> <p>The MMO is generally content with the measures and monitoring laid out in the IPMP.</p> <p>The Cumulative Effects Assessment is appropriate.</p>	The Applicants welcome these comments from the MMO.
2.5.1 and 2.5.2	<p><b>2.5 Physical Processes</b></p> <p>The MMO notes only one outstanding comment regarding cable burial yet to be resolved.</p> <p>The IPMP doesn't explicitly consider impact assessments for the transmission assets, however, major impacts are unlikely.</p>	Please see responses to 2.5.1 and 2.5.2 in Table 2.2 below.
2.6.1	<b>2.6 Marine Archaeology</b>	The Applicants note this comment. The Applicants would highlight that all matters are now agreed between the Applicants and Historic England as set out in the Statement of Common Ground submitted at Deadline 4 (REP4-082).

Reference	IP submission	Applicants' response
	The MMO notes that Archaeological Exclusion Zone monitoring has been updated, and we defer to Historic England for its suitability.	
<b>3. MMO Comments on Stage 2 MCZ Assessment - Rev F01 Annex A: Review of potential measures of equivalent environmental benefit (MEEB) (APP-227)</b>		
3.1.1	<b>3.1 General Comments</b> The MMO agrees with Natural England that any cable protection will result in habitat change/loss. The MMO defers comment to Natural England on the Stage 2 MCZ Assessment.	The Applicants note this comment.
<b>4. MMO Comments on J13 Outline Fisheries Liaison and Coexistence Plan (REP3-028)</b>		
4.1.1	<b>4.1 General Comments</b> The MMO believes the FLCP is appropriate, and we defer final comments to IFCA and NFFO.	The Applicants note this comment.
<b>5. MMO Comments on J22 Dredging and Disposal – Site Characterisation Plan (APP-227)</b>		
5.1.1	<b>5.1 General Comments</b> The Applicants have provided adequate information to characterise the disposal site.	The Applicants welcome this comment. The Applicants would highlight that the Dredging and Disposal – Site Characterisation Plan has been updated at Deadline 5 (J22/F02) to limit sandwave clearance within the Fylde MCZ to Controlled Flow Excavator in response to comments by Natural England.
5.2.1 and 5.2.2	<b>5.2 Mitigation Measures</b> The MMO notes the amendments the Applicants have made in response to a Section 42 comment from Natural England  The MMO is satisfied that alternative use and best protocols have been considered and implemented.	The Applicants welcome this comment.

Reference	IP submission	Applicants' response
5.3.1 to 5.3.4	<p><b>5.3 Baseline Environment</b></p> <p>The MMO defers to the relevant advisors regarding physical ecology characteristics.</p> <p>The MMO outlines the chemical characterisations provided by the Applicants and provide analyses of the contaminant levels.</p> <p>All data from sampling should be provided in an MMO template for use with Cefas Action Level Viewer.</p> <p>The MMO reminds the Applicants that if works have not commenced within 3-5 years of the 2022 data provided, the MMO may suggest additional surveys and chemical characterisation would be required prior to construction.</p>	<p>The Applicants have provided the sediment data in the MMO template to the MMO via email on 16<sup>th</sup> September 2025.</p> <p>The Applicants note the response relating to the chemical characterisation but would query how this relates to the MMO's Marine Licensing: Sediment Analysis Guidance which states that "<i>the data must also have been collected within 3 to 5 calendar years from the date you submitted your marine licence application, and we accepted it.</i>" The Applicants therefore seek clarification on this point. The Applicants would highlight that no other construction works are scheduled to spatially overlap with the Transmission Assets and given the low levels of contaminants recorded in the site specific survey, significant changes from this baseline which would result in exceedances of Cefas Action Levels, prior to the commencement of construction, are considered highly unlikely. The anticipated earliest construction start date for the Transmission Assets (i.e., both Morgan Offshore Wind Project: Transmission Assets and Morecambe Offshore Windfarm: Transmission Assets) is 2027 (as set out under section 3.9 of Volume 1, Chapter 3: Project description (REP2-008)).</p>
5.4.1	<p><b>5.4 Cumulative Impacts</b></p> <p>The MMO broadly agree with the in-combination characterisation report, but we defer to the relevant advisors with specialist knowledge of the receptors assessed.</p>	The Applicants note this comment.
<b>6. MMO Comments on updated Outline Offshore Operations and Maintenance Plan (OOOMP)</b>		
6.1.1	<p><b>6.1 General Comments</b></p> <p>The MMO notes that an updated OOOMP will now be submitted at Deadline 4, and we aim to provide comments on this at Deadline 5.</p>	The Applicants note this comment.
<b>7. MMO Comments on the Without Prejudice Benthic Compensation DCO Schedule</b>		
7.1.1 to 7.1.3	<p><b>7.1 General comments</b></p> <p>The MMO highlights Natural England's disagreement with the Applicants assessment of small-scale losses not hindering the conservation objectives of the Fylde MCZ.</p>	The Applicants have responded in full to Natural England's comments in (REP4-100) and have provided an updated without prejudice MEEB Schedule to reflect these comments (S_D3_9/F02).



Reference	IP submission	Applicants' response
	<p>The MMO note some wording amendments required by the Applicants.</p> <p>Benthic compensation will be updated at Deadline 4 within the IPMP.</p>	
<b>8. MMO comments on the Change Request – Indicative Overview Plan</b>		
8.1.1	<p><b>8.1 General Comments</b></p> <p>The MMO recognises that the Applicants have notified the ExA that they intent to submit a request to make changes to the application. The changes do not appear to relate to the marine environment; therefore, we have no further comment at this time.</p>	The Applicants note this comment.
<b>9. MMO Comments on Issue Specific Hearing (ISH) 2</b>		
9.1.1	<p>The MMO highlights areas of interest to matters within their remit. There were no specific action points for the MMO at this stage.</p>	The Applicants note this comment.
<b>10. MMO Comments on Issue Specific Hearing (ISH) 3</b>		
10.1.1	<p>The MMO highlights areas of interest to matters within their remit. There were no specific action points for the MMO at this stage, however, we acknowledge that further ExA written questions will be submitted to us shortly.</p>	The Applicants note this comment.
<b>11. MMO comments on the Statement of Common Ground (SoCG) (REP3-049)</b>		
11.1.1	<p><b>11.1 General Comments</b></p> <p>The MMO had a meeting with the Applicants on 21 June 2025, following this meeting an amended version of the SoCG will be submitted at Deadline 4 by the Applicants.</p>	The Applicants note this comment.
11.2.1	<p><b>11.2 Fish Ecology</b></p> <p>The MMO confirms the remaining issues from previous Deadlines which have been resolved.</p>	The Applicants welcome this comment from the MMO.

Reference	IP submission	Applicants' response
11.3.1	<b>11.3 Coastal Processes</b> The MMO confirms the remaining issues from previous Deadlines which have been resolved, and highlights issues which should remain open.	The Applicants note this comment.
11.4.1	<b>11.4 Benthic Ecology</b> The MMO confirms the remaining issues from previous Deadlines which have been resolved, and which we will defer comment to Natural England.	The Applicants welcome this comment and note that points MMO.BE.3, MMO.BE.8, and MMO.BE.9 in Table 1.6 in the SoCG (REP4-084) relating to benthic ecology are now agreed.
<b>12. Comments on other Stakeholder's Deadline 3 Responses</b>		
12.1.1	The MMO has reviewed and provided comments on the following Stakeholder Deadline 3 Responses: <b>12.1 Blackpool Borough Council (BBC) (REP3-076)</b> The MMO notes outstanding areas of concern between the Applicants and BBC.	The Applicants note this comment. Please see responses in Table 2.3 below.
12.2.1	<b>12.2 Environmental Agency (EA) (REP3-079 &amp; REP3-081)</b> The MMO highlights issues regarding contamination and the updated Ecological Management Plan, and will be keeping a watching brief over these developments.	The Applicants note this comment.
12.3.1	<b>12.3 Maritime and Coastguard Agency (MCA) (REP3-086)</b> The MMO notes that the MCA is satisfied with the post-construction bathymetry surveys and monitoring for cable burial.	The Applicants note this comment.
12.4.1	<b>12.4 Natural England (NE) (REP3-090 – 092)</b> The MMO highlights areas of concern still outstanding between these parties and we will be keeping a watching brief over these matters.	The Applicants note this comment. Please see responses in Table 2.1 below.
12.5.1	<b>12.5 The Corporation of Trinity House of Deptford Strond (TH) (REP3-111)</b>	The Applicants note this comment.

Reference	IP submission	Applicants' response
	The MMO notes the amendment to 'Arbitration' in Schedule 14 & 15, Condition 14 (18(b)) and Condition 15, and that TH are satisfied with these amendments.	

**Table 2.2: MMO's comments on Disposal Site Designation**

Reference	IP submission	Applicants' response
1.1	The Marine Management Organisation (MMO) has recently consulted on EN020032-000574-J22_MMTA_Dredging and disposal site characterisation plan.pdf (APP-227) with the Centre for Environment Fisheries and Aquaculture Science (Cefas). As part of this consultation the MMO requested the Morgan and Morecambe Offshore Windfarm Transmission Assets disposal sites as proposed by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (the Applicants), to be considered.	The Applicants note this comment.
1.2	The disposal sites have now been created. Please find the disposal site reference numbers below, to be referenced within the Development Consent Order (DCO) and the Deemed Marine Licence (DML): <ul style="list-style-type: none"> <li>IS156 Morgan and Morecambe</li> </ul>	

**Table 2.3: REP4-137 – Marine Management Organisation: MMO's Response to the Applicants' Pre-Examination Procedural Deadline A Submission to the MMO**

Reference	IP submission (MMO's Deadline 4 response)	Applicants' response at Deadline 5
REP4-137 RR-1414-02	The MMO notes that the Outline Marine Mammal Mitigation Protocol was not updated at Deadline 3. The MMO provided comments at Deadline 3 (REP3-085) and will maintain a watching brief.	The Applicants confirm that the Outline Marine Mammal Mitigation Protocol was updated for Deadline 4 (REP4-070) in response to the MMO's comments at Deadline 3.

Reference	IP submission (MMO's Deadline 4 response)	Applicants' response at Deadline 5
	The MMO may provide further comments at Deadline 5 if required.	
REP4-137 RR-1414-03	The MMO provided comments at Deadline 3 (REP3-085) and will maintain a watching brief.  The MMO may provide further comments at Deadline 5 if required.	The Applicants note this comment.
REP4-137 RR-1414-06, RR-1414-07 to RR-1414-14	The MMO and the Applicants believes that we are unlikely to come to an agreement on this matter.  If we have any new comments, we may provide further comments at future deadlines.	The Applicants note this comment regarding Article 6 'Benefit of the Order'.
REP4-137 RR-1414-18	The MMO notes and thanks the Applicants for providing the requested changes and removing references to 'materially', noting that the definition of maintain has been amended to: <i>"maintain" includes inspect, upkeep, repair, adjust and alter the authorised project, and further includes remove, reconstruct, and replace any part of the authorised project, to the extent assessed in the environmental statement and any derivative of "maintain" shall be construed accordingly.</i>  The MMO considers his matter closed.	The Applicants welcome this comment from the MMO and note that the MMO consider this matter closed.
REP4-137 RR-1414-19	The MMO notes that the Applicants position is that inclusion of condition 19 (2) in Schedules 14 & 15 is important for programming.  The MMO's position has not changed and the MMO believes 19(2) should be removed.  IF this is not removed the MMO believes this should be 6 months to align with the 6 month submission date, otherwise the 6 month submission date is not 6 months but 4 months with condition 19(2).	The Applicants have reviewed the deemed marine licence of this draft DCO (REP4-007) against the recently granted Morgan Generation Offshore Wind Farm Order and have made amendments to align these where practicable, including the removal of the time limit on the MMO to make decisions at condition 19(2) of Schedules 14 and 15 and 17(2) of Schedules 16 and 17 (C1/F07).
REP4-137 RR-1414-20	The MMO does not believe that precedent alone is enough to maintain a condition. There is a clear issue in relation to	The Applicants have reviewed the deemed marine licence of this draft DCO (REP4-007) against the recently granted Morgan Generation Offshore Wind

Reference	IP submission (MMO's Deadline 4 response)	Applicants' response at Deadline 5
	<p>vagueness of 'and any cause' and therefore the MMO believes this should be resolved and if not, the condition should be removed.</p> <p>The MMO notes that this is likely to be an agree to disagree position and a matter for the SoS to decide on.</p> <p>The MMO may provide further comments at future deadlines.</p>	<p>Farm Order and have made amendments to align these where practicable, including at condition 17 of Schedules 14 and 15 and condition 15 of Schedules 16 and 17 (C1/F07) regarding Force Majeure.</p>
REP4-137 RR-1414-22	<p>The MMO thanks for Applicants for confirming the MMO's understanding in relation to the worst-case scenario assessed within the Environmental Statement.</p>	<p>The Applicants note this comment.</p>
REP4-137 RR-1414-23	<p>The MMO will continue discussions with the Applicants outside of Deadlines and provide further comments to the ExA at Deadline 5.</p>	<p>The Applicants note this comment and welcome updates at Deadline 5.</p> <p>The Applicants highlight that the following document was submitted at Deadline 4 'Annex to Applicants response to MMO and NE submission at Deadline 3: Assessment of Seabed Level Vertical Variability for Morgan Offshore Wind Farm- Appendix C' (REP4-122).</p>
REP4-137 RR-1414-24	<p>The MMO confirms that they have reviewed the updated documents, and we provided further comment at Deadline 2 (REP2-061 Section 3.6).</p> <p>The MMO has no outstanding comments on this point and consider the matter resolved.</p>	<p>The Applicants welcome this comment from the MMO and note that the MMO consider this matter closed.</p>
REP4-137 RR-1414-25	<p>The MMO will continue to maintain a watching brief.</p>	<p>The Applicants note this comment.</p>
REP4-137 RR-1414-26	<p>The MMO has provided comments in Section 5 of this document.</p> <p>The MMO highlighted to the Applicants in a meeting on 21 July 2025 that there is currently ongoing engagement with the fishing industry in relation to Bass fishing and the impact from vessel disturbance in relation to the geophysical surveys.</p> <p>The MMO has recommended the industry become an Interested Party within this examination if they have concerns. This is an</p>	<p>The Applicants note this comment.</p>

Reference	IP submission (MMO's Deadline 4 response)	Applicants' response at Deadline 5
	ongoing matter and if the ExA request the MMO can provide further details once the matter is resolved.	
REP4-137 RR-1414-27	<p>The MMO has provided a response at Deadline 2 (REP2-061) and Deadline 3 (REP3-087).</p> <p>The MMO will keep a watching brief on the Applicants response and will provide further comments to the Applicants as soon as possible and provide an update to the ExA at Deadline 5.</p>	The Applicants note this comment.
REP4-137 RR-1414-28	<p>The MMO notes that the Applicants has updated the draft DCO to address comments raise by MCA and Trinity House. The MMO welcomes these updates and defers to the Maritime and Coastguard Agency and Trinity House on matters of shipping and navigation and supports any comments raised. The MMO will continue to keep a watching brief in relation to the DML wording.</p>	The Applicants note this comment.
REP4-137 RR-1414-32	<p><b>Outline Fisheries Liaison and Coexistence Plan (REP3-028)</b></p> <p>The MMO has provided comment in Section 5 of this document.</p> <p><b>Measures to minimise disturbance to marine mammals and rafting birds from vessels (APP-221)</b></p> <p>The MMO notes that at Deadline 3 we stated "The MMO notes that further consideration must be made to address the overall disturbance from elevated underwater sound due to other sound producing activities within the Offshore Environmental Management Plan, as the mitigation measure to minimise disturbance to marine mammals are only relevant to the transiting vessel."</p> <p>The Applicant's requested clarification on the noise sources of concern.</p> <p>The MMO responded to the Applicant's via email on 23 July 2025 to confirm that no further information was required for this topic.</p> <p><b>Offshore in principle Monitoring Plan (OIPMP) (APP-225)</b></p>	<p><b>Outline Fisheries Liaison and Coexistence Plan (REP3-028)</b></p> <p>Please see responses in Section 4 of Table 2.2 below.</p> <p><b>Measures to minimise disturbance to marine mammals and rafting birds from vessels (APP-221)</b></p> <p>The Applicants note this response, and that no further information is required for this topic.</p> <p><b>Offshore in principle Monitoring Plan (OIPMP) (APP-225)</b></p> <p>The Applicants note this response. In addition to the monitoring already proposed for the recovery of sediments and seedbed features in the Fylde MCZ, the Applicants would highlight that the OIPMP was updated at Deadline 4 (REP4-075) to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ. Benthic community monitoring within the Fylde MCZ is therefore secured through inclusion in the OIPMP.</p>

Reference	IP submission (MMO's Deadline 4 response)	Applicants' response at Deadline 5
	<p>The MMO notes that section 1.7 has been revised to clarify the Applicants position regarding the conclusions of the ES, and how these relate to benthic monitoring.</p> <p>The MMO notes that Table 1.3 has been updated to clarify the benthic monitoring approach within the Fylde Marine Conservation Zone, specially to state that the potential effects on the MCZ because of the works will occur during the operations and monitoring phase of the Project.</p> <p>The MMO notes the Applicants are committed to monitor the recovery of sediments and associated benthic assemblage within the MCZ and this will be secured through relevant conditions within the Development Consent Order (DCO).</p>	
REP4-137 RR-1414-33	<p>The MMO notes that the Outline Marine Mammal Mitigation Protocol will be submitted at Deadline 4, including updates to address MMO comments made at Deadline 3.</p> <p>Therefore, the MMO will review this following Deadline 4 submission and provide updates at Deadline 5.</p>	The Applicants note this comment and welcome updates at Deadline 5.
REP4-137 RR-1414-35	The MMO provided a response at Deadline 3 (REP3-085) in section 2.11. The MMO will review the Applicant's comments at Deadline 4 and provide a response at Deadline 5.	The Applicants note this comment and welcome updates at Deadline 5.

**Table 2.4: REP4-137 – Marine Management Organisation : MMO's comments on documents**

Reference	IP submission	Applicants' response
<b>2. MMO comments on the updated Offshore In Principal Monitoring Plan (OIPMP) (REP3-032)</b>		
2.1.1 and 2.1.2	<p><b>2.1 General Comments</b></p> <p>The MMOs Strategic Renewables Unit (SRU) has published a Standardisation of Post-Consent Environmental Monitoring for Wind Farms in English Waters which is guidance for offshore wind developers on</p>	The Applicants would highlight that the OIPMP was updated at Deadline 4 (REP4-074) to incorporate the recently published MMO guidance.

Reference	IP submission	Applicants' response
	<p>post-consent monitoring standards. Please ensure the IPMP is updated to reference the specific guidance.</p> <p>The monitoring required for each offshore wind farm project will continue to be agreed on a case-by-case basis through discussions between Applicants, the relevant Statutory Nature Conservation Body (SNCB), and the MMO to deem what is applicable for the project area.</p>	
2.2.1	<p><b>2.2 Adaptive Management</b></p> <p>The MMO has a standard condition for adaptive management, noting a similar condition has been implemented in Sheringham and Dudgeon Offshore Wind farm. This has been requested in the more recent OWF examinations due to issues occurring in older OWF that are in the post construction monitoring phase.</p>	The Applicants have updated the OIPMP at Deadline 5 (J20/F04) to include for adaptive management.
2.2.2	The MMO wishes to implement a more proactive process to manage issues in the event that monitoring shows a greater impact than that assessed in the Environmental Statement and enable the Applicants to start discussions at the earliest opportunity alongside the monitoring report submission (or before in some circumstances).	
2.2.3	<p>The MMO proposes updates to the Post Construction Condition 26 drafting is below:</p> <p>“(6). In the event that the reports provided to the MMO under sub-paragraph (4) identify a need for additional monitoring, the requirement for any additional monitoring will be agreed with the MMO in writing and implemented as agreed.</p> <p>(7). In the event that monitoring reports provided to the MMO under sub-paragraph (4), identifies impacts which are beyond those predicted within the Environmental Statement/Habitat Regulations Assessment, adaptive management/mitigation may be required. An Adaptive</p>	



Reference	IP submission	Applicants' response
	<p>Management/Mitigation Plan to reduce effects to within what was predicted within the Environmental Statement/Habitat Regulations Assessment, unless otherwise agreed in writing by the MMO, must be submitted alongside the monitoring reports submitted under sub-paragraph (4), including timelines and associated monitoring to test effectiveness. This plan must be agreed with the MMO in consultation with the relevant SNCBs to reduce effects to a suitable level for this project.</p> <p>(8) Any such agreed or approved adaptive management/mitigation should be implemented and monitored in full. In the event that this adaptive management/mitigation requires a separate consent, the Applicants shall apply for such consent."</p>	
2.2.4	The additional conditions ensure that all parties are clear what is required if the monitoring shows greater impacts than predicted during the assessment stage. It also allows the Applicants to themselves provide potential solutions when reviewing the results of monitoring, to be discussed with the MMO and SNCBs.	
2.2.5	The aim of the condition is to provide a clear process to the Applicants, the MMO and any consultees, if in preparing the monitoring reports the Applicants identifies greater impact than the Environmental Statement (ES) predicted rather than just a discussion upon review of the reports.	
2.2.6	The MMO notes that if impacts are greater than predicted we can utilise Section 72 of 2009 Act and vary the marine licence to request and required additional monitoring or adaptive management, but believes this Condition gives a clear process to all and allows for proactive management rather than reactive management by the MMO.	
2.3.1	<b>2.3 Benthic Ecology</b>	The Applicants note this comment.

Reference	IP submission	Applicants' response
	The MMO notes that section 1.7 has been revised to clarify the Applicants position regarding the conclusions of the ES, and how these relate to benthic monitoring.	
2.3.2	The MMO notes that Table 1.3 has been updated to clarify the benthic monitoring approach within the Fylde Marine Conservation Zone, specially to state that the potential effects on the MCZ because of the works will occur during the operations and monitoring phase of the Project	The Applicants highlight that the OIPMP was updated at Deadline 4 (REP4-075), to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through both pre-construction and post-construction benthic community sampling to monitor for temporal and spatial recovery and of the potential colonisation by Invasive Non-Native Species (INNS) following construction activities within the Fylde MCZ.
2.3.3	The MMO note the Applicant is committed to monitor the recovery of sediments and associated benthic assemblage within the MCZ and this will be secured through relevant conditions within the Development Consent Order (DCO).	
2.3.4	Suitable mitigation measures have been proposed by the Applicants and include minimising the requirement for cable crossing within the 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 agrees with these mitigations and the approach taken to minimise the requirement for cable protection measures within the MCZ.	The Applicants welcome this comment from the MMO. The Applicants highlight that the Commitments Register was updated at Deadline 4 (REP4-018) to include a new commitment (CoT134) stating <i>"As part of the detailed design process, micro-siting of the offshore export cables within the offshore export cable corridors will be considered where successful burial could pose a challenge or where a higher risk of remedial works such as external cable protection may be required"</i> .
2.3.5	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 the 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.	The Applicants highlight that the OIPMP was updated at Deadline 4 (REP4-075), to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ which includes for suitable pre-construction characterisation of the potentially impacted areas within the MCZ to enable subsequent comparison of post-construction.
2.4.1	<b>2.4 Fish Biology and Fisheries</b>	The Applicants welcome this comment from the MMO.

Reference	IP submission	Applicants' response
	The IPMP does not propose additional fisheries-specific measures or monitoring, however, the MMO is generally content with this.	
2.4.2	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. The MMO is satisfied that additional mitigation for this impact is not required. 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 licence application.	The Applicants welcome this comment from the MMO.
2.4.3	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 fisheries or fish ecology, alone or cumulatively with other projects.	The Applicants welcome this comment from the MMO.
2.5.1	<p><b>2.5 Physical Processes</b></p> <p>The MMO notes that there is only one unresolved comment from previous advice:</p> <p><i>To ensure that target cable burial at the nearshore/landfall was defined with consideration for natural shoreline retreat and hence potential shoreline realignment (natural or managed).</i></p> <p>The Applicant's provided a response at Deadline 2 and the MMO are still in the process of reviewing these comments. We will provide an update to the Applicants as soon as we receive this information and to the ExA at Deadline 5.</p>	<p>The Applicants provided further information on landfall and shoreline burial depths at Deadline 4 in response to MMO comments regarding outline Offshore Cable Specification and Installation Plan, specifically under Section 5.3 (page 23) of the 'Applicants' Response to Deadline 3 submissions from Statutory Consultees and other organisation: Marine Management Organisation (REP3-085)' at Deadline 4 (REP4-099).</p> <p>This outlined that in terms of shoreline retreat, the analysis undertaken by the Applicants confirms a trend of sediment accumulation and dune migration seaward, rather than significant shoreline recession, at the selected landfall site. Additionally, the detailed assessment of beach level variability identified a conservative level of +/- 1.5m. The supporting document 'Annex to Applicants response to MMO and NE submission at Deadline 3: Assessment of Seabed Level Vertical Variability for Morgan Offshore Wind Farm - Appendix C' (REP4-122) submitted at Deadline 4 provides analysis relating to the landfall and shoreline burial depths.</p>
2.5.2	The Cable Burial Risk Assessment (CBRA) in the sections KP0 - KP0.75 refers to a lack of geophysical survey coverage and notes that sediment morphology is to be confirmed, but " <i>intertidal variability [is] understood to be +/-</i>	

Reference	IP submission	Applicants' response
	1.5m". The assessment then adds that a <i>"minimum [depth of lowering of] 3.0m is considered adequate at this stage"</i> . The MMO take this reference to depth of lowering to mean burial depth, in which case the assessment does not indicate any allowance for shoreline retreat at this location. However, this assessment may need to be clarified in the CBRA.	
2.5.3	No further mitigation measures are provided in the IPMP regarding cable monitoring, only the commitment to monitor cables and their burial status during the operations and maintenance phase (Table 1.2, 'Offshore in Principle Monitoring Plan').	The Applicants note this comment.
2.5.4	The cable route characterisation is generally adequate, noting the specific details of the cable route remain to be determined by detailed surveying and risk assessment for cable laying.	The Applicants note this comment.
2.5.5	The IPMP does not explicitly consider impact assessment for the transmission assets. However, in our previous advice, it was noted that major impacts from cable installation are not likely to occur, while recognising that specific detailed risk assessments may identify localised areas of concern.	The Applicants note this comment.
2.6.1	<b>2.6 Marine Archaeology</b> The MMO notes the monitoring approach for Archaeological Exclusion Zones (AEZs) in the pre-construction phase has been updated. The MMO will defer comment to Historic England (HE) on the suitability of this.	The Applicants note this comment. The Applicants would highlight that all matters are now agreed between the Applicants and Historic England as set out in the Statement of Common Ground submitted at Deadline 4 (REP4-082).
2.6.2	Additionally, the MMO notes the inclusion of the same AEZ monitoring approach as above, but for the Operations and Maintenance phase. The MMO welcomes this addition, and we will be deferring comment on the suitability of this to HE.	

Reference	IP submission	Applicants' response
<b>3. MMO Comments on Stage 2 MCZ Assessment - Rev F01 Annex A: Review of potential measures of equivalent environmental benefit (MEEB) (APP-227)</b>		
3.1.1	<p><b>3.1 General Comments</b></p> <p>The MMO welcomes that the Applicants have undertaken a Stage 2 MCZ Assessment and without prejudice MEEB.</p>	The Applicants note this comment.
3.1.2	<p>The MMO agrees with Natural England (NE) that whilst the cable protection is in situ, the extent and distribution attribute of the site features can neither be maintained or restored. It is advised that the impacts will result in 'lasting' habitat change from mud and sand to hard substrata which may result in habitat loss as removal and/or recovery post removal is not guaranteed.</p>	<p>The Applicants note this comment and whilst the Applicants' MCZ Screening and Stage 1 Assessment Report (APP-019) concluded that there would be no hindrance to the conservation objectives of the Fylde MCZ as a result of cable protection for the Transmission Assets, the Applicants have provided a Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan at Deadline 1, which has been updated and submitted at Deadline 5 (S_D1_9/F02) to address comments from Natural England.</p> <p>The Applicants also highlight the submission of a without prejudice benthic compensation DCO schedule at Deadline 3, which has been updated and submitted at Deadline 5 (S_D3_9/F02) to address comments from Natural England.</p>
3.1.3	<p>The MMO defers to NE for comments regarding the measure 'Planting of native oyster beds. The MMO agrees with NE's comment regarding the creation of reef is not considered to provide comparable ecological function for subtidal sand and subtidal mud systems within Fylde MCZ.</p>	<p>As outlined in the updated Commitments Register at Deadline 4 (CoT136, REP4-019), the Applicants and Natural England are in agreement that strategic compensation measures, in the form of a payment into the Marine Recovery Fund (MRF) to access Defra's programme of MPA designations/extensions, will be the preferred and best method for the delivery of MEEB for the Fylde MCZ (should MEEB be required). The project-led options would only be considered where the MRF option is not made available to the Applicants.</p>
3.1.4	<p>The MMO defers to NE for comments regarding the measure 'Subtidal seagrass bed creation'. The MMO notes Natural England's concerns about the deliverability of seagrass restoration, as there has been no long-term success with seagrass restoration in the UK. The MMO notes that the extent of the measure has not been presented which considers seagrass mortality.</p>	Please see the Applicants' response to 3.1.3 above.

Reference	IP submission	Applicants' response
3.1.5	The MMO defers to NE and Joint Nature Conservation Committee (JNCC) for comments regarding the measure 'Bivalve seeding' inside the MCZ and outside of designated sites. The MMO notes that the area which bivalves would be deployed has not yet been determined.	Please see the Applicants' response to 3.1.3 above.
3.1.6	The MMO notes that within A.1.7.3.6, the Applicants reference 'Pogoda et al., 2019', however, this reference does not appear to be listed within the reference list.	The Applicants have updated the Stage 2 MCZ Assessment, including a without prejudice, in-principle MEEB Plan at Deadline 5 to include this reference (S_D1_9/F02).
<b>4. MMO Comments on J13 Outline Fisheries Liaison and Coexistence Plan (REP3-028)</b>		
4.1.1	<b>4.1 General Comments</b> 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.	The Applicants note this comment.
4.1.2	The MMO welcomes the inclusion of 'The MMO will not act as an arbitrator or be involved in any commercial negotiations with any association, organisation and/or individual fisheries stakeholder'.	The Applicants note this comment.
4.1.3	We strongly advise that the Applicants seeks input from the Northwest Inshore Fisheries and Conservation Authority (NWIFCA) and the National Federation of Fishermen's Organisation (NFFO) in the formulation of the final fisheries liaison strategy.	The Applicants note this comment.
<b>5. MMO Comments on J22 Dredging and Disposal – Site Characterisation Plan (APP-227)</b>		
5.1.1	<b>5.1 General Comments</b>  The MMO confirm that the Applicants have provided adequate information for the designation of the disposal site area.	The Applicants welcome this comment. The Applicants would highlight that the Dredging and Disposal – Site Characterisation Plan has been updated at Deadline 5 (J22/F02) to restrict sandwave clearance methods within the Fylde MCZ to Controlled Flow Excavator.
5.1.2	Should the MMO permit a licence application for disposal of the material within the transmission assets offshore	The Applicants' note this requirement.

Reference	IP submission	Applicants' response
	order limits for the transmission assets, the Applicants should provide an appropriate shape file of the area for designation, with the exclusion of the generation assets that will be subject of an additional application/licence(s).	
5.1.3	The disposal site was designated in February 2025, and the MMO provided the disposal site in REP1-086. This disposal site code must be referenced within the DML.	<p>The Applicants thank MMO for providing the disposal site code for the Morgan and Morecambe Transmission Assets. However, as discussed during the meeting held between the Applicants and MMO on 11 September 2025 and set out in an email from the Applicants to the MMO on 25 June 2025, the Applicants request separate disposal sites (and codes) for the specific areas authorised under Schedule 14 and Schedule 15 of the draft DCO (REP4-007);</p> <ul style="list-style-type: none"> <li>• Morgan Offshore Wind Project Transmission Assets: the disposal site would be the area delineated by the co-ordinates set out in Table 5 under paragraph 5 of Schedule 14 and in Indicative Extent of Marine Licences and Grid Coordinates Plan (APP-148) / Work No. 1A, 2A, 3A and 4A in Works Plans - Onshore and Offshore - Part 1 of 2 (REP3-005).</li> <li>• Morecambe Offshore Windfarm Transmission Assets: the disposal site would be the area delineated by the co-ordinates set out in Table 7 under paragraph 5 of Schedule 15 and in Indicative Extent of Marine Licences and Grid Coordinates Plan (APP-148) / Work No. 1B, 2B, 3B and 4B in Works Plans - Onshore and Offshore - Part 1 of 2 (REP3-005)</li> </ul>
Se	<p><b>5.2 Mitigation Measures</b></p> <p>The MMO notes that seabed preparation includes UXO, sand wave, and boulder clearance. A total of 1,426,800 metres cubed (m<sup>3</sup>) of spoil arisings from sandwave clearance is required in the cable corridors to ensure adequate burial of the assets over their lifetime, of which 270,000 m<sup>3</sup> would be within the Fylde MCZ. In response to a section 42 comment from Natural England, the Applicants have reduced the requirements for sandwave clearance from 60% to 5% for Morgan export cables, and from 30% to 5% for the Morecambe export cables, and a reduction in the cable corridors from 104 m to 60 m for Morgan, and to 48 m for Morecambe.</p>	The Applicants note this comment.

Reference	IP submission	Applicants' response
5.2.2	The MMO is satisfied that the Applicants have considered alternative use and the best protocol for the use of the material to be disposed in the direct vicinity of the original location.	The Applicants note this comment. The Applicants would highlight that the Dredging and Disposal – Site Characterisation Plan has been updated at Deadline 5 (J22/F02) to restrict sandwave clearance methods within the Fylde MCZ to Controlled Flow Excavator as requested by Natural England.
5.2.3	The proposed mitigation regarding the outline bentonite breakout plan appears to be appropriate as per previous advice from the MMO.	The Applicants note this comment.
5.3.1	<b>5.3 Baseline Environment</b> Section 1.5 of the characterisation report summarises and signposts the physical characteristics including bathymetry, tidal and wave ranges, benthic subtidal and intertidal ecology, fish and shellfish ecology, marine mammals, and human environment including commercial fisheries, very well. The MMO defer to the relevant specialist advisors' and SNCBs' expertise regarding these areas and comments that they would have provided following review of the Environmental Statement (ES).	The Applicants note this comment.
5.3.2	The MMO notes that a summary of shipping and navigation and marine archaeology were also provided within this report, and we defer to the relevant specialist advisors regarding these areas and comments.	The Applicants note this comment.
5.3.3	Chemical characterisation is provided in Section 1.6.3.1. Figure 1.2 shows the location of 39 samples taken and analysed in the transmission cable corridors, and sediment samples were analysed for metals, organotins, total organic carbon, polycyclic polyaromatic hydrocarbons (PAHs) and poly chlorinated biphenyls (PCBS) by SOCOTEC, which is an MMO validated laboratory for the analyses listed.	The Applicants note this comment.
5.3.4	Levels of contaminants were appropriately compared to UK Action Levels (ALs). Most of the contaminants were below AL1, and no contaminant was observed at levels in excess of AL2. Levels of organotins were all below the limit	The Applicants note this comment.



Reference	IP submission	Applicants' response
	of detection. The report describes levels of PCB recorded in sediments at 13 out of the 39 stations sampled, the majority of which were in the nearshore area approaching landfall. However, levels of PCBs, for all samples analysed, were found to be below the sum of the ICES 7 AL1. PAH analysis showed the levels to be below the Canadian probable effect and the threshold effects levels.	
5.3.5	The sediment chemistry was signposted to Volume 2, Annex 2.1: Benthic Subtidal and intertidal ecology technical report of the ES Appendix A (APP-046), which indicates that the risk of contaminants, as a result of disturbance from the clearance and dredging works on the marine environment, is likely to be low.	The Applicants note this comment.
5.3.6	The MMO notes that all data from sampling provided in the characterisation report, for clarity and to avoid ambiguity, should also be provided in an MMO template (xlsx format only) for use with the Cefas Action Level Viewer and for use by the MMO in providing accurate annual disposal returns. In addition, this helps efficient assessment and interpretation of data without introduction of things like transcription error. This should be rectified.	The Applicants have provided the sediment data in the MMO template to the MMO via email on 16th September 2025
5.3.7	The MMO reminds the Applicants of the requirement for timely sample data to characterise the disposal area. The results had been provided from sampling in 2022, and if works have not commenced within 3-5 years of this date, depending on potential issues (other construction works, spills etc.) that may give cause to question whether the chemical characterisation remains representative of the area to be dredged or disturbed in accordance with OSPAR guidance on the management of dredged material (OSPAR Agreement 16-0e as amended 2024). The MMO may suggest additional surveys and chemical characterisation would be required prior to the commencement of construction	As per the Applicants' response to 5.3.1 to 5.3.4 above, the Applicants query how this relates to the MMO's Marine Licensing: Sediment Analysis Guidance which states that <i>"the data must also have been collected within 3 to 5 calendar years from the date you submitted your marine licence application, and we accepted it."</i> The Applicants therefore seek clarification on this point. The Applicants would highlight that no other construction works are scheduled to spatially overlap with the Transmission Assets and given the low levels of contaminants recorded in the site specific survey, significant changes from this baseline which would result in exceedances of Cefas Action Levels, prior to the commencement of construction, are considered highly unlikely. The anticipated earliest construction start date for the Transmission Assets (i.e., both Morgan Offshore Wind Project: Transmission Assets and Morecambe Offshore Windfarm: Transmission Assets) is 2027 (as set out under section 3.9 of Volume 1, Chapter 3: Project description (REP2-008)).

Reference	IP submission	Applicants' response
5.4.1	<p><b>5.4 Cumulative Impacts</b></p> <p>The MMO notes that Table 1.8 of the characterisation provides a summary of the key impacts in physical, biological, and human receptors assessed within the ES with signposting, and the impacts range from Negligible to Minor. Section 1.7.2.4 concluded that, "Based on the findings of the Stage 1 MCZ Assessment (document reference E4), it can be concluded that temporary habitat disturbance, increases in SSCs, associated deposition, and the potential remobilisation of sediment-bound contaminants, will not lead to a significant risk of hindering the achievement of the overall conservation objective of maintaining the subtidal sand and subtidal mud protected features of the Fylde MCZ." The MMO broadly agrees with this statement but defers to NE as the SNCB.</p> <p>Consideration of the likely cumulative impacts on receptors either from sequential or simultaneous construction maintenance and decommissioning of these works should be included in the report, or at a minimum, signposting to the relevant sections of the ES.</p>	<p>The Applicants have updated the Dredging and Disposal – Site Characterisation Plan at Deadline 5 (J22/F02) to include cross reference to the cumulative sections of the relevant ES chapters.</p>
<b>6. MMO Comments on updated Outline Offshore Operations and Maintenance Plan (OOOMP)</b>		
6.1.1	<p><b>6.1 General Comments</b></p> <p>The MMO was expecting an updated OOOMP to be submitted at Deadline 3, however, following conversations with the Applicants, we have been informed that this will now be provided at Deadline 4. Therefore, the MMO will keep a watching brief and may provide further comments at Deadline 5.</p> <p>The MMO has confirmed with the Applicants that the scope of artificial lighting assessment is sufficient, and we do not require any further information on this topic.</p>	<p>The Applicants note this comment and welcome further comments at Deadline 5.</p>
<b>7. MMO Comments on the Without Prejudice Benthic Compensation DCO Schedule (REP3-066)</b>		

Reference	IP submission	Applicants' response
7.1.1	<b>7.1 General Comments</b> The MMO notes that this draft is provided on a without prejudice basis. The Applicants' position is that there is no significant risk to the achievement of the conservation objectives of the Fylde MCZ, and that benthic compensation is not required. The MMO notes that NE have highlighted their disagreement with the Applicants in relation to small scale losses not hindering the conservation objectives of the MCZ.	This is noted by the Applicants.
7.1.2	The MMO questions on if this should be called compensation or if it should be Measures of Equivalent Environmental Benefit (MEEB) as it is related to a MCZ.	The Applicants have updated the drafting in the Without prejudice benthic compensation DCO schedule at Deadline 5 (document reference S_D3_9/F02) to refer to Measures of Equivalent Environmental Benefit (MEEB) to avoid any ambiguity.
7.1.3	The MMO notes that the Applicants has stated that 'Fylde MCZ' is defined as 'Fylde Marine Conservation Zone Compensation'. The MMO advises that this should be amended to 'Fylde Marine Conservation Zone'.	The Applicants have corrected this typographical error in the Without prejudice benthic compensation DCO schedule submitted at Deadline 5 (document reference S_D3_9/F02).
7.1.4	The MMO notes a typographic error in 11 (4): "Fyle MCZ".	The Applicants have corrected this typographical error in the Without prejudice benthic compensation DCO schedule submitted at Deadline 5 (document reference S_D3_9/F02).
7.1.5	In a meeting on the 21 July 2025, the Applicants noted that benthic compensation will be updated at Deadline 4 within the IPMP. Therefore, we will keep a watching brief over these additions, and we may provide further comments at Deadline 5.	This is noted by the Applicants.
7.1.6	The MMO notes that this document was discussed at Issue Specific Hearing 3 (ISH3), and we have provided comments in section 10 of this document.	This is noted by the Applicants.
<b>8. MMO comments on the Change Request – Indicative Overview Plan</b>		
8.1.1	<b>8.1 General Comments</b> The MMO notes that the Applicants has notified the Examining Authority that they intend to submit a request to	The Applicants note this comment.

Reference	IP submission	Applicants' response
	make changes to the application. The MMO has reviewed the indicative overview plan and note that the changes do not appear to relate to the marine environment. Therefore, the MMO has no comments, however, will keep a watching brief.	
<b>9. MMO comments on Issue Specific Hearing (ISH) 2</b>		
9.1.1	The MMO has reviewed 'Issue Specific Hearing 2 - Transcript' which occurred on 29 and 30 July 2025 and notes that there are no action points for the MMO.	The Applicants note this comment.
9.1.2	The MMO notes that during the hearing it was commented that both MMO and Natural England have required that the deployment of cable protection is limited to 10 years, or to limit the cable protection maximum design scenario (MDS) outside the Fylde MCZ. The MMO also notes that it was commented that both MMO and Natural England have requested no cable protection is deployed.	The Applicants have made a commitment in the updated Outline OOMP submitted at Deadline 5 (REP4-073) to limit the deployment of cable/scour protection in the operations and maintenance phase to the first ten years or limit of the MDS (whichever is first) outside the Fylde MCZ and the first two years inside the MCZ. Following these periods, any further deployment of cable protection during the operation and maintenance phase would require a new marine licence application.
9.1.3	The MMO notes that it was commented that the Applicants have now made a commitment to Natural England and the MMO that they will not be placing any cable/scour protection within the intertidal zone between mean low water springs and mean high water springs. The MMO notes that this will be submitted into examination at Deadline 4.	The Applicants updated the Commitments Register at Deadline 4 (REP4-019) to include the commitment to no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS (CoT133). The Applicants also included this commitment within the Outline Landfall Construction Method Statement submitted at Deadline 4 at the discretion of the Examining Authority (AS-081).
9.1.4	It was commented that it is Natural England's position, in addition to the MMO's, that all UXO, including 'low order', should be removed from the DCO. The MMO welcomes this and notes that this will likely be a matter for the SoS to decide on the inclusion of 'low order' UXO clearances. The MMO will provide a without prejudice position on the information within the DML and plans in relation to 'low order' UXO should the SoS decide to include 'low order' UXO clearance.	The Applicants note this comment. The Applicants note that low order UXO clearance has been retained in the recently consented Morgan Generation Assets DCO.

Reference	IP submission	Applicants' response
9.1.5	The Applicants are updating Condition 11 in the marine licences to remove reference to 'substantially', and they will also carry out a review of Schedules 14 to 17 to make sure this is updated accordingly. The MMO welcomes this and updated Schedules are expected at Deadline 4.	The Applicants confirm Condition 11 in Schedules 14 and 15 was updated in the draft Development Consent Order (REP4-007) at Deadline 4. The Applicants reviewed Schedules 14-17 and can confirm no further updates are necessary in this respect.
9.1.6	In regard to the Cable Burial Risk Assessment (CBRA) and the Outline Cable Specification and Installation Plan (CSIP), the MMO acknowledges the Applicants' statement "plowing, jetting, and cutting a suitable installation techniques for sandy and clay sediments found in shallow waters within the transmission assets order limits, a combination of burial techniques are likely to be adopted within the Outline CSIP covering all of the necessary techniques to allow for appropriate methods to be selected based on the expected sediment density and strength. Ploughing has been the predominant methodology that's been used successfully throughout our 25-year experience". The MMO will review these comments with our scientific advisors and provide further comment at Deadline 5.	The Applicants note this comment.
9.1.7	The MMO notes that's an updated OOOMP will be submitted at Deadline 4, and that the Applicant's will be asking to deploy cable protection for the first 2 years of the Operations and Maintenance phases before a new marine licence is required. This is to allow for any snagging of cable protection that should have been deployed during construction. The Applicants acknowledged that this marine licence could take up to 6 months or longer to reach determination.	Please see the Applicants' response to 9.1.2 above.
9.1.8	In the CSIP, the final design of the offshore export cable routing will be seeking to identify areas where there's greater potential to bury cables, therefore, eliminating the need for cable protection. Natural England have requested	The Applicants would highlight that the Commitments Register was updated at Deadline 4 to include this commitment: " <i>As part of the detailed design process, micro-siting of the offshore export cables within the offshore export cable corridors will be considered where successful burial could pose a challenge or where a higher risk of</i>

Reference	IP submission	Applicants' response
	this as a commitment in the commitments register. This is due to be submitted at Deadline 4.	<i>remedial works such as external cable protection may be required.</i> " (see CoT134, REP4-018).
<b>10. MMO Comments on Issue Specific Hearing (ISH) 3</b>		
10.1.1	The MMO notes that the next draft DCO (dDCO) will be updated at Deadline 4.	Please refer to REP4-007.
10.1.2	The MMO notes that during the Hearing it was noted that the MMO have confirmed that they are satisfied with the definition of maintain. The Applicants will be reviewing the wording used in the Mona Offshore Wind Project to facilitate this amendment.	The Applicants confirm that they updated the definition of 'maintain' in the draft Development Consent Order (REP4-007) at Deadline 4 to further align with the wording used in the Mona Offshore Wind Project.
10.1.3	The MMO notes that the ExA did not propose any questions at the Hearing in regard to Article 6 matters and have acknowledged that they have enough information before them to make a decision on this matter.	The Applicants note this comment.
10.1.4	The ExA noted that there are some outstanding points to address in relation to Schedules 14 – 17. The outstanding matters are in relation to transfer of benefit provisions, force majeure, and removal of all UXO clearances. The Applicants confirmed to the ExA that these matters would be subject to determination by the SoS	The Applicants note this comment.
10.1.5	The ExA highlighted that the wording 'substantially' has been removed from the requirements and confirms this should also be removed from Condition 11 (3) in Schedules 14-17 marine licences. The Applicants confirmed that this will be removed at Deadline 4.	The Applicants confirm Condition 11 in Schedules 14 and 15 was updated in the draft Development Consent Order (REP4-007) at Deadline 4. The Applicants reviewed Schedules 14-17 and can confirm no further updates are necessary in this respect.
10.1.6	The Applicants confirmed to the ExA that the Without Prejudice Benthic Compensation DCO Schedule (REP3-066) was developed as a variation on compensation measures that have been secured for other offshore windfarm projects, including Hornsea 3 (Schedule 14). The main difference between these documents is that the Marine Recovery Fund is now at a more advanced stage,	Please refer to the Applicants' response to Natural England's comments on the Without Prejudice Benthic Compensation DCO Schedule (REP4-141) (S_D3_9/F02).

Reference	IP submission	Applicants' response
	and that this is Natural England's preference for compensation. The Applicants confirmed that Natural England will provide further comments at Deadline 4.	
10.1.7	The MMO acknowledges that further ExA written questions will be submitted to us soon for clarification.	The Applicants note this comment.
<b>11. MMO comments on the Statement of Common Ground (SoCG) (REP3-049)</b>		
11.1.1	<b>11.1 General Comments</b>  The MMO had a meeting with the Applicants on 21 July 2025 to discuss the outstanding concerns regarding the SoCG.	The Applicants note this comment. An amended version of the SoCG was submitted at Deadline 4 by the Applicants (REP4-083).
11.1.2	The Applicants submitted an amended SoCG to the MMO on 31 July 2025, and the MMO provided their comments to support the Applicants Deadline 4 submission.	
11.1.3	The amended version of the SoCG will be submitted at Deadline 4 by the Applicants.	
11.1.4	The MMO notes that in ISH3, the SoS reminded interested parties that for any outstanding DCO matters not agreed, parties may wish to provide alternative drafting for the SoS to consider. The MMO will review these and aim to provide these by Deadline 6 to allow time for discussions with the Applicants.	The Applicants note this comment.
11.2.1	<b>11.2 Fish Ecology</b>  With respect to the points raised regarding fish and shellfish ecology in the SoCG, the MMO's updated comments on the remaining points to be agreed are as follows.	The Applicants note this comment.

Reference	IP submission	Applicants' response
11.2.2	Reference MMO.FSF.3: The MMO have reviewed J28.2 Marine policies tracker (APP-235) and we are satisfied the marine plan policies have been considered sufficiently.	The Applicants welcome this comment from the MMO.
11.2.3	References MMO.FSF.6, MMO.FSF.11, MMO.FSF.13: The MMO defers to NE in relation to LSE effects and AEol for SACs and should be marked as 'Not Applicable'.	The Applicants note this comment.
11.2.4	References MMO.FSF.7, MMO.FSF.8, MMO.FSF.9, MMO.FSF.10, and MMO.FSF.12 can be considered as having been agreed.	The Applicants welcome this comment from the MMO.
11.2.5	Reference MMO.FSF.14: 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.	The Applicants note this comment in relation to the cumulative assessment approach and will continue to engage with both the MMO and NE.
11.2.6	Reference MMO.FSF.15: The MMO notes that low order mitigation is proposed which is appropriate. The MMO is still reviewing the monitoring measures and will provide comments at Deadline 5.	The Applicants note this comment.
11.3.1 and 11.3.2	<b>11.3 Coastal Processes</b>  With respect to the points raised regarding Physical Processes in the SoCG, the MMO's updated comments on the remaining points to be agreed are as follows:  References MMO.PP.3, MMO.PP4a, MMO.PP8, MMO.PP.9, MMO.PP.10, MMO.PP11a, MMO.PP.12 can be considered as having been agreed.	The Applicants welcome this response and that points MMO.PP.3, MMO.PP4a, MMO.PP8, MMO.PP.9, MMO.PP.10, MMO.PP11a, MMO.PP.12 relating to coastal processes are now agreed.
11.3.3	Reference MMO.PP.4b: The MMO defers to NE in relation to HRAs.	The Applicants note this comment.



Reference	IP submission	Applicants' response
11.3.4	Reference MMO.PP.11b: The MMO requests clarification from the Applicants on beach landing depth. This is an ongoing point of discussion.	Please see the Applicants' response to 2.5.1 above.
11.3.5	Reference MMO.PP.13 refers to mitigation and monitoring and the welcome reduction in overall impacts. This comment should remain open as further detailed cable burial risk assessments are signposted by the Applicants and should be reviewed to ensure that there is no substantial negative impact on the outline proposals.	The Applicants would highlight that the detailed Cable Burial Risk Assessment is produced post-consent alongside the detailed Cable Specification and Installation Plan, both of which are conditions of the draft DCO (REP4-007) under Condition (18)(1)(e) of Schedule 14 and Schedule 15 and must be submitted to the MMO for approval prior to commencement of that stage of construction activity.. Additionally, please see the Applicants' response to 2.5.1 and 2.5.2 above.
11.4.1 and 11.4.2	<b>11.4 Benthic Ecology</b> With respect to the points raised regarding Benthic Subtidal and Intertidal Ecology in the SoCG, the MMO's updated comments on the remaining points to be agreed are as follows: References MMO.BE.3, MMO.BE.8, and MMO.BE.9 can be considered as having been agreed.	The Applicants welcome this comment and that points MMO.BE.3, MMO.BE.8, and MMO.BE.9 relating to benthic ecology are now agreed.
11.4.3	Reference MMO.BE.13: The MMO notes that it was assessed within the Environmental Impact Assessment (EIA) and the Project was found to have no significant impacts on benthic receptors, when considered alone or cumulatively. However, we will defer comment to NE on in-combination effects.	The Applicants note this comment.
11.4.4	Reference MMO.BE.14: the MMO understands 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 agrees with these mitigations and the approach taken to minimise the requirement for cable protection measures within the MCZ.	The Applicants welcome this comment.

Reference	IP submission	Applicants' response
11.4.5	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.	The Applicants updated the OIPMP at Deadline 4 (REP4-075) to include a new commitment to benthic community recovery specific monitoring in the Fylde MCZ through pre and post construction benthic community sampling to monitor for temporal and spatial recovery.
<b>12. Comments on other Stakeholder's Deadline 3 Responses</b>		
12.1.1	<p><b>12.1 Blackpool Borough Council (BBC) (REP3-076)</b></p> <p>The MMO notes that the BBC advise of revised construction working hours to 08:00–18:00 (Monday–Friday) and 08:00–13:00 (Saturday), with no works on Sundays or Bank Holidays. This is due to the current proposed times being excessive, in and close to residential areas.</p>	<p>The Applicants confirm that they updated the working hours under Requirement 14 of Schedules 2A and 2B of the draft Development Consent Order (REP4-007) at Deadline 4, as follows:</p> <ul style="list-style-type: none"> <li>Monday to Friday: 07:00 - 19:00 hours;</li> <li>Saturday: 07:00 – 13:00 hours, with no activity on Sundays or bank holidays.</li> </ul> <p>Please also see CoT18 within the Commitments Register (REP4-018).</p>
12.1.2	<p>In the Applicant's response to the Examining Authority's (ExAs) Questions 1 (REP3-056 Q16.1.1), they state:</p> <p><i>"Allocating additional resources (e.g. labour, plant and/or equipment) is not a simple solution to addressing reduced Saturday working hours, as the primary constraint is the available working time within a given day, rather than the resources available. Mobilisation and demobilisation, health and safety briefings and required breaks remain fixed daily activities required by CDM requirements and contractual agreements. These activities become disproportionately significant within a shorter working window, leading to an overall greater loss of productive on-site working time.</i></p> <p><i>Additionally, including additional plant or workforce within already constrained working areas and temporary cable corridors could lead to greater mobilisation/demobilisation</i></p>	

Reference	IP submission	Applicants' response
	<i>periods, increased congestion and logistical challenges, potentially offsetting any potential gains. The Applicants maintain that Saturday afternoon working enables more efficient and timely completion of works at each specific location, thereby minimising disruption to local communities and landowners over the total programme duration of construction."</i>	
12.1.3	The MMO deems this an ongoing discussion which has been raised by other Interested Parties (Fylde Council (REP3-082), and South Ribble Borough Council (REP3-109)) also. We will keep a watching brief over this issue in relation to the intertidal and believes that for offshore works this is 24/7.	
12.2.1	<p><b>12.2 Environmental Agency (EA) (REP3-079 &amp; REP3-081)</b></p> <p>In the EA's Deadline 3 submission (REP3-079), the MMO notes that for Requirement 12 – Ecological Management Plan, the EA are not satisfied with the revised wording, 12. (1) (b) "the Environment Agency where works have the potential to impact wetland habitats". The EA requested that they are listed as an unqualified consultee for the Ecological Management Plan.</p>	The Applicants confirm that they updated the timescales at Schedule 12 of the draft Development Consent Order (REP4-007) at Deadline 4. The Environment Agency confirmed they see this matter is now closed (see REP4-132).
12.2.2	The MMO notes that with regards to the sand dunes habitat, the EA's interest lies specifically with the groundwater, and the groundwater dependant terrestrial habitat it supports. EA is satisfied that the detailed design of the trenchless crossing will be informed by a hydrogeological risk assessment (HyRA), secured by Requirement 8. EA awaits the submission of the outline HRA for review.	The Applicants can confirm that the Environment Agency has provided comments on the Outline Hydrogeological Risk Assessment, and a meeting was held on Wednesday 17 <sup>th</sup> September regarding this matter. Subsequently, the Outline Hydrogeological Risk Assessment (S_D3_6/F02) has been updated and submitted at Deadline 5.
12.2.3	Regarding contamination, remediation and mitigation, the EA notes that any as-yet unidentified contamination would require characterisation and the development of a management strategy. Without knowing the detail of that	The Applicants note the comment. Section 1.11.3.18 of Volume 3, Chapter 1: Geology, hydrogeology and ground conditions (APP-068), states that appropriate further studies (e.g., site investigations) are proposed to be undertaken where major trenchless

Reference	IP submission	Applicants' response
	<p>strategy, EA can't at this stage be certain that it can be controlled in full within the order limits. However, the following considerations regarding the nature of the development provide confidence that remediation would be possible within the Order limits:</p> <ul style="list-style-type: none"> <li>• Depth of excavation, and number and size of related infrastructure means the overall volumes of excavated material are likely to be comparatively low.</li> <li>• The linear nature of the development means there wouldn't necessarily be an expectation to fully remediate the full extent of any contamination that extends beyond the footprint of the development. The focus would more likely be on providing local remediation and preventing the infrastructure acting as a migration pathway for the contamination.</li> </ul>	<p>crossings are proposed, during the detailed design stage to confirm ground conditions (CoT94), which could include the landfall area where necessary.</p> <p>An Outline Contaminated Land and Groundwater Discovery Strategy has been submitted with the application for development consent (REP4-052), to identify any suspected areas of contamination and any remedial measures which may be required. Detailed strategies will identify the construction protocol for discovery of any currently unknown contamination and any remedial measures that may be required.</p>
12.2.4	The MMO will keep a watching brief over matters of contamination and the updated Ecological Management Plan and may provide further comments at future deadlines.	The Applicants note this comment.
12.3.1 and 12.3.2	<p><b>12.3 Maritime and Coastguard Agency (MCA) (REP3-086)</b></p> <p>The MMO notes that regarding cable laying burial surveys, MCA is satisfied with the Applicant's response in REP2-031 that the requirements for post-construction bathymetry surveys and monitoring are secured in the DCO conditions. The MMO has no further comments on these matters.</p>	The Applicants welcome this comment from the MMO.
12.4.1	<p><b>12.4 Natural England (NE) (REP3-090 – 092)</b></p> <p>The MMO notes that in the Applicants response, the Applicants have noted that they are currently engaging with NE are committed to providing sufficient information to satisfy that there will be no adverse effect on site integrity</p>	The Applicants note this comment.

Reference	IP submission	Applicants' response
	for the Ribble and Alt Estuaries SPA/Ramsar terrestrial waterbirds.	
12.4.2	The MMO notes that in the Applicants' Response to ExAs Written Questions (ExQ1) (REP3-056), it states that the Applicants and NE have agreed to meet on 22 July 2025 to discuss outstanding offshore matters between the parties. The 22 July 2025 has been targeted to allow for the parties to review submissions made at Deadline 3, but with sufficient time to allow for provision of updates to the ExA at any relevant issue specific hearings in week commencing 28 July 2025 and for submissions at Deadline 4. Therefore, the MMO will keep a watching brief over these developments and may provide further updates at Deadline 5.	The Applicants note this comment.
12.4.3	The MMO notes that NE have advised that reef creation/enhancement is not considered to provide comparable ecological function and is therefore not an appropriate measure for subtidal sand and subtidal mud systems within Fylde MCZ.	As outlined in the updated Commitments Register at Deadline 4 (CoT136, REP4-019), the Applicants and Natural England are in agreement that strategic compensation measures, in the form of a payment into the Marine Recovery Fund (MRF) to access Defra's programme of MPA designations/extensions, will be the preferred and best method for the delivery of MEEB for the Fylde MCZ (should MEEB be required). The project-led options would only be considered where the MRF option is not made available to the Applicants.
12.4.4	The MMO notes that it remains unclear what additionally the measure for bivalve seeding inside Fylde MCZ would provide and therefore, NE has questions this as being compensation for lasting habitat/loss change to subtidal sand and subtidal mud. NE has highlighted that bivalves are associated with biogenic reef communities on mixed sediment and not subtidal sand and subtidal mud.	Please see the Applicants' response to 12.4.3 above.
12.4.5	The MMO notes that NE does not consider the bivalve seeding outside of designated sites as viable within the projects' timeframe.	Please see the Applicants' response to 12.4.3 above.
12.4.6	The MMO notes that NE have noted with regards to the measure for seagrass habitat creation/restoration concerns	Please see the Applicants' response to 12.4.3 above.

Reference	IP submission	Applicants' response
	towards the deliverability as there have been no longterm successes with seagrass restoration in the UK. NE highlight that long term implementation and success/ability to provide additionality is yet to be considered in detail and agreed with the SNCBs.	
12.5.1	<p><b>12.5 The Corporation of Trinity House of Deptford Strond (TH) (REP3-111)</b></p> <p>Regarding 'Arbitration', TH previously requested that the wording be amended to reflect the 'Savings Provisions for Trinity House' clause, plus an amendment to the wording for Schedule 14, Part 2, and Schedule 15, Part 2 Condition 14 (18(b)) and Condition 15 (see REP1-209). TH has now confirmed that they are content with the amendments made by the Applicants to the dDCO, and that the amendments made accurately reflect their written representation.</p>	The Applicants welcome this comment from the MMO.

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## 3 References