



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

**Marine Management Organisation Statement of Common Ground F04**



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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 is a joint venture between Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd.
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 is a joint venture between bp Alternative Energy Investments Ltd. and Energie Baden-Württemberg AG (EnBW).
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects.

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## 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

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# **1 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 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).

1.1.1.3 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)

- Development Consent Order and deemed Marine Licences
- 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 and 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:



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- 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 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.

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## 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 22 October 2025 (Deadline 6).

### 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	All matters <b>agreed</b>
Benthic Subtidal and Intertidal Ecology	All matters <b>agreed</b>
Fish and Shellfish Ecology	All matters <b>agreed</b>
DCO and deemed Marine Licences	Some matters <b>not agreed</b> (inclusion of UXO clearance, inclusion of MMO and dMLs in 'transfer of benefit of the order', drafting of 'force majeure' and non-inclusion of 'adaptive management'), one matter <b>not agreed, but not material</b> (non-inclusion of CoT133 'no cable protection in intertidal' from dMLs), with remaining provisions in draft DCO and dMLs relevant to the MMO <b>agreed</b> .
Other Documents and Plans	All matters <b>agreed</b>

## 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 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>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<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> <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> </ul>

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
			<ul style="list-style-type: none"> <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> <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.
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
11 September 2025	Online meeting	Non-statutory	A meeting to discuss MMO deadline 4 submission, new commitments made by the Applicants and outstanding matters ahead of deadline 5.
02 October 2025	Online meeting	Non-statutory	A meeting to discuss MMO deadline 5 submission, new commitments made by the Applicants and outstanding matters ahead of deadline 6.
13 October 2025	Online meeting	Non-statutory	Finalisation of the SoCG for submission at Deadline 6.
20 October 2025	Online meeting	Non-statutory	Finalisation of the SoCG for submission at Deadline 6.

## 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

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agreed or not agreed, but not material, 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.
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 1.9 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 has 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> <p><u>Deadline 6 Update</u></p> <p>The MMO confirms the status is agreed.</p>	Agreed
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.	<p>The MMO is largely content with the baseline environment, noting NE and EA have concerns in relation to information near landfall.</p> <p><u>Deadline 6 Update</u></p> <p>No further update within Deadline 5 representation. The MMO confirms the status is agreed.</p>	Agreed



Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.PP.4b	Baseline environment	The Applicants have adequately characterised the baseline environment for Physical processes. The baseline is appropriate for the purpose of the HRA.	The MMO will defer to NE as the competent authorities for HRA's.	N/A
MMO.PP.5	Scoping	Agreement to the scoping of impacts for the EIA for Physical processes.	Ascertained from the receipt 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 deems 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 deems these comments to be resolved.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
MMO.PP.10a	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 <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 deems these comments to be resolved.</p>	Agreed
MMO.PP.10b	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.11a	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.11b	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 mean low water springs (MLWS) and mean high water springs (MHWS) will be buried to a target depth of 3 m. In	<p>The MMO request clarification from the Applicants on beach landing depth.</p> <p><u>Deadline 6 Update</u></p> <p>The Applicant has provided further information (due to be submitted at Deadline 6) and while the information does not necessarily answer</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
		<p>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.</p> <p><u>Deadline 6 update</u></p> <p>The Applicants have responded at Deadline 6 to the latest MMO position in the Applicants' response to the MMO submission at Deadline 5, which the Applicants shared with the MMO (by email on 14 October 2025) to allow for resolution of this matter, as set out under the MMO's 'Deadline 6' position for this agreement statement.</p>	<p>every possible question, and the potential remains for the stable, and in sections accretionary, beach levels of the recent past to revert to a stated previous erosional behaviour, the assessment indicates that this is:</p> <p>(i) reasonably unlikely in the near term, and</p> <p>(ii) not necessarily something that will be exacerbated by the resulting changes in cable burial.</p> <p>Further information linked to the Shoreline Management Plan can be found in our Deadline 6 response.</p> <p>The MMO believes that the further information provided is sufficient to justify the current proposals and that the Cable Burial Risk Assessment (CBRA) is reasonable and takes a balanced approach to the risk of coastal change.</p> <p>The MMO confirms that this status is now agreed.</p>	
MMO.PP.12	Assessment of the effects from the Transmission Assets cumulatively with other projects	<p>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>	<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> <p><u>Deadline 6 Update</u></p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			The MMO confirms the status is agreed.	
MMO.PP.13	Mitigation and monitoring	<p>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.</p> <p><u>Deadline 6 update:</u></p> <ul style="list-style-type: none"> <li>• Sandwave monitoring - As stated by the Applicants during Issue Specific Hearing 4, a commitment to pre and post-construction sandwave monitoring has been made through the updated Offshore IPMP submitted at Deadline 6.</li> <li>• Intertidal cable exposure / shoreline retreat - The Applicants have responded at Deadline 6 to the latest MMO position in the Applicants' response to the MMO submission at Deadline 5, which the Applicants shared with the MMO (by email on 14 October 2025) to allow for resolution of this matter, as set out under the MMO's 'Deadline 6' position for this agreement statement (as per MMO.PP.11b above).</li> </ul>	<p>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).</p> <p><u>Deadline 4 Update</u></p> <p>The MMO is continuing discussions with the Applicant in relation to cable burial risk assessments.</p> <p><u>Deadline 5 update</u></p> <p>The MMO reviewed clarifications received by the Applicants regarding cable exposure to shoreline retreat at the landfall location.</p> <p>The MMO notes that further spatial and temporal analysis is required.</p> <p>If the Applicants cannot demonstrate a long-term large-scale accretionary trend, the MMO deems it reasonable to consider the impact of the cable exposure if the shoreline was to retreat.</p> <p><u>Deadline 6 Update</u></p> <p>See MMO comments in MMO.PP.11b above. The MMO confirms this status is now agreed.</p>	Agreed

### 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 has reviewed J28.2 Marine policies tracker (APP-235) and we are satisfied the marine plan policies have been considered sufficiently. Therefore, the MMO is happy to amend this point to Agreed.</p> <p><u>Deadline 6 Update</u></p> <p>The MMO confirms the status is agreed.</p>	Agreed
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 is content that there will be no significant effects on Benthic subtidal and intertidal ecology for the impacts on Benthic subtidal and intertidal ecology for the impacts from the Transmission Assets alone.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
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).	N/A
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)	N/A
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 AEoI for SACs.	N/A
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> <p><u>Deadline 6 Update</u></p> <p>The MMO notes that with regards to benthic subtidal and intertidal ecology the Applicants have concluded that all residual effects are deemed to</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			be minor adverse or lower significance. The MMO is satisfied with these conclusions. The MMO confirms the status is agreed	
MMO.BE.14	Mitigation and monitoring	<p>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> <p><u>Deadline 6 Update</u></p> <p>The Applicants updated the Offshore IPMP submitted at Deadline 4 to include for pre and post-construction monitoring of benthic community recovery and INNS monitoring.</p>	<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 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.</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> <p><u>Deadline 6 Update</u></p> <p>The MMO welcomes the inclusion of the 'Pre-construction' phase and INNS in the monitoring plan, alongside further amendments to some wording for clarity purposes.</p>	Agreed



Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<p>The MMO also notes adaptive management has been included within the document.</p> <p>The MMO is content with the benthic aspect of the IPMP, notwithstanding comments in line MMO.DCO.5 of this document.</p>	

## 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> <p><u>Deadline 6 Update</u></p> <p>The MMO confirms the status is agreed.</p>	Agreed
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
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

Reference Number	Discussion point	Applicants' position	MMO' position	Status
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.	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. <u>Deadline 4 Update</u> The MMO is content that the receptors have been correctly identified and described within the EIA.	Agreed
MMO.FSF.8	Assessment methodology	The approach to underwater sound impacts from UXO clearance is appropriate.	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. <u>Deadline 4 update</u> 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. On a 'without prejudice' basis the MMO is content that additional mitigation for this impact is not required.	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<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>	
MMO.FSF.9	Baseline environment	The Applicants have adequately characterised the baseline environment for Fish and Shellfish ecology.	<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>The MMO is content with the baseline environment characterisation.</p>	Agreed
MMO.FSF.10	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>The MMO is content with the projects screened into the CEA.</p>	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 AEoI 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)..	<p>The MMO is reviewing the information provided at Procedural Deadline A. Comments to be provided at Deadline 3.</p> <p>The MMO agrees there is no significant effects on fish and shellfish ecology alone.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			The MMO's position is that UXO clearance should not be within the DML. Please see MMO.DCO.2 for further comments.	
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> <p><u>Deadline 6 Update</u></p> <p>The MMO notes updated documents were submitted at Deadline 5 including updates to the CEA review to include new temporal and project data that could influence noise-related cumulative effects.</p> <p>The MMO acknowledges that the updates do not escalate cumulative effects beyond the original "<i>minor adverse</i>" or "<i>negligible</i>" significance levels.</p> <p>The MMO is content from a noise point of view.</p> <p>The MMO understands that NE is largely content with in combination impacts from a noise point of</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			view and are concerned with impacts from UXO and EMF on a supporting habitat of Marine Protected Areas – sandeel and herring. Therefore, the MMO defers to NE on the remaining impacts identified.	
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> <p><u>Deadline 6 Update</u></p> <p>To facilitate a conclusion to SoCG reference MMO.FSF.15, the MMO has reviewed Volume 2, Chapter 3: Fish and shellfish ecology (APP-048). The MMO notes that monitoring of fish receptors or fish habitats is not proposed for the Transmission Assets scheme due to the residual significance of effect for all impacts being either minor adverse or negligible. The MMO is content with this decision.</p> <p>The MMO confirms that the Applicant's assertion to not include monitoring of fish receptors or fish habitats due to impacts being either minor adverse or negligible is acceptable.</p> <p>The MMO confirms the status is agreed.</p>	Agreed

## 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) and other matters set out in the subsequent agreement rows below, 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. <u>Deadline 6 Update</u> Notwithstanding the comments in lines MMO.DCO.2-5 below the MMO is content with the wording within Schedule 14, 15, 16 and 17 of the DCO.	Agreed
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 clearance techniques only). <u>Deadline 6 update</u> The Applicants have updated Condition 20(2) in Schedule 14 and 15 of the draft DCO at Deadline 6 to specify a '6-month' minimum period for issuing UXO pre-commencement documents to the MMO unless otherwise agreed with the MMO.	The MMO welcomes the commitment to low order UXO clearance only and will review the updated documents. 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. <u>Deadline 4 update</u> 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. The MMO does not agree with the inclusion of UXO clearance within the DCO/DML. On a without prejudice basis, should the Secretary of State include low order UXO the MMO is satisfied	Not agreed <i>(but note that the MMO 'without prejudice' position is that should Secretary of State include low order UXO clearance, the provisions in the DML will allow for management of low order UXO clearance)</i>

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<p>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> <p><u>Deadline 6 Update</u></p> <p>The MMO provided further comments on the inclusion of UXO within the DCO in our Deadline 5 response (REP5-175).</p> <p>This position has not changed.</p> <p>The MMO and the Applicant discussed Condition 20 (2) and agreed that the wording '(excluding the information required under sub-paragraphs (1)(a)(ii) and (1)(a)(iii))' should be removed, in addition to this Condition 20(3) will also be removed.</p> <p>Upon final review of the conditions the MMO has noted that the submission timescale in Condition 20(2) is three months – the MMO believe this should be six months as this will coincide with Morgan and the rest of the DML. This can also include '<i>unless otherwise agreed in writing with the MMO</i>' should suitable justification be provided at the time of submission. The MMO Notes the Applicant will be updating this condition at Deadline 6 and has no outstanding concerns on the condition wording.</p> <p>The MMO also notes that there were still outstanding concerns in relation to the cumulative effects assessment from Natural England on the marine mammal population levels. The MMO notes the Applicant and NE will be submitting an 'not agreed but not material' position at Deadline 6. The MMO has generally deferred to NE on this matter but would like to review any potential changes to the condition wording based on this assessment of how in combination impacts could be managed post</p>	



Reference Number	Discussion point	Applicants' position	MMO' position	Status
			consent should the Secretary of State include low order UXO clearance.	
MMO.DCO.3	Schedule 1 Part 2 Article 6 Benefit of the Order	<p>The inclusion of Article 6 Benefit of the Order in Schedule 1, Part 2 of the draft DCO is appropriate.</p> <p><u>Deadline 6 update</u></p> <p>The draft DCO was updates at Deadline 5 to adopt the drafting included in the Morgan Generation Assets made Order, which includes revisions made by Secretary of State.</p>	<p>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.</p> <p><u>Deadline 5 Update</u></p> <p>The MMO is still reviewing the Morgan decision and the impacts to the position on this matter and will discuss this with the Applicants at the earliest opportunity and provide an update as an additional submission (if accepted by the ExA) or at Deadline</p> <p>The MMO notes that following a meeting with the Applicants on 11 September 2025, they informed us that they will be maintaining their position on this matter.</p> <p><u>Deadline 6 Update</u></p> <p>The MMO notes that the Draft DCO was updated at Deadline 5 to adopt the drafting included within the Morgan Generation Assets made Order, which includes revisions made by the Secretary of State (SoS). In a meeting on 11 September 2025, the MMO informed the Applicants they we will be maintaining our position on this matter, we welcome the updates made but still disagree with the inclusion of the DMLs.</p>	Not agreed
MMO.DCO.4	Schedules 14 & 15 Part 2 Condition 17 - Force Majeure / Schedules 16 & 17 Part 2	<p>The drafting for the 'force majeure' condition is appropriate.</p> <p><u>Deadline 6 update:</u></p> <p>The draft DCO was updates at Deadline 5 to adopt the drafting</p>	<p>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.</p>	Not agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
	Condition 15 – Force Majeure	included in the Morgan Generation Assets made Order, which includes revisions made by Secretary of State.	<p>It could cover anything, including causes which are entirely within the master's control such as negligence matters.</p> <p><u>Deadline 6 Update</u></p> <p>The MMO welcomes the Applicants adopting the wording included in the Morgan Generation Assets made Order.</p> <p>The MMO has provided further comments within our Deadline 6 response and provided an update to the Applicant in a meeting on 20 October 2025. The MMO is still of the opinion that the appropriate wording ought to be the same as that set out in MCAA as this would alleviate confusion and a potential for a two-tier test approach or removed completely.</p>	
MMO.DCO.5	Schedules 14 & 15 Part 2 Condition 26 – Post-construction Monitoring	The inclusion of adaptive management as a condition within Condition 26 (post-construction monitoring) of Schedule 14 and 15 is not necessary as it is adequately secured in the Outline IPMP, which is secured under Condition 18(1)(d) of Schedule 14 and 15 which requires approval of a Monitoring Plan in accordance with the Outline IPMP before licenced activities can commence.	<p>The MMO agrees that the outline IPMP is secured within the DML. However, notes 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> <p>The MMO provided more detailed comments within Deadline 5 (REP5-175). 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).</p> <p>For any impacts related directly to Marine Protected Areas the MMO believes a condition should be on the face of the DML and not within a plan. The MMO notes that the Applicants have included the requirement for an adaptive management plan</p>	Not agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			within the IPMP but still believes that a standalone condition should be included. The MMO notes this is for the SoS to decide on if the condition should be included.	
MMO.DCO.6	Schedules 14 & 15 Part 2, Conditions	Commitment CoT133 " <i>No cable/scour protection shall be permanently deployed in the intertidal area between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS)</i> " is secured within the Outline Offshore Cable Specification and Installation Plan and in the Outline Landfall Construction Method Statement, both of which are secured in the draft DCO through Condition 18(1)(e) of Schedules 14 and 15 and Requirement 8(2)(q) of Schedules 2A and 2B respectively. Inclusion of CoT133 within the draft DCO is not necessary.	The MMO believes that the Commitment CoT133 should be secured on the face of the DML. However, the MMO believes this is for the SoS to decide and if on this occasion does not believe this is a material impact but would be a benefit to all parties/contractors during the post consent stage as all could see the clear commitment outside of a plan.	Not agreed, but not material

## 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><u>Deadline 6 update</u></p> <p>The Outline MMMP was updated at Deadline 4 to address comments from the MMO including reference to seals and relevant legislation.</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> <p><u>Deadline 6 Update</u></p> <p>The MMO welcomes the inclusion of seals and the associated legislation within the Outline MMMP document.</p> <p>The MMO notes that in Section 1.6.6, the Applicants have stated that with regards to the UXO post-clearance search, the approach to communication will be reviewed and finalised post-consent and will be set out in the final MMMP(s). The MMO is in agreement with this approach.</p> <p><u>Underwater Noise</u></p> <p>The MMO notes that the amendments to the MMMP appear to be minor only. Therefore, we have no further comments on underwater noise impacts currently.</p> <p>The MMO is content with the oMMMP.</p>	Agreed
<b>Offshore In Principle Monitoring Plan</b>				
MMO.OP.2	oIPMP	<p>The Offshore IPMP is appropriate.</p> <p><u>Deadline 3 update</u></p>	<p>The MMO is reviewing this document and will provide comments at Deadline 1.</p>	Agreed ( <i>notwithstanding the MMO's</i> )

Reference Number	Discussion point	Applicants' position	MMO' position	Status
		<p>An updated Offshore IPMP was submitted at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The Offshore IPMP was updated for Deadline 4 to capture the Applicants new commitment to pre and post construction benthic monitoring within the Fylde MCZ.</p> <p><u>Deadline 5 update</u></p> <p>The Offshore IPMP was updated at Deadline 5 to secure Adaptive Management.</p> <p><u>Deadline 6 update</u></p> <p>An updated Offshore IPMP was submitted at Deadline 6 to include pre and post-construction sandwave monitoring (as committed to by the Applicants during Issue Specific Hearing 4).</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> <p><u>Deadline 6 Update</u></p> <p>The MMO has reviewed the updated plan and is content with the information within the IPMP, notwithstanding the MMO's position on inclusion of adaptive management in the draft DCO (line MMO.DCO.5).</p> <p>The MMO notes the Applicant will be updating the IPMP at Deadline 6 and believes that this will not change our position.</p>	<i>position in line MMO.DCO.5)</i>
<b>Outline Offshore Operations and Maintenance Plan</b>				
MMO.OP.3	oOOMP	<p>The Outline Offshore O&amp;M Plan is appropriate.</p> <p><u>Deadline 3 update</u></p> <p>An updated Outline O&amp;M Plan will be submitted at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The Outline Offshore O&amp;M Plan was not submitted at Deadline 3 due to the Applicant clarifying update requirements with the MMO and was submitted at Deadline 4.</p> <p><u>Deadline 6 update</u></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> <p><u>Deadline 6</u></p> <p><i>Benthic Ecology</i></p> <p>The MMO notes that the amendments to the document pertaining to benthic ecological interests are appropriate.</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
		Regarding CoT135 ( <i>"The Applicants will not plan routine O&amp;M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances"</i> ), an updated Outline OOMP will be submitted at Deadline 6 to define 'urgent circumstances' as cable exposure / cable failure.	<p><i>Fish and shellfish ecology</i></p> <p>The MMO has no comments or concerns regarding the updates to licence condition 11 parts 4, 5, 6, 7(a), &amp;7(b), and the amendments to the Transmission Assets operation and maintenance activities outlined in Table 1.1. The MMO notes and welcomes the additional commitments of relevance to fish ecology, namely CoT47 CoT71, and CoT133.</p> <p><i>Deadline 6 Update</i></p> <p>The MMO is content with the OOMP in principle, <u>on the understanding</u> that the Applicants will update CoT135 within the final Outline OOMP at Deadline 6.</p> <p>The MMO discussed this commitment further with the Applicants on 13 October 2025 and on this occasion only, we are content to secure the relevant provision within the Outline OOMP rather than on the face of the DML, given that NE has not requested its inclusion in the DMLs.</p> <p>The MMO confirms this status is now agreed.</p>	
<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</p>	Agreed

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<p>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> <p><u>Deadline 6 Update</u></p> <p>The MMO is content with the plan submitted at Deadline 3 and does not believe there are outstanding comments by interested parties raised, therefore confirms the status is agreed.</p>	
<b>Outline Offshore Cable Specification and Installation Plan and Outline Cable Burial Risk Assessment</b>				
MMO.OP.5	oCSIP	<p>The Outline Offshore CSIP is appropriate.</p> <p>23 June 2025: An updated oCSIP was submitted at Deadline 2.</p> <p><u>Deadline 6 update</u></p> <p>The Outline Offshore CSIP was updated at Deadline 5 to clarify that within the Fylde MCZ sandwave clearance may only be undertaken by Controlled Flow Excavator.</p>	<p>The MMO is reviewing this document and will provide comments at Deadline 1.</p> <p>23 June 2025: The MMO will provide comments at Deadline 3.</p> <p><u>Deadline 4 update</u></p> <p>The MMO is content with the document from a fisheries review.</p> <p>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.</p> <p><u>Deadline 6 Update</u></p> <p>The MMO notes in CoT133, the Applicants have stated that no cable/scour protection shall be permanently deployed in the intertidal area between MLWS and MHWS. This will be updated within the Outline Offshore Cable Specification and Installation Plan (CSIP). The MMO believes the information within the CSIP will be acceptable.</p>	<p>Agreed (<i>notwithstanding the MMO position set out in MMO.DCO.6</i>)</p>

Reference Number	Discussion point	Applicants' position	MMO' position	Status
			<p>The MMO believes it would be beneficial if this commitment was clear on the face of the DML as a condition. Further comments can be found in our Deadline 6 response and in line MMO.DCO.6.</p> <p>The MMO notes that the Outline CBRA underpins the Outline CSIP and the Physical Processes ES Chapter (REP5-030). The CBRA was developed to facilitate interpretations within the Physical Processes ES chapter.</p> <p>The MMO is therefore satisfied that there are no outstanding comments on the structure of the CBRA, and we understand that this will be submitted alongside the final CSIP and offshore Construction Method Statement (CMS) at post-consent.</p> <p>The MMO confirms this status is now agreed.</p>	