



MORGAN AND MORECAMBE OFFSHORE WIND FARMS: TRANSMISSION ASSETS

Annex 2.5 to Applicants' Response to Deadline 5 submissions from Statutory Consultees and other organisation: Marine Management Organisation



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Glossary

Term	Meaning
400 kV grid connection cables	Cables that will connect the proposed onshore substations to the existing National Grid Penwortham substation.
400 kV grid connection cable corridor	The corridor within which the 400 kV grid connection cables will be located.
Applicants	Morgan Offshore Wind Limited (Morgan OWL) and Morecambe Offshore Windfarm Ltd (Morecambe OWL).
Biodiversity benefit	<p>An approach to development that leaves biodiversity in a better state than before. Where a development has an impact on biodiversity, developers are encouraged to provide an increase in appropriate natural habitat and ecological features over and above that being affected.</p> <p>For the Transmission Assets, biodiversity benefit will be delivered within identified biodiversity benefit areas within the Onshore Order Limits. Further qualitative benefits to biodiversity are proposed via potential collaboration with stakeholders and local groups, contributing to existing plans and programmes, both within and outside the Order Limits.</p>
Code of Construction Practice	A document detailing the overarching principles of construction, contractor protocols, construction-related environmental management measures, pollution prevention measures, the selection of appropriate construction techniques and monitoring processes.
Commitment	This term is used interchangeably with mitigation and enhancement measures. The purpose of commitments is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects. Primary and tertiary commitments are taken into account and embedded within the assessment set out in the ES.
Construction Traffic Management Plan	A document detailing the construction traffic routes for heavy goods vehicles and personnel travel, protocols for delivery of Abnormal Indivisible Loads to site, measures for road cleaning and sustainable site travel measures.
Design envelope	A description of the range of possible elements and parameters that make up the Transmission Assets options under consideration, as set out in detail in Volume 1, Chapter 3: Project Description. This envelope is used to define the Transmission Assets for EIA purposes when the exact engineering parameters are not yet known. This is also referred to as the Maximum Design Scenario or Rochdale Envelope approach.
Development Consent Order	An order made under the Planning Act 2008, as amended, granting development consent.
Direct pipe	A cable installation technique which involves the use of a mini (or micro) tunnel boring machine and a hydraulic (or other) thruster rig to directly install a steel pipe between two points.
Environmental Impact Assessment	The process of identifying and assessing the significant effects likely to arise from a project. This requires consideration of the likely changes to the environment, where these arise as a consequence of a project, through comparison with the existing and projected future baseline conditions.

Term	Meaning
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process.
Evidence Plan Process	A voluntary consultation process with specialist stakeholders to agree the approach to, and information to support, the EIA and Habitats Regulations Assessment processes for certain topics.
Generation Assets	The generation assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm include the offshore wind turbines, inter-array cables, offshore substation platforms and platform link (interconnector) cables to connect offshore substations.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Intertidal Infrastructure Area	The temporary and permanent areas between MLWS and MHWS.
Landfall	The area in which the offshore export cables make landfall (come on shore) and the transitional area between the offshore cabling and the onshore cabling. This term applies to the entire landfall area at Lytham St. Annes between Mean Low Water Springs and the transition joint bay inclusive of all construction works, including the offshore and onshore cable routes, intertidal working area and landfall compound(s).
Local Authority	A body empowered by law to exercise various statutory functions for a particular area of the United Kingdom. This includes County Councils, District Councils and County Borough Councils.
Local Highway Authority	A body responsible for the public highways in a particular area of England and Wales, as defined in the Highways Act 1980.
Main rivers	The term used to describe a watercourse designated as a Main River under the Water Resources Act 1991 and shown on the Main River Map. These are usually larger rivers or streams and are managed by the Environment Agency.
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
Maximum design scenario	The realistic worst case scenario, selected on a topic-specific and impact specific basis, from a range of potential parameters for the Transmission Assets.
Mean High Water Springs	The height of mean high water during spring tides in a year.
Mean Low Water Springs	The height of mean low water during spring tides in a year.
Micro-tunnel / micro-tunnelling	A tunnelling technique involving the use of a hydraulic (or other) jacking rig and a mini (or micro) tunnel boring machine to install a concrete tunnel between two points.
Mitigation measures	This term is used interchangeably with Commitments. The purpose of such measures is to avoid, prevent, reduce or, if possible, offset significant adverse environmental effects.
Morecambe Offshore Windfarm: Generation Assets	The offshore generation assets and associated activities for the Morecambe Offshore Windfarm.

Term	Meaning
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 Limited is owned by Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	<p>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.</p> <p>Also referred to in this report as the Transmission Assets, for ease of reading.</p>
Morgan Offshore Wind Project: Generation Assets	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 JERA Nex bp (JNbp) and Energie Baden-Württemberg AG (EnBW).
National Grid Penwortham substation	The existing National Grid substation at Penwortham, Lancashire.
National Policy Statement(s)	The current national policy statements published by the Department for Energy and Net Zero in 2023 and adopted in 2024.
Offshore booster station	A fixed structure located along the offshore export cable route, containing electrical equipment to ensure bulk wind farm capacity can be fully transmitted to the onshore substations.
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the Generation Assets to the landfall.
Offshore export cable corridor	The corridor within which the offshore export cables will be located.
Offshore Permanent Infrastructure Area	The area within the Transmission Assets Offshore Order Limits (up to MLWS) where the permanent offshore electrical infrastructure (i.e. offshore export cables) will be located.
Offshore Order Limits	See Transmission Assets Order Limits: Offshore (below).
Offshore substation platform(s)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Onshore export cables	The cables which would bring electricity from the landfall to the onshore substations.
Onshore export cable corridor	The corridor within which the onshore export cables will be located.
Onshore Infrastructure Area	The area within the Transmission Assets Order Limits landward of MHWS. Comprising the offshore export cable corridor from MHWS to

Term	Meaning
	the transition joint bay, onshore export cable corridor, onshore substations and 400 kV grid connection cable corridor, and associated temporary and permanent infrastructure including temporary and permanent compound areas and accesses. Those parts of the Transmission Assets Order Limits proposed only for ecological mitigation and/or biodiversity benefit are excluded from this area.
Onshore Order Limits	See Transmission Assets Order Limits: Onshore (below).
Onshore substations	The onshore substations will include a substation for the Morgan Offshore Wind Project: Transmission Assets and a substation for the Morecambe Offshore Windfarm: Transmission Assets. These will each comprise a compound containing the electrical components for transforming the power supplied from the generation assets to 400 kV and to adjust the power quality and power factor, as required to meet the UK Grid Code for supply to the National Grid.
Preliminary Environmental Information Report	A report that provides preliminary environmental information in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. This is information that enables consultees to understand the likely significant environmental effects of a project, and which helps to inform consultation responses.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations due to the flow of water.
Substation	Part of an electrical transmission and distribution system. Substations transform voltage from high to low, or the reverse by means of electrical transformers.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Transmission Assets.
Transmission Assets	See Morgan and Morecambe Offshore Wind Farms: Transmission Assets (above).
Transmission Assets Order Limits	The area within which all components of the Transmission Assets will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).
Transmission Assets Order Limits: Offshore	<p>The area within which all components of the Transmission Assets seaward of Mean Low Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning.</p> <p>Also referred to in this report as the Offshore Order Limits, for ease of reading.</p>
Transmission Assets Order Limits: Onshore	<p>The area within which all components of the Transmission Assets landward of Mean High Water Springs will be located, including areas required on a temporary basis during construction and/or decommissioning (such as construction compounds).</p> <p>Also referred to in this report as the Onshore Order Limits, for ease of reading.</p>

Acronyms

Acronym	Meaning
AIS	Air Insulated Switchgear
AOD	Above Ordnance Datum
BCA	Bilateral Grid Connection Agreement
CoCP	Code of Construction Practice
CoT	Project Commitment
CBRA	Cable Burial Risk Assessment
CfD	Contracts for Difference
CMS	Construction Method Statement
CSIP	Cable Specification and Installation Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food and Rural Affairs
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence
EnBW	Energie Baden-Württemberg AG
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPP	Evidence Plan Process
ES	Environmental Statement
EWG	Expert Working Group
GIS	Gas Insulated Switchgear
HDD	Horizontal Directional Drilling
HGV	Heavy goods vehicle
HNDR	Holistic Network Design Review
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IAQM	Institute of Air Quality Management
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario

Acronym	Meaning
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MTBM	Mini (or micro) tunnel boring machine
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PPP	Pollution Prevention Plan
PRoW	Public rights of way
SAC	Special Areas of Conservation
SAR	Search and Rescue
SPA	Special Protection Area
SNCBs	Statutory Nature Conservation Bodies
SSSI	Sit of Special Scientific Interest
SWMP	Site Waste Management Plan
TEP	Technical Engagement Plan
TJB	Transition Joint Bay
UK	United Kingdom
UXO	Unexploded Ordnance
WSI	Written scheme of investigation

Units

Unit	Description
%	Percentage
dB	Decibels
Kg	Kilogram
kHz	Kilohertz

Unit	Description
KJ	Kilojoules
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
m	Metres
m ²	Metres squared
m ³	Metres cubed
nm	Nautical mile
μPa	micropascal

1 Applicants' Response to IPs' Submissions at Deadline 5

1.1 Introduction

- 1.1.1.1 Following Deadline 5, 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 each of the submissions from Interested Parties are set out in this document.
- 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. REP5-001.1, REP5-001.2, etc.

2 Applicants' Response to IPs' submissions at Deadline 5

2.1 Marine Management Organisation Deadline 5 Submission - Summary

Table 2-1: REP5-175 – Marine Management Organisation Deadline 5 Submission - Summary

Reference	IP submission	Applicants' response
1. MMO's comments on Annex 2.5 Applicants responses (REP4-099)		
REP5-175 1.1	1.1 The MMO has reviewed and provided comments on the Applicants response to the Examination Authorities' (ExA) first Written Questions.	The Applicants note this comment.
REP5-175 1.2.1	1.2 Seasonal Restrictions 1.2.1 The MMO acknowledges the removal of high order UXO from DCO. Low-order UXO mitigation will be secured within the MMMP, and a seasonal restriction within the Liverpool Bay SPA has been set out in Commitment 130. The MMO questions how the commitment will be secured within the DML?	The seasonal restriction on UXO clearance within the Liverpool Bay SPA, CoT130, is secured within Measures to Minimise Disturbance to Marine Mammals and Rafting Birds from Vessels (document reference J16), which itself is secured in the draft DCO (document reference REP5a-018) under Condition 18(1)(f) of Schedule 14 and Schedule 15.
REP5-175 1.2.2	1.2.2 The MMO highlights that some low-order UXO clearances have resulted in high-order explosions. We ask the Applicants if they have confidence that all low order clearances will remain low.	<p>The Applicants are confident that the potential for low order UXO clearances resulting in high-order detonation, can be managed through the method statement required in Condition 20(1)(a) of Schedule 14 and 15 of the draft DCO (document reference REP5a-018).</p> <p>Furthermore, the Applicants are aware of the Defra UXO Joint Position Statement (Defra 2025a) and the associated Defra 'hierarchy of preference', which sets out four categories of UXO clearance techniques between low order and high order clearance with a preference for low order clearance techniques that have robust evidence of reduced environmental impacts from both controlled testing and at-sea clearances. The method statement and Marine Mammal Mitigation Protocol (MMMP) will be developed in accordance with the Defra UXO Joint Position Statement (and outline MMMP (REP4-070)) and any mitigation requirements will be agreed with the MMO in consultation with the statutory nature conservation body prior to undertaking UXO clearance works. Given the Applicants have included low order UXO clearance to</p>

Reference	IP submission	Applicants' response
		streamline the post-consent approvals, it is clearly in the Projects' interests to ensure the details provided to the MMO accord with the relevant guidelines and include measures to address any risk of inadvertent high order clearance.
REP5-175 1.2.3	1.2.3 A meeting was held between the Applicants and the MMO on 21 July 2025 to discuss. A method statement will be supplied prior to clearance activities for MMO approval.	Please see the Applicants' response to 1.2.2 above.
REP5-175 1.2.4	1.2.4 The MMO requests how the Applicants would provide information on the methods and details for UXO inspections?	<p>Condition 20(2) of Schedule 14 and 15 of the draft DCO (REP5a-018) require that the method statement and detailed MMMP must be submitted to the MMO for approval at least three months prior to the date on which low order UXO clearance activities are intended to begin. Note that Condition 20(2) has been updated at Deadline 6 (C1/F09) to remove the text struck-through below:</p> <p><i>(2) The method statement (excluding the information required under sub-paragraphs (1)(a)(ii) and (1)(a)(iii)) and the marine mammal mitigation protocol must be submitted to the MMO for approval at least three months prior to the date on which low order unexploded ordnance clearance activities are intended to begin.</i></p>
REP5-175 1.2.5	1.2.5 The MMO highlights that there is currently no mechanism to manage in-combination impact concerns post-consent, therefore, the MMO requests further clarity on when UXO activities will take place.	<p>During a meeting between the Applicants and the MMO on the 6 October 2025, the MMO explained the root concern of this comment relates to the Natural England response to ExQ2:9.3.2 (REP5-184) where Natural England highlight publication of the East Irish Sea Transmission Project scoping report and advise that further consideration of that project in-combination with the Transmission Assets may be necessary as there could be spatial and temporal overlap. The Applicants would highlight that the Cumulative effects assessment and in-combination assessment was updated at Deadline 5 (REP5-099) to take account of the East Irish Sea Transmission Project scoping report. REP5-099 highlights that there is no change to the conclusions of the ES following a Review of the CEA at Deadline 5, including the East Irish Sea Transmission Project scoping report. The same applies for the conclusions of the in-combination assessment.</p> <p>The Applicants would also highlight that they are not aware of any other outstanding concerns regarding UXO clearance and in-combination effects following the removal of high order UXO clearance from the draft DCO at Deadline 1 (REP1-008). The Natural England risk and issues log (REP5-177) confirms this, where the only outstanding matters relate to updates to the Outline MMMP (REP4-070) to remove reference to high order UXO clearance and the use of scare charges (completed at</p>

Reference	IP submission	Applicants' response
		<p>Deadline 2) and update to Volume 2, Chapter 4, Marine mammals, to make the same changes as for the Outline MMMP, which was completed at Deadline 5 (REP5-032).</p> <p>Regarding clarity on when UXO activities will take place, Condition 20 (a)(iii) of Schedules 14 and 15 of the draft DCO (REP5a-018) secures submission of a programme of works for low order UXO clearance, which, alongside the other pre-commencement documents set out under Condition 20(1)(a) and 20(1)(b), must be submitted to the MMO for approval at least three months prior to the date on which low order UXO clearance activities are intended to begin.</p> <p>As stated in the Applicants' response to Table 2-1, REP5-175 1.2.4 above, Condition 20(2) in the draft DCO has been updated at Deadline 6 (C1/F09) to make the submission timing of pre-commencement documents clear.</p> <p>The Applicants would also highlight that, as is best practice for the offshore wind industry, the Applicants would engage with the MMO and other key stakeholders at the earliest opportunity post consent (should consent be granted) to engage on the post-consent compliance / discharge process and programme. For example, the Applicants are aware that the Mona Offshore Wind Project and Morgan Offshore Wind Project, Generation Assets consent compliance teams recently met with the MMO, Natural Resources Wales, Natural England and the JNCC to discuss the process and programme for UXO clearance for those developments and the Applicants would seek to replicate this approach.</p>
REP5-175 1.2.6	1.2.6 The MMO questions if there is confidence that all low order clearances will remain low order, thus highlighting the need for separate UXO marine licences to assess worse-case scenarios.	Please see the Applicants' response to REP5-175 1.2.2 of Table 2-1 above.
REP5-175 1.3.1	<p>1.3 UXO Clearance – Marine Mammals</p> <p>1.3.1 Mitigation within the MMMP is still in discussions between the Applicants and the MMO.</p> <p>1.3.2 The MMO discuss the updated MMMP in Section 6 of our Deadline 5 submission.</p>	The Applicants have provided further comment on the outline MMMP (REP4-070) in Section 6 below.
REP5-175 1.4.1	1.4 Commercial Fisheries	The Applicants note this comment.

Reference	IP submission	Applicants' response
	1.4.1 The Applicants are not committing to preparing an Underwater Sound Management Strategy (UWSMS).	
REP5-175 1.4.2	1.4.2 Condition 18(f) of Schedules 14 & 15 secures the preparation of a Fisheries Liaison and Co-existence Plan. The MMO will defer to NFFO and IFCA and review their responses.	The Applicants note this comment.
REP5-175 1.4.3	1.4.3 The MMO highlights concerns from the local fishing industry stakeholders and refers the Applicants to the PINS website for comments.	The Applicants have provided specific responses in 1.4.4 and 1.4.5 of Table 2-2.
REP5-175 1.5.1	1.5 Marine Conservation Zone (MCZ) Assessment 1.5.1 The MMO highlights new commitments made by the Applicants regarding cable protection within the MCZ. The MMO welcomes these submissions and will review comments made by Natural England at Deadline 5.	The Applicants note this comment and confirm that an updated Marine Conservation Zone (MCZ) Screening and Stage 1 Assessment was submitted at Deadline 5 (REP5-023) to include the details of all new commitments relevant to the Fylde MCZ.
REP5-175 1.6.1	1.6 Outline Offshore Cable Specification and Installation Plan 1.6.1 The MMO discuss the updated CSIP in Section 4.2 of our Deadline 5 submission.	The Applicants have provided specific responses in Table 2-2, Section 4.
REP5-175 1.7.1	1.7 Outstanding Concerns 1.7.1 The MMO summarises which outstanding concerns have been resolved, and which are topics of ongoing discussion.	The Applicants note this comment.
2. Response to Examining Authority's Questions 2 (ExQ2) (PD-011)		
REP5-175 2.1	2.1 The MMO responded to a number of questions.	The Applicants have provided specific responses in Table 2-2, Section 2.
3. Response to the ExAs Commentary and Questions on the Draft DCO (PD-012)		
REP5-175 3.1	3.1 The MMO responded to a number of commentary/questions.	The Applicants have provided specific responses in Table 2-2, Section 3.

Reference	IP submission	Applicants' response
4. Comments on the Outline Cable Burial Risk Assessment		
REP5-175 4.1.1	updates (APP-219) 4.1 Physical Processes 4.1.1 The MMO reviewed clarifications received by the Applicants regarding cable exposure to shoreline retreat at the landfall location.	The Applicants note this comment.
REP5-175 4.1.2	4.1.2 The MMO notes that further spatial and temporal analysis is required.	The Applicants have provided specific responses in Table 2.2 Section 4.
REP5-175 4.1.3	4.1.3 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.	The Applicants have provided specific responses in Table 2.2 Section 4. (see REP5-175 4.1.3)
5. Comments on Annex 5.3 Commitments Register F05 (REP4-019)		
REP5-175 5.1.1	5.1 Physical Processes 5.1.1 The MMO reviewed and acknowledged new and updated commitments submitted by the Applicant's at Deadline 4.	The Applicants note this comment.
REP5-175 5.1.2	5.1.2 The MMO requests the Applicant's definition of 'urgent circumstances' for CoT135.	The Applicants have provided specific responses in Table 2.2 Section 4.
REP5-175 5.2.1	5.2 Fisheries and Fish Ecology 5.2.1 The MMO has no outstanding concerns regarding fisheries and fish ecology for this project.	The Applicants welcome this comment.
6. Comments on updated Outline Marine Mammal Mitigation Protocol (REP4-070)		
REP5-175 6.1.1	6.1 General Comments 6.1.1 The MMO welcomed the inclusion of seals and associated legislation within the MMMP. The MMMP will be reviewed and finalised post-consent.	The Applicants thank the MMO for the acknowledgement of the inclusion of seals and associated legislation within the outline MMMP. The Applicants confirm that Condition 20(1)(b) in Schedule 14 and Schedule 15 of the draft DCO (REP5a-018) requires the

Reference	IP submission	Applicants' response
		submission of a MMMP, in accordance with the outline MMMP, to the MMO for approval.
REP5-175 6.1.2	6.1.2 The amendments to the MMMP appear to be minor, therefore the MMO have no further comments on underwater noise impacts currently.	The Applicants note this comment.
7. Comments on updated Offshore In Principle Monitoring Plan (IPMP) (REP4-074)		
REP5-175 7.1.1	7.1 Benthic Ecology 7.1.1 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.	The Applicants note this comment.
REP5-175 7.1.2	7.1.2 Updates to the IPMP will be submitted at Deadline 5 to include adaptive measurements.	The Applicants submitted an updated Offshore In Principle Monitoring Plan (IPMP) at Deadline 5 (REP5-080) which included updates securing adaptive management.
REP5-175 7.2.1	7.2 Commercial Fisheries 7.2.1 The IPMP will include engineering asset integrity surveys to monitor cable burial status during Operation and Maintenance phases. The MMO supports this proposal.	The Applicants note this comment.
8. Comments on the Outline Offshore Operations and Maintenance Plan (OOOMP) (REP4-072)		
REP5-175 8.1.1	8.1 General Comments 8.1.1 The MMO notes the conditions which have been updated upon the MMO's request and welcomes these amendments.	The Applicants welcome this comment.
REP5-175 8.2.1	8.2 Benthic Ecology 8.2.1 The MMO confirms the amendments to benthic ecological interests are appropriate.	The Applicants welcome this comment.
REP5-175 8.3.1	8.3 Fish Ecology	The Applicants welcome this comment.

Reference	IP submission	Applicants' response
	8.3.1 The MMO has no further comments or concerns regarding the updates the licence conditions pertaining to fish ecology and fisheries.	
9. MMO Comments on outstanding Statement of Common Ground (SoCG) issues (REP4-082)		
REP5-175 9.1.1	9.1 General Comments 9.1.1 The MMO confirms that most issues previously discussed have been closed and agreed.	The Applicants welcome this comment.
REP5-175 9.1.2	9.1.2 Benefit of the Order (Article 6), Force Majeure (Condition 17(1)), Adaptive Management and UXO Clearance (number of low order clearances) remain outstanding topics of discussion.	The Applicants note this comment.
REP5-175 9.1.3	9.1.3 The MMO had a meeting with the Applicants on 11 September 2025 where the Applicant's discussed amendments to Condition 17(1) (Force Majeure) and Condition 19(2)(Timing of MMO reviews); the MMO welcomes these changes and notes these will be submitted at Deadline 5.	The draft DCO submitted at Deadline 5 (REP5a-018) included revisions to Condition 17(1) (Force Majeure) and Condition 19(2) and 11(4) (Timing of MMO reviews) in Schedule 14 and 15. Additionally, Condition 17(2) (Timing of MMO reviews) was revised in Schedule 16 and 17. Additionally, the Applicants have updated the draft DCO at Deadline 6 (C1/F09) to remove Condition 20(3) in Schedule 14 and 15 which also relates to timing of MMO reviews. The Applicants therefore consider these points to be resolved.
REP5-175 9.2.1	9.2 Fish and Shellfish Ecology – Monitoring and Mitigation 9.2.1 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.	The Applicants welcome this comment.
10. Clarification for Sediment Analysis Requirements		
REP5-175 10.1.1	10.1 General Comments 10.1.1 The MMO notes that a response provided at Deadline 4 regarding the Dredge and Disposal Site Characterisation Plan - Baseline Environment (APP-227)	The Applicants welcome the clarifications provided by the MMO relating to the validity period for sediment analyses.

Reference	IP submission	Applicants' response
	required clarification regarding sample analysis timeframes.	
REP5-175 10.1.2	10.1.2 The MMO have provided the Applicants with confirmation of the wording, which is accordance with the official MMO sediment analysis guidance on gov.uk.	
11. MMO Comments on other Stakeholder's Deadline 4 Responses		
REP5-175 11.1.1	11.1 Natural England (NE) 11.1.1 The MMO highlights ongoing topics of concern for NE.	The Applicants note this comment.
REP5-175 11.1.2	11.1.2 The MMO highlights that in a meeting with the Applicants on 11 September 2025, the Applicant's informed the MMO that discussions are ongoing with NE and they will be providing updates at Deadline 5 to close out several concerns.	

2.2 Marine Management Organisation Deadline 5 Submission

Table 2-2: REP5-175 – Marine Management Organisation Deadline 5 Submission

Reference	IP submission	Applicants' response
MMO's comments on Annex 2.5 Applicants responses (REP4-099)		
REP5-175 1.1.1	1.1 General Comments 1.1.1 The MMO provided updates at Deadline 3 (REP3-085). The Applicants have reviewed these submissions and have provided updated comments. The MMO has only provided further comments where we believe a response is required.	The Applicants note this comment.
REP5-175 1.1.2	1.1.2 The MMO notes the removal of bp Alternative Energy Investments Ltd. (bp), and the addition of JERA Nex bp (JNbp) as a joint Applicants throughout all updated plans	

Reference	IP submission	Applicants' response
	and documents. Ownership of Morecambe Offshore Windfarm Ltd has also changed from Zero-E Offshore Wind S.L.U. (Spain) (a Cobra group company) (Cobra) and Flotation Energy Ltd, to Copenhagen Infrastructure Partners' (CIP) fifth flagship fund, Copenhagen Infrastructure V (CI V).	
REP5-175 1.2.1	<p>1.2 ExA Questions (ExQ1) – Table 2.1: Q7.2.4 Seasonal Restrictions</p> <p><i>Please confirm that following the removal of high order Unexploded Ordnance (UXO) clearance from the deemed marine licenses submitted by the applicants at D2 [REP2-004] you are now content that no seasonal restriction on construction activities is required during the cod and herring spawning seasons.</i></p> <p>The MMO highlighted that our position is that no Unexploded Ordnance (UXO) clearances should be included within the DCO but welcomed the removal of high order UXO from the DCO on a without prejudice basis. It is the Applicants' position that it is appropriate and justified to include low-order UXO clearance activities within the DCO, noting that high-order UXO clearance has been removed from the draft DCO (REP3-009).</p>	The Applicants note this comment.
REP5-175 1.2.2	The MMO notes that the Mona Offshore Wind Project included low order UXO and that Morgan Generation Assets DCO has also included low order UXO. The MMO still maintains that UXO should not be included within the Deemed Marine Licences (DML). The MMO would also add that a number of projects have not included UXO within the DML to align with our position. 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 6.	The Applicants note this comment.

Reference	IP submission	Applicants' response
REP5-175 1.2.3	The MMO notes that the Applicants have included all necessary activities, and all such activities have been subject to a robust assessment process. This includes UXO clearance activities, with suitable mitigation in the Outline Marine Mammal Mitigation Protocol (MMMP) (REP2-026)) and committed to not clearing UXO within the Liverpool Bay Special Protection Area (SPA) between November – March, inclusive, as set out under CoT130 in the Commitments Register (REP3-013). The MMO questions how the commitment will be secured within the DML?	Please see the Applicants' response to Table 2-1, 1.2.1 above.
REP5-175 1.2.4	The MMO notes Condition 20 of Schedules 14 and 15 (REP3-009) includes a number of requirements and specifies the maximum number of clearances (22 and 3 respectively) the MMO is largely content on a without prejudice basis that should the secretary of State (SoS) include low order UXO that these conditions provide the required information for the UXO clearance works at the post consent stage. The MMO would like to ask the Applicants how we would be provided the information of the methods and details for the UXO inspections?	The Applicants welcome the MMO without prejudice position. With regard to provision of information, please see the Applicants' response to Table 2-1, 1.2.4 above.
REP5-175 1.2.5	The MMO would add that NE, JNCC, and The Wildlife Trust (TWT) have raised concerns in relation to including UXO within the DMLs and this is linked with the in-combination impact assessment. Although the Applicants have committed to not clearing UXO November to March, and most of the cable is not directly within a Marine Protected Area, there is still a concern that there will be an in-combination impact at population level, and at this stage it is not clear when all activities will take place. Therefore, the MMO would highlight that there is currently no mechanism to manage this concern post consent.	<p>The JNCC is not an Interested Party in this Examination and the Applicants are not aware of any submission by JNCC into this Examination. Offshore matters raised in The Wildlife Trust (TWT) written representation (REP1-210) relate to:</p> <ul style="list-style-type: none"> • Fylde MCZ - the need for a stage 2 MCZ assessment (measures of equivalent environmental benefit (MEEB)) and • Subsea construction noise – welcomed the Applicants commitment to mitigation considering the Defra (2025b) guidance on reduce marine noise. <p>The Applicants responded to TWT at Deadline 2 (REP2-036) to explain that the MEEB was submitted at Deadline 1 (REP1-059) and that the draft DCO was updated at Deadline 1 (REP1-008) to revise UXO clearance to low order methods only. TWT have not since submitted a representation into the Examination, therefore the Applicants consider that offshore matters raised by TWT have been addressed.</p>

Reference	IP submission	Applicants' response
		<p>Regarding Natural England, please see the Applicants response in Table 2-1, 1.2.5 above.</p> <p>The Applicants concluded from the cumulative impact assessment for UXO clearance that this would not result in a significant effect, except for harbour porpoise but based on expert judgement it is considered that this would not manifest to population level effects and is unlikely to affect the international value of the species. The measures set out in the outline MMMP will reduce the magnitude of this potential significant impact such that there will be no residual significant effect for the Transmission Assets alone and therefore no contribution to cumulative effects. Further, the Applicants highlight that Natural England agree with the conclusion that low order methods have no potential to result in adverse effects on integrity of any SAC for the project alone or in-combination on any SACs designated for marine mammals within English waters (for UXO, in response to a direct question posed by the Examining Authority's written questions (REP5-184, Q2:9.3.3).</p> <p>Therefore, the Applicants are not aware of any in-combination matters requiring management. However, as stated in in Table 2-1, 1.2.5 above, Condition 20 in Schedule 14 and 15 of the draft DCO (REP5a-018) secures timescales for submission of pre-commencement documents and plans to the MMO and the Applicants would engage with the MMO and key stakeholders on the consent compliance discharge programme at the earliest opportunity post-consent (should consent be granted) to engage on the post-consent compliance / discharge process and programme. For example, the Applicants are aware that the Mona Offshore Wind Project and Morgan Offshore Wind Project, Generation Assets consent compliance teams recently met with the MMO, Natural Resources Wales, Natural England and the JNCC to discuss the process and programme for UXO clearance for those developments and the Applicants would seek to replicate this approach.</p>
REP5-175 1.2.6	The MMO would also highlight that it is not our intention to hinder the delivery of the project to contribute to the UK Government targets for Net Zero, and notes a wildlife licence will be required and it is MMO's best practice to process both the UXO marine licence and the wildlife licence alongside each other to ensure all issues including in combination are managed at the same time. Therefore, there are still licence requirements post consent and the	The Applicants are aware of the need to apply for a European Protected Species (EPS) licence post-consent as set out in Consents and Licences Required Under Other Legislation (REP3-037). The Applicants will engage with the MMO at the earliest opportunity post-consent (should consent be granted) on the post-consent compliance programme. Notwithstanding this, the Applicants' position regarding the inclusion of Low Order Clearance in the UXO remains as set out above and in previous responses to the MMO (see PDA-013, REP2-033, REP3-054, REP4-099 and REP5-123).

Reference	IP submission	Applicants' response
	MMO does not see why a UXO clearance marine licence cannot also be applied for at this time.	
REP5-175 1.2.7	The MMO also highlighted that some low order UXO clearance campaigns have led to accidental high order explosions and would question if there is still confidence that all low order clearances will remain low order. The Applicants is content that this can be done through the method statement required in Condition 20(1)(a) of Schedule 14 and 15 of the DML. On UXO marine licences the MMO currently includes a high order worst case assessment to ensure that if a new method was to be used that this allows an assessment of an accidental high order. Without high order in the DML, the MMO would highlight that it may be less likely to approve a new or novel method of low order clearance as we would need the confidence to approve the method and ensure there would be no accidental high order. If there was a high order detonation, then there would be a breach of the licence and enforcement action would have to be taken.	Please see the Applicants response to Table 2-1, 1.2.2 above. The Applicants are aware of the preference for low order clearance techniques that have robust evidence of reduced environmental impacts from both controlled testing and at-sea clearances. The projects consider that the requirement for the MMO to approve a UXO clearance method statement (under condition 20 of the deemed marine licence in Schedules 14 and 15 of the draft DCO), which will be informed by a further UXO survey, ensures that any risk of high order clearance is appropriately managed. Given the Applicants have included low order UXO clearance to streamline the post-consent approvals, it is clearly in the Projects' interests to ensure the details provided to the MMO accord with the relevant guidelines and include measures to address any risk of inadvertent high order clearance.
REP5-175 1.3.1	1.3 ExA Questions (ExQ1) – Q1: 7.3.2 UXO Clearance – Marine Mammals <i>Do the amendments to the DMLs address your concerns regarding UXO clearance?</i> The MMO noted that details of specific mitigation measures within the Marine Mammal Mitigation Protocol (MMMP) are still in discussion with the Applicants. The MMO have provided an updated to our stance in Section 6 of this document.	The Applicants have provided responses in Section 6 of Table 2-2 below.
REP5-175 1.3.2	Following best practice for the industry, the Applicants have prepared an outline MMMP (updated at Deadline 4, REP4-070) and have secured under Condition 20 of Schedule 14 and 15 in the draft DCO (REP3-009) the submission of a detailed MMMP in accordance with the outline MMMP post-consent once the final details of the	The Applicants have provided responses in Section 6 of Table 2-2 below.

Reference	IP submission	Applicants' response
	project are known. Comments on the updated MMMP can be found in Section 6 of this document.	
REP5-175 1.4.1	<p>1.4 ExA Questions (ExQ1) – Q1: 17.2.3 Commercial Fisheries</p> <p><i>Are you content with the applicants' response to your suggestion that there should be a programme to monitor the impact of the project on bass and other commercial fisheries pages 62 and 63 of [REP1- 086]?</i></p> <p>The MMO has provided an updated response regarding the Underwater Sound Management Strategy (UWSMS) in Section 2 of this document.</p>	The Applicants have provided a response to this in Table 2-2, 2.7.1 below.
REP5-175 1.4.2	The MMO notes that Condition 18(f) of Schedules 14 and 15 of the draft DCO (REP3-009) secures the preparation of detailed Fisheries Liaison and Co-existence Plan(s) (FLCP) which must be accord with the outline FLCP (REP3-028).	The Applicants note this comment.
REP5-175 1.4.3	The MMO notes that the National Federation of Fisherman's Organisations (NFFO) and Inshore Fisheries Conservation Authorities (IFCA) have also been asked to consider if they are content with the outline FLCP and the MMO will review their responses.	The Applicants note this comment.
REP5-175 1.4.4	The MMO would like to highlight that we have had correspondence and complaints from local fishers on the impact of multiple projects within the Liverpool Bay area. We have directed the individuals to the PINS website to provide comments within Examination. These comments are in relation to Bass numbers and a reduction in catch. The complaint directly links to the current geophysical surveys which are classed as low-risk activities and less impactful than the construction activities, therefore consideration of the in-combination impacts should be reviewed.	The Applicants reiterate their previous response to the Relevant Representations (PDA-013, RR-1414, 1414.26), in which it is pointed out that impacts associated with geophysical surveys are short term and spatially limited and agree with the MMO that these are low risk activities to fish, including bass. These surveys, alongside other vessel and construction work are intermittent and occur within a marine environment of existing anthropogenic ambient background sound. The impact of this underwater sound has been assessed alone and cumulatively with other plans or projects (section 3.11 and section 3.13, respectively, in Volume 2, Chapter 3: Fish and shellfish ecology (APP-048)), with no significant impact on any fish or shellfish receptors concluded.

Reference	IP submission	Applicants' response
REP5-175 1.4.5	The MMO considered it unlikely that the low sea bass numbers could be solely related the presence of geotechnical survey vessels, however further evidence may be provided on the impact and wanted to highlight the fishers' concerns.	The Applicants note the MMO comment that it is unlikely that the low sea bass numbers could be solely related to the survey activities and will review any further information that may be provided by the MMO.
REP5-175 1.5.1	<p>1.5 Marine Conservation Zone (MCZ) Assessment (Table 2.3, Section 2.11))</p> <p><i>The MMO will maintain a watching brief on this document and discussions in relation to MCZs and would remind the Applicants that any mitigation secured through these assessments will need to be included within the conditions on the DML.</i></p> <p>The MMO notes that the Applicants have noted that Volume 1, Annex 5.3: Commitments Register submitted at Deadline 3 (REP3- 013) contains details of how all the commitments relevant to the Fylde MCZ are secured through the draft DCO (REP3-009).</p>	The Applicants note this comment and would highlight that they submitted an updated Marine Conservation Zone (MCZ) Screening and Stage 1 Assessment (REP5-022) and Stage 2 MCZ Assessment (REP5-094) at Deadline 5 to include the details of all new commitments relevant to the Fylde MCZ.
REP5-175 1.5.2	The MMO notes that a new commitment in the Outline Offshore Operations and Maintenance Plan (OOOMP) at Deadline 4 (REP4-072) to limit deployment of cable protection outside the Fylde MCZ to 10 years / limit of the cable protection Max Design Scenario (MDS) – whichever is first. Following this, deployment of cable protection during the operation and maintenance phase would require a new marine licence application. Within the Fylde MCZ, the Applicants are committed to limiting the deployment of cable protection, without the requirement for a new marine licence, to the first two years of the operation and maintenance phase. The Applicants would highlight that this timing is required to allow for any 'snagging' delays in construction phase deployment and to cover the Offshore Transmission Owner (OFTO) divestment period. Following this two-year period, any further deployment of cable protection during the operation and maintenance phase	The Applicants note this comment.

Reference	IP submission	Applicants' response
	within the Fylde MCZ would require a new marine licence application.	
REP5-175 1.5.3	The MMO notes the inclusion of a commitment to 'no rock dumping within Fylde MCZ' in the draft DCO submitted at Deadline 4 (REP4-008).	The Applicants note this comment.
REP5-175 1.5.4	The MMO notes a new commitment that should benthic compensation be required, the Marine Recovery Fund (MRF) will be the preferred and prioritised option, and the project-led options would only be considered where the MRF option is not made available to the Applicants (see Volume 1, Annex 5.3: Commitments Register, REP4-018).	The Applicants note this comment.
REP5-175 1.5.5	The MMO notes that the Applicants has confirmed that clarifications regarding the MCZ Screening and Stage 1 Assessment Report (APP-019) have been provided in the errata documents (REP1-064, REP2-028, REP3-039). Additionally, the Applicants provided a Stage 2 MCZ Assessment, including a without prejudice, in-principle Measures of Equivalent Environmental Benefit (MEEB) Plan, at Deadline 1 (REP1-059) which updated the MDS for long term habitat loss of each of the features to account for the cable crossing occurring only within the subtidal mud feature. The Applicants confirm that an updated MCZ Screening and Stage 1 Assessment Report (APP-019) to include these clarifications/updates will be submitted at Deadline 5. The MMO welcomes the submission of an updated assessment report.	The Applicants submitted an updated MCZ Screening and Stage 1 Assessment at Deadline 5 (REP5-022) and Stage 2 MCZ Assessment (REP5-094) to include the details of all new commitments relevant to the Fylde MCZ.
REP5-175 1.6.1	1.6 J15 Outline Offshore Cable Specification and Installation Plan (CSIP) (Table 2.5, Section 5.3) <i>The MMO notes that previous advice stated that the Applicants must ensure that target cable burial at the nearshore/landfall was defined with consideration for natural shoreline retreat and hence potential shoreline</i>	The Applicants have provided specific responses in Table 2.2 Section 4.

Reference	IP submission	Applicants' response
	<p><i>realignment (natural or managed). This is still unresolved and the MMO will maintain a watching brief.</i></p> <p>The MMO has reviewed the Applicant's clarifications provided at Deadline 4 and has provided an updated response in Section 4 of this document.</p>	
REP5-175 1.7.1	<p>1.7 Outstanding Concerns (Table 2.7)</p> <p>Applicants Response to Rule 9 Letter (RR-1414-03)</p> <p>The MMO notes that the Applicant's provided a response to the ExAs Rule 9 letter in March 2025 (AS-068 & AS-070).</p>	The Applicants note this comment.
REP5-175 1.7.2	The MMO can confirm that we have no further comments to make (other than what has already been discussed throughout examination) following a full review of the Applicant's response to the Rule 9 Letter.	
REP5-175 1.7.3	<p>DML Timescales (RR-1414-19)</p> <p>The MMO confirms that the Applicants updated the DMLs and DCO at Deadline 4, and this matter has now been resolved. Further comments can be found in Section 8 of this document.</p>	The Applicants have provided specific responses in Table 2.2 Section 8. Please also see Table 2-1, 1.2.4 above.
REP5-175 1.7.4	<p>Force Majeure (RR-1414-20)</p> <p>The MMO notes that this matter is still being reviewed, and further comments can be found in Section 3.2 of this document.</p>	The Applicants have provided specific responses in Table 2.2 Section 3.
REP5-175 1.7.5	<p>Environmental Statement: Construction Scenarios (RR-1414-22)</p> <p>The MMO confirms that this matter was resolved at Deadline 4.</p>	The Applicants welcome this comment.
REP5-175 1.7.6	<p>Cable Burial Risk Assessment (RR-1414-23)</p> <p>The MMO acknowledges that the Applicants provided further clarity on the detail around location and design of</p>	The Applicants have provided specific responses in Table 2.2 Section 4.

Reference	IP submission	Applicants' response
	cable protection. However, the MMO believes that further assessment is required. Please see our comments in Section 4.1 of this document.	
REP5-175 1.7.7	Fish and Shellfish Ecology (RR-1414-24 & RR-1414-25) The MMO can confirm that this matter was resolved at Deadline 4. Also see our comments on the SoCG in Section 9 of this document.	The Applicants welcome this comment.
REP5-175 1.7.8 1.7.9	Underwater Noise (RR-1414-27) The only outstanding comments are in relation to the inclusion of UXO within the DCO Application which will remain a disagreed position. Noting that should the Secretary of State include UXO, then we will ensure we are content with all the information within the DML and relevant plans. All other comments have been responded to and although the MMO may not agree with the Applicants, this does not impact the conclusions and therefore on this occasion considers these matters closed.	The Applicants welcome this comment.
2. MMO's Responses to Examining Authority's Questions 2 (ExQ2) (PD-011)		
REP5-175 2.1.1	2.1 Critical National Priority Q2: 1.1.7 <i>Are there any further submissions any party wishes to make on the potential application of CNP policy in this case (should it be required)?</i> The MMO will review other responses to this questions and highlights that ALL mitigation possible is applied during the examination period.	The Applicants note this comment.
REP5-175 2.2.1	2.2 Benthic Ecology Matters with Natural England Q2: 7.2.2 – 7.2.7 The MMO will keep a watching brief and continue discussions with the Applicants regarding these matters.	The Applicants note this comment.

Reference	IP submission	Applicants' response
REP5-175 2.3.1	<p>2.3 Marine Mammals Q2: 7.4.1 – 7.4.3</p> <p>UXO Clearance</p> <p><i>Following recent meetings with the applicants and the discussion on this issue at ISH2 summarised in [REP4-104] at 5(c)(i) has NE's position on this issue changed? If there has been no change, provide the rationale for maintaining that position.</i></p> <p>The MMO will keep a watching brief and continue discussions with the Applicants regarding these matters.</p>	The Applicants note this comment.
REP5-175 2.3.2	<p>DML</p> <p><i>Without prejudice to your position on the inclusion of UXO clearance in DMLs, comment on the maximum number of low order UXO clearances proposed by the applicants in the latest version of the draft deemed marine licences (22 for Morgan and 3 for Morecombe), paragraph 20(7) of Schedules 14 and 15 (REP4-007).</i></p> <p>The MMO has provided further comments on UXO in Section 1.2 of this document. On a without prejudice basis, the MMO welcomes the maximum number of UXO clearances being stated on the DML.</p>	The Applicants welcome this comment.
REP5-175 2.4.1	<p>2.4 Information to Support Appropriate Assessment (ISAA) Q2: 9.3.1</p> <p><i>Winter Vessel Movements and Offshore Ornithology</i></p> <p><i>The applicants have added a new commitment CoT135 to the latest commitments register [REP4-018] - "The Applicants will not plan routine O&M activities in the original Liverpool Bay special protection area (SPA) (as designated in 2010), including a 2 km buffer between November and March (inclusive) unless in urgent circumstances". a) Are your concerns about adverse effects in the operation and maintenance phase resolved? If not, why not? b) Are you now in agreement that there will be no adverse effect on the integrity of Liverpool Bay SPA</i></p>	<p>CoT135 is secured in the Outline Offshore Operations and Maintenance Plan (OOMP) (REP4-072). Condition 11(3) of Schedule 14 and 15 of the draft DCO (REP5a-018) secures submission of an OOMP, in accordance with the Outline OOMP, to the MMO at least six months prior to commencement of the operation of licensed activities.</p> <p>Regarding the definition of 'urgent circumstances', the Outline OOMP has been updated at Deadline 6 (J19/F03) to explain that urgent circumstances would be an export cable exposure, which is a risk to navigation, or an export cable failure. This is therefore secured through the wording of Condition 11(3) of Schedule 14 and 15 of the draft DCO (REP5a-018).</p>

Reference	IP submission	Applicants' response
	<p><i>arising from impacts to offshore ornithology features? If not, what concerns remain and how can the applicants address them?</i></p> <p>Although the MMO defers the details to NE as the Statutory Nature Conservation Body (SNCB), the MMO would like to understand how this will be secured on the DML and asks the Applicants for a definition of 'urgent circumstances'. The MMO undertakes compliance reviews post consent and needs to ensure that this is enforceable. The MMO will also engage with the Applicants and NE on this matter.</p>	
REP5-175 2.5.1	<p>2.5 ISAA (Marine Mammals Adverse Effects on Integrity (AEol) conclusions) Q2: 9.3.2</p> <p><i>Do you consider that the inclusion of low order UXO clearance has the potential to result in AEol to any marine mammals qualifying features of the SACs assessed within the HRA ISAA?</i></p> <p>The MMO will keep a watching brief and continue discussions with the Applicants regarding these matters.</p>	The Applicants note this comment.
REP5-175 2.6.1	<p>2.6 Commercial Fisheries Q2: 17.2.1 & 17.2.2</p> <p>Outline Fisheries Liaison and Co-existence Plan (OFLCP)</p> <p><i>Are you content with the OFLCP [APP-218]? Are there any amendments/ additions that you would recommend?</i></p> <p>The MMO will keep a watching brief over National Federation of Fishermen's Organisations (NFFO) and Northwest Inshore Fisheries and Conservation Authority's (NWIFCA) submissions.</p>	The Applicants note this comment.
REP5-175 2.7.1	<p>2.7 Underwater Sound Management Strategy (UWSMS)</p> <p><i>In response to Q17.2.3 of the ExA's first written questions [PD-008] MMO noted that the applicants were in the process of developing an UWSMS that might use Noise</i></p>	The Applicants welcome the MMO's confirmation on this point.

Reference	IP submission	Applicants' response
	<p><i>Abatement Systems such as bubble curtains and piling dampeners. In [REP4-099] the applicants have highlighted that they have not committed to the preparation of a UWSMS because no pile driving is required for the transmission assets. Do you have any comments given this clarification?</i></p> <p>The MMO previously stated that the Applicants were in the process of developing an UWSMS. The Morgan Generation Assets and Morecambe Generation Assets applications have included this commitment to manage underwater sound emissions associated with pile driving, which may include the use of Noise abatement Systems (NAS). However, no pile driving is required for the Transmission Assets project, and therefore NAS is not being proposed for this project that would be covered by an underwater sound management strategy. The MMO and the Applicants discussed this point on 11 September 2025. The MMO understands that the Applicants have not committed to the preparation of an UWSMS and this was an error by the MMO.</p>	
<p>REP5-175 2.7.2</p>	<p>However, the MMO set out in Section 1.2 that other interested parties (NE/JNCC) have raised concerns in relation to marine mammals and in-combination impacts, the MMO will continue discussions with the Applicants and interested parties but it may be worthwhile to have a similar document, should low order UXO be maintained in the DML to conduct an in-combination assessment should the in-combination impact be a concern. Although there isn't a Harbour Porpoise Special Area of Conservation (SAC) impacted a document could be similar to the Southern North Sea Site Integrity Plan on the East coast as this was also used for UXO clearances for East Anglia One North and East Anglia Two projects.</p>	<p>Please see the Applicants' response to Table 2-2, 1.2.5 above. An outline MMMP has been prepared to manage the potential effects of injury to marine mammals from a range of noise-producing activities (UXO clearance and site investigation surveys). The purpose of the MMMP is also to reduce the magnitude of any potential significant impacts such that there will be no residual significant effects from the project alone, thereby reducing the contribution to cumulative effects (and in-combination effects). The Applicants highlight that the HRA Stage 2 Information to support an appropriate assessment (Part 2; Special Areas of Conservation (SAC) assessments) (APP-016) determined that there would be no adverse effects on the integrity of any SACs designated for marine mammal features either from the Transmission Assets project alone or in-combination with other plans or projects within the marine mammal cumulative study area. The Applicants are also confident that the MMMP is an appropriate document to manage potential in-combination effects. Further, the Applicants highlight that Natural England agree with the conclusion that low order</p>

Reference	IP submission	Applicants' response
		methods have no potential to result in adverse effects on integrity of any SAC for the project alone or in-combination on any SACs designated for marine mammals within English waters (for UXO, in response to a direct question posed by the Examining Authority's written questions (PD-011)) (REP5-184, Q2:9.3.3).
REP5-175 2.7.3	However, the MMO would require clear parameters set by the SNCB or SoS as part of the consent to be able to manage in-combination noise if this was identified as a concern. Since there is no SAC then the harbour porpoise thresholds cannot be utilised to manage the impacts.	The Applicants note this response but highlight the information presented above in response to Table 2-2, 2.7.2.
3. MMO's Response to the ExAs Commentary and Questions on the draft development consent order (PD-012)		
REP5-175 3.1.1 3.1.2	3.1 Articles Q1.1.2(b): Article 6 – Benefit of the Order <i>Further to the recently made Morgan DCO, does the MMO have any further comments on the issues it has previously raised regarding Article 6?</i> 3.1.1 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 6. 3.1.2 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.	The Applicants note this comment. The Applicants note they updated article 6(6) of the draft DCO (REP5a-018) at Deadline 5 to ensure that the Secretary of State consults the MMO regarding a transfer or grant. This further aligns the article with that in the made Morgan Offshore Wind Project: Generation Assets Order 2025.
REP5-175 3.2.1	3.2 Schedule 14: Marine Licence 1: Morgan Offshore Wind Project Transmission Assets Q1.6.1: Part 1, Article 2 – Details of licenced marine activities <i>In paragraph (g) should there be reference to the specific Work No, rather than "Order limits" as included in the recent Mona and Rampion II Development Consent Orders (DCOs)?</i>	The Applicants note this comment. The Applicants would also highlight that Part 1 - Paragraph 2(g) of Schedule 14 and 15 of the draft DCO has been updated at Deadline 6 (C1/F09) as "...cubic metres of inert material of natural origin within the Order limits produced during seabed preparation for cable works and boulder clearance works at disposal site references to be provided by the MMO in writing within the Order limits".

Reference	IP submission	Applicants' response
	<p>3.2.1 The MMO notes that paragraph (g) currently states <i>"the disposal of up to 1,080,000 cubic metres of inert material of natural origin within the Order limits produced during seabed preparation for cable works and boulder clearance works at disposal site references to be provided to the MMO within the Order limits."</i> The MMO has no preference on this wording as disposal will be authorised for the whole of the site up to the limits within the condition. The MMO will discuss this with the Applicants.</p>	
<p>REP5-175</p> <p>3.2.2</p> <p>3.2.3</p> <p>3.2.4</p>	<p>Q1.6.2 Condition 17 – Force majeure</p> <p><i>The Examining Authority (ExA) suggests the inclusion of the additional wording that was agreed by the Secretary of State in condition 19 of the deemed Marine Licences in the Morgan DCO.</i></p> <p>3.2.2 The MMO had a meeting with the Applicants on 11 September 2025 where they confirmed that they will be updating the wording suggested by the Secretary of State (SoS) in the Morgan DCO: <i>"If due to stress of weather or any other cause beyond the reasonable control of the master of a vessel, and which the master of a vessel by the exercise of reasonable diligence is unable to prevent, avoid or remove, the master of a vessel determines that it is necessary to deposit the authorised deposits within or outside of the Order limits because the safety of human life or of the vessel is threatened, within 48 hours the undertaker must notify full details of the circumstances of the deposit to the MMO"</i>.</p> <p>3.2.3 The MMO welcomes the updates by the Applicants.</p> <p>3.2.4 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 6. The MMO is aiming to work with the Applicants, so all positions are clear at Deadline 6.</p>	<p>The Applicants note this comment and confirm that the draft DCO (REP5a-018) was updated at Deadline 5 to align Condition 17(1) in Schedule 14 and 15 with the relevant drafting included in the Morgan Offshore Wind Project Generation Assets made Order.</p>

Reference	IP submission	Applicants' response
REP5-175 3.2.5	<p>Q1.6.3 Condition 19</p> <p><i>Should 19(2) be deleted as agreed by the Secretary of State in the Morgan DCO (condition 21 of the deemed Marine Licences)?</i></p> <p>3.2.5 Regarding Condition 19(2), the MMO had a meeting with the Applicants on 11 September 2025 where they confirmed that the timing of the MMO's review will be deleted ahead of Deadline 5. The MMO welcomes this amendment.</p>	<p>The Applicants confirm that this change was made to the draft DCO (REP5a-018) submitted at Deadline 5. Please also see Table 2-1, 9.1.3 above.</p>
REP5-175 3.2.6 3.2.7 3.2.8	<p>Q1.6.4 Condition 20 – Low order unexploded ordnance clearance</p> <p><i>a) Clarify what is mean by “large debris”. Should this be defined?</i></p> <p><i>b) Is an underwater sound management strategy required for low order UXO clearance (as included in condition 22 of the deemed Martine Licences in the Morgan DCO)?</i></p> <p>3.2.6 Q1:6.4 – The MMO asks the Applicants to clarify what is meant by ‘large debris’ within Condition 20.</p> <p>3.2.7 Q1:6.4 - The MMO noted at Deadline 4 that within the Morgan DCO, an UWSMS is required for low order UXO clearance. Upon meeting with the Applicants and reviewing their Deadline 4 response, the MMO now considers that an UWSMS is not necessary for the Transmission Assets Projects. However, the MMO set out in Section 2.7 of this document that other interested parties (NE/JNCC) have raised concerns in relation to marine mammals and in-combination impacts, the MMO will continue discussions with the Applicants and interested parties, but it may be worthwhile to have a similar document, should low order UXO be maintained in the DML to conduct an in-combination assessment should the in-combination impacts be a concern.</p>	<p>With regard to ‘large debris’ please see the Applicants’ response to Q1:6.4 in the Applicants’ response to The Examining Authority’s commentary and questions on the draft development consent order (REP5-141), which is set out below for ease of reference:</p> <p><i>Condition 20(1)(a)(i) of Schedule 14 and Schedule 15 of the draft DCO (REP4-007) specifically secures the submission of a low order UXO clearance methodology, including details of the removal and disposal of large debris. This detail will be informed by the UXO clearance contractor commissioned to undertake the work, which has not yet been appointed at this stage prior to consent.</i></p> <p><i>Based on existing marine licences for UXO clearance issued by the Marine Management Organisation (MMO) including East Anglia One, Triton Knoll and Dogger Bank A and B, it is anticipated that any remaining debris greater than approximately 0.3m will require recovery by the remotely operated vehicle (ROV) undertaking the clearance.</i></p> <p><i>Therefore, whilst large debris could be defined as debris of approximately 0.3m or greater, it is the Applicants’ position that it is unnecessary to define large debris as there is clear understanding within the industry with regards to what large debris means and this is not a contentious matter. Once the UXO clearance contractor has been appointed post-consent (should consent be granted), Condition 20 of Schedule 14 and Schedule 15 of the draft DCO (REP4-007) secures submission of low order UXO clearance methodologies, which will address removal and disposal of large debris, to the MMO for approval prior to commencement of the activity.</i></p> <p>With regard to the need for an UWSMS for low order UXO clearance, the Applicants’ position is this is unnecessary, as set out in the Applicants’ response in REP5-141:</p>

Reference	IP submission	Applicants' response
	3.2.8 The MMO has provided an update in Section 2.7 of this document.	<i>It is the Applicants position that an underwater sound management strategy (UWSMS) is not required for low order UXO clearance. The inclusion of the UWSMS within the made Order for Morgan Offshore Wind Project Generation Assets relates to the inclusion of wind turbine generator foundation and offshore substation foundation pile driving associated with that project, which is particularly loud and is not an activity included in the Application for the Transmission Assets. The Applicants would highlight that Condition 20 of Schedule 14 and Schedule 15 of the draft DCO (REP4-007) already includes for submission of a marine mammal mitigation protocol (MMMP) in accordance with the outline (MMMP) (REP4-070), the intention of which is to prevent injury to marine mammals and the MMO confirmed at Deadline 2 (see 4.4.5 and 4.4.6 on page 48 of REP2-061) that the removal of high order UXO clearance from the draft DCO removed the MMO concerns regarding the potential impact of UXO clearance on fish. Therefore, an UWSMS is considered to be unnecessary.</i>
REP5-175 3.3.1	3.3 Schedules 14, 15, 16 and 17 – Marine Licences Q1.7.1 Marine Licences – General <i>Provide an update on any outstanding concerns you have on the draft Marine Licences in Schedules 14, 15, 16 and 17 of the draft Development Consent Order, including where relevant any suggested alternative drafting if agreement cannot be reached.</i> <p>The MMO has provided an update in Section 1.7 of this document on the outstanding matters. There are no new matters at this stage.</p>	The Applicants note this comment.
REP5-175 3.3.2	Q1.7.2 Marine Licences – General <i>Are any amendments/ additions needed to the draft Marine Licences following the recent grant of Development Consent for the Morgan generation assets project?</i> <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</p>	The Applicants note this comment.

Reference	IP submission	Applicants' response
	ExA) or at Deadline 5. The MMO is aiming to work with the Applicants, so all positions are clear at Deadline 5.	
4. MMO's comments on Outline Cable Burial Risk Assessment updates (APP-219)		
REP5-175 4.1.1	<p>4.1 Physical Processes</p> <p>The MMO notes that the Applicants provided further clarification on previous concerns on the risk of future cable exposure due to shoreline retreat at the landfall location. These clarifications in points have been outlined below:</p> <ul style="list-style-type: none"> • The detailed assessment of beach level variability, as set out in the Outline Cable Burial Risk Assessment (CBRA), identifies intertidal variability of up to ± 1.5 metres (m). Accordingly, the target Depth of Lowering (DoL) for cable burial has been conservatively established at 3.0 m below beach surface level. This ensures that even under conditions of maximum recorded variability, the minimum burial depth would remain at least 1.5m, sufficient to prevent cable exposure and associated risks. • In terms of shoreline retreat, the analysis undertaken by the Applicants, to inform the CBRA, also confirms a trend of sediment accumulation and dune migration seaward, rather than significant shoreline recession, at the selected landfall site. This indicates a limited likelihood of future shoreline retreat posing a risk to the buried cables. The Applicants confirm that the potential for future shoreline changes, including the scenario of natural realignment and retreat, has been factored into the burial depth design. The design approach adopted incorporates a conservative burial DoL of 3.0m to mitigate the risk of cable exposure due to future beach-level variations, including scenarios involving shoreline retreat. 	The Applicants note this comment.

Reference	IP submission	Applicants' response
REP5-175 4.1.2	<p>The MMO notes that whilst the information provided by the Applicants is useful, more spatial and temporal detail about the dynamics of the landing site is required to allay concerns. The cable will land adjacent to the mouth of an estuary, presumably a highly dynamic environment. It follows that the stated accretional trends should be contextualised with respect to the surrounding area. Notably, is there a section of nearby beach that has eroded? If so, would the cable remain buried if the landing site were to erode by a similar extent? Moreover, the period over which the stated observed trends should be considered with respect to the install life of the cable. Indeed, the stated accretionary trend of the landing site provides little assurance if the period over which this observation was made is significantly less than the install life of the cable.</p>	<p>To provide a wider context for the potential evolution of the shoreline in response to this comment, a number of factors were considered by the Applicants including shoreline profiles over a period of 17 years (presented in The Assessment of Seabed Level Vertical Variability (REP4-122)), Shoreline Management Plans (SMP) both current and going forward (https://environment.data.gov.uk/ Unit 11B1.21), and Volume 1, Chapter 3: Project description (REP5-024).</p> <p>Figure 33 in The Assessment of Seabed Level Vertical Variability (REP4-122) signifies there are three distinct zones along the beach profile. The lower beach indicates the variability which has been applied to define the conservative burial depth of 3 m; whilst the upper beach has undergone little change over the 17 years period for which the shoreline profiles were analysed implying it is very stable. The dunes have shown accretion seaward over this period which can be largely attributed to Fylde Dune Project applying active management realignment techniques to accrete the dune system seawards.</p> <p>Looking forward through the Transmission project lifespan, based on the existing transport processes, the sediment transport in the most active lower beach generally takes place in a southerly direction, however the source of sediment is offshore and there is no indication that this will change over the lifespan of the Transmission Assets. Whilst the final design of the Transmission Assets may necessitate cable protection, the physical processes assessment (undertaken for the MDS) does not predict any hindering of existing sediment transport regimes. As noted previously, the SMP, which is currently 'Managed realignment of Natural features' means the dune system has been undergoing active management realignment for the delivery of the Environment Agency SMP (https://environment.data.gov.uk/ Unit 11B1.21). Going forward for the periods 2025 to 2055 and 2055 to 2105 the plan is to "Hold the line with Natural features", therefore the dune system will be maintained and there is the potential for further accretion seaward over the project lifespan.</p> <p>The updated Coastal Erosion Risk Assessment which forms part of the SMP indicates that at the landfall site, the area where erosion risk is present is largely located in the upper beach and the risk areas are 27 m and 65 m from the position of the coast in 2020 for the 2055 and 2105 intervals respectively. It is also noted that values are unchanged between the scenario where the SMP is delivered and where no further intervention is made.</p> <p>It is recognised that the upper beach may be subjected to drawdown during storm conditions going forward despite the dunes, and the position of the coastline, being</p>

Reference	IP submission	Applicants' response
		<p>maintained. Notwithstanding that this area has shown to be very stable in the past there are also project specific aspects which provide further reassurance that the Transmission Assets are very unlikely to become exposed. The target burial depth of 3 m applies to the offshore export cable up to the location of the exit pit from the trenchless section under the sand dunes. This is to be located at least 100 m from the boundary of the Lytham St. Annes Dunes SSSI within the intertidal zone. As outlined in the Outline Landfall Construction Method Statement (REP5-116), cables will be installed by direct pipe installation with coverage of at least 3 m at the location of the exit pit. From this location, going onshore, the pipes which carry the cables will have a downward orientation to ensure a minimum 10 m drill depth will be achieved under all sensitive receptors; with drilling depths ranging from a minimum of 10 m to a maximum of 30 m under the sand dunes. Therefore, in the upper beach, burial depths will be significantly greater than the already conservative depth of 3 m further reducing the likelihood of exposure over the lifespan of the project.</p> <p>This position was shared with the MMO on 14 October 2025 and the MMO confirmed by email on 15 October 2025 that the Applicants' response closes out the matter.</p>
REP5-175 4.1.3	If the Applicants cannot supply the additional information demonstrating a long-term, large-scale accretionary trend, the MMO deems it is reasonable to request that the Applicants consider the impact of the cable exposure if the shoreline was to retreat.	The Applicants reiterate that the potential for future shoreline changes has been factored into the burial depth design. The design approach adopted incorporates a conservative target burial Depth of Lowering (DoL) of 3.0m to mitigate the risk of cable exposure due to future beach-level variations. The burial depth specified does not rely on long-term, large-scale accretion in order to avoid exposure and as set out above evidenced current and future trends, shoreline managements plans and erosion risk have been considered within the burial depth design.
5. MMO's Comments on Annex 5.3 Commitments Register F05 (REP4-019)		
REP5-175 5.1.1	5.1 Physical Processes The MMO has reviewed the additional commitment CoT114 on pages 25 and 53. CoT114 has been added to provide detail of the project's commitment to bury permanent infrastructure to a target depth of 3m within the intertidal area defined between Mean Low Water Springs (MLWS) and Mean High Water Springs (MHWS).	The Applicants note this comment.
REP5-175	The MMO notes in CoT133, the Applicants have stated that no cable/scour protection shall be permanently	The Applicants submit that this is sufficiently secured within the draft DCO (REP5a-018). CoT133 is secured in the Outline Landfall Construction Method Statement (see

Reference	IP submission	Applicants' response
5.1.2	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 will wait for a revised CSIP to confirm this but believes it would be beneficial if this commitment was clear on the face of the DML as a condition.	Table 1; REP5-116) which is secured through Requirement 8(2)(q) of Schedule 2A and 2B of the draft DCO (REP5a-018) which requires submission of a landfall construction method statement (in accordance with the outline landfall construction method statement) to the relevant planning authority, and in relation to intertidal works, the MMO.
REP5-175 5.1.3	The MMO notes in CoT134 the Applicants have stated that as part of the detailed process, micro-sitting 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.	The Applicants note this comment.
REP5-175 5.1.4	The MMO notes in CoT135, the Applicants have stated that they will not plan routine O&M activities in the original Liverpool Bay SPA (as designated in 2010), including a 2km buffer between November and March (inclusive) unless in urgent circumstances. The MMO would request the Applicants definition of ' <i>urgent circumstances</i> '. In addition to this the MMO would request this is conditioned on the face of the DML.	Please see the Applicants' response to Table 2-2, 2.4.1 above.
REP5-175 5.1.5	The MMO notes in CoT136, the Applicants have stated that should benthic compensation be required, the Marine Recovery Fund would be the preferred option over the project-led options.	The Applicants would highlight that Natural England have confirmed in their comments on the Examining Authority's Written Questions (ExQ2; REP5-184) that their position is aligned with that of the Applicants', and that strategic compensation with a payment into the Marine Recovery Fund (MRF) should be the preferred and prioritised option for the Transmission Assets.
REP5-175 5.1.6	The MMO is aware that a new commitment will be included at Deadline 5 to include the engagement with other offshore energy operators (for example: Simultaneous Operations with Spirit Energy).	The Applicants updated the Commitment Register at Deadline 5 (REP5-027) to include this commitment under CoT137).
REP5-175 5.2.1	5.2 Fisheries and Fish Ecology	The Applicants welcome this comment.

Reference	IP submission	Applicants' response
	The MMO notes and welcomes the additional commitments of relevance to fish ecology, namely CoT47, CoT71, and CoT133.	
REP5-175 5.2.2	The MMO does not have any outstanding concerns regarding fisheries and fish ecology for this project.	The Applicants welcome this comment.
6. MMO's Comments on updated Outline Marine Mammal Mitigation Protocol (REP4-070)		
REP5-175 6.1.1	6.1 General Comments The MMO welcomes the inclusion of seals and the associated legislation within the Outline MMMP document.	The Applicants thank the MMO for the acknowledgement of the inclusion of seals and associated legislation within the MMMP.
REP5-175 6.1.2	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.	The Applicants thank the MMO for their comments and agreement on the approach to finalising communication methods in the final MMMP(s).
REP5-175 6.2.1	6.2 Underwater Noise 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.	The Applicants note this comment.
7. MMO's Comments on updated Offshore in Principle Monitoring Plan (IPMP) (REP4-074)		
REP5-175 7.1.1	7.1 Benthic Ecology The MMO notes that with regards to benthic subtidal and intertidal ecology the Applicants have concluded that all residual effects are deemed to be minor adverse or lower significance. The MMO is satisfied with these conclusions.	The Applicants welcome this comment.
REP5-175 7.1.2	The MMO notes and welcomes the inclusion of the 'Pre-construction phase' within the monitoring plan. The Applicants aim to set a pre-construction baseline against which to monitor the temporal and spatial recovery of the benthic communities within the Fylde MCZ through post-construction benthic sampling, in order to evaluate the	The Applicants note this comment.

Reference	IP submission	Applicants' response
	effects of construction activities and the progression of community recovery over time. The MMO notes that monitoring will be carried out via baseline surveys to describe the spatial extent of pre-construction benthic communities. The monitoring will occur under Condition 18(1)(d) pre-construction plans and documentation, and DCO Schedule 15 (Marine Licence 2: Morecambe Offshore Windfarm Transmission Assets).	
REP5-175 7.1.3	The MMO notes change from benthic ecology to seabed sediments in relation to impacts on recovery of sediments in the Fylde MCZ.	The Applicants note this comment. The Offshore IPMP have been updated at Deadline 6 (J20/F05) to make specific reference to sandwave monitoring to address comments from Natural England.
REP5-175 7.1.4	The MMO notes and welcomes the inclusion of Invasive Non-Native Species (INNS) within the IPMP.	The Applicants welcome this comment.
REP5-175 7.1.5	The MMO notes that the amendments to the document pertaining to benthic ecological interests are appropriate.	The Applicants welcome this comment.
REP5-175 7.1.6	Following a meeting with the Applicant's on 11 September 2025, the MMO is aware that updates to the IPMP will be submitted at Deadline 5 to include adaptive measurements based on our comments made at Deadline 4. The MMO welcomes these updates and we look forward to reviewing these in due course.	The Applicants welcome this response and confirm that an updated Offshore IPMP was submitted at Deadline 5 (REP5-080).
REP5-175 7.2.1	7.2 Commercial Fisheries The MMO notes that the proposal will include engineering asset integrity surveys to monitor the burial status of the export cables during the operation and maintenance phase to ensure that cables remain adequately buried and to reduce the risk of snagging by commercial fishing gear. The MMO supports this proposal.	The Applicants note this comment.
8. MMO's Comments on Outline Offshore Operations and Maintenance Plan (OOOMP) (REP4-072)		
REP5-175	8.1 General Comments	The Applicants note this comment.

Reference	IP submission	Applicants' response
8.1.1	The MMO is pleased to see that Condition 11(3) has been updated to amend the approval timeframe for MMO from four months to six months prior to commencement of the operation of licensed activities.	
REP5-175 8.1.2	<p>The MMO notes the inclusion of updated Condition 11 wording for Schedules 14 & 15:</p> <p><i>Condition 11(4) - The MMO must determine an application for approval made under this condition within a period of six months commencing on the date the application is received by the MMO, unless otherwise agreed in writing with the undertaker. All operation and maintenance activities must be carried out in accordance with the approved plan.</i></p> <p><i>Condition 11(5) - An annual maintenance report must be submitted to the MMO within one month following the first anniversary of the date of first operation of the authorised development (notified in accordance with Condition 28 (Completion of construction)) and every year thereafter until the permanent cessation of operation.</i></p> <p><i>Condition 11(6) - The annual maintenance report in sub-paragraph (5) must provide a record of the licensed activities during the preceding year, the timing of activities and methodologies used.</i></p> <p><i>Condition 11(7) - Every fifth year, the undertaker must submit to the MMO, within one month of the anniversary of the date of first operation of authorised development (notified in accordance with Condition 28 (Completion of construction)), a consolidated maintenance report which will—</i></p> <p><i>(a) include a review of licensed activities undertaken during the preceding five years with reference to the reports submitted in accordance with sub-paragraph (5) of this licence; and</i></p>	Condition 11(4) in Schedule 14 and 15 of the draft DCO (REP5a-018) was updated at Deadline 5.

Reference	IP submission	Applicants' response
	<i>(b) reconfirm the applicability of the methodologies and frequencies of the licensed activities permitted by this licence for the duration of this licence.</i>	
REP5-175 8.1.3	The MMO request that Condition 11(4) is updated to remove reference to MMO determination dates as this has been removed elsewhere in the DML.	
REP5-175 8.1.4	The MMO asks the Applicants to amend Condition 11(5) to state that <i>"an annual maintenance report must be submitted to the MMO in writing within one month following the first anniversary of the date of first operation of the authorised development (notified in accordance with Condition 28 (Completion of construction)) and every year thereafter until the permanent cessation of operation."</i>	The Applicants have made the revision to Condition 11(5) in Schedule 14 and 15 of the draft DCO at Deadline 6 (C1/F09), noting that the Applicants will retain the wording 'authorised scheme' to align with the defined terms in the DMLs which encompasses the relevant works for each deemed marine licence and avoids confusion.
REP5-175 8.1.5	The MMO is happy with the wording for Condition 11(6).	The Applicants welcome this comment.
REP5-175 8.1.6	The MMO is happy with the wording for Condition 11(7).	The Applicants welcome this comment.
REP5-175 8.2.1	8.2 Benthic Ecology The MMO notes that the amendments to the document pertaining to benthic ecological interests are appropriate.	The Applicants welcome this comment.
REP5-175 8.3.1	8.3 Fish Ecology The MMO has no comments or concerns regarding the updates to licence condition 11 parts 4, 5, 6, 7(a), &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.	The Applicants welcome this comment.
9. MMO's comments on outstanding Statement of Common Ground (SoCG) issues (REP4-082)		

Reference	IP submission	Applicants' response
REP5-175 9.1.1	9.1 SoCG (REP3-085) General Comments The MMO notes that most issues previously discussed have been closed out and agreed.	The Applicants welcome this comment.
REP5-175 9.1.2	There remains some topics that either will not be agreed throughout examination, or that are still in discussion with the Applicants. We highlight these topics below: <ul style="list-style-type: none"> Article 6 Transfer of Benefit Force Majeure UXO Clearance (inclusion of UXO on the DML) Adaptive Management 	The Applicants and the MMO have engaged on these outstanding matters through finalisation of the SoCG submitted at Deadline 6 (S_D1_6.8/F04) where it is noted that: <ul style="list-style-type: none"> Article 6 Transfer of Benefit: Not agreed Force majeure: Not agreed UXO Clearance (inclusion of UXO in the DML): Not agreed Adaptive management: Inclusion in the Offshore In Principle Management Plan is agreed. Non-inclusion of a condition for adaptive management in the deemed marine licence is not agreed. The basis for the Applicants' position and the MMO position on each matter is set out in the SoCG (S_D1_6.8/F04).
REP5-175 9.1.3	Additionally, the MMO also welcomes the updated to Condition 19(2) Timing of MMO reviews which will be deleted in the updated draft DCO and Schedules 16 & 17 at Deadline 5.	The Applicants confirm that these updates were made to the draft DCO (REP5a-018) at Deadline 5.
REP5-175 9.1.4	The following topics were discussed and resolved in a meeting between the Applicants and the MMO on 21 July 2025: <ul style="list-style-type: none"> Marine Archaeology Use of artificial lighting Recovery of dropped objects Seabed preparation activities as a result of jack-up operations 	The Applicants note this comment.
REP5-175 9.1.5	The MMO notes that the Applicants have provided an updated OOOMP at Deadline 4 (REP4-072) to address	The Applicants note this comment.

Reference	IP submission	Applicants' response
	these matters. Further comments on the OOOMP can be found in Section 8 of this document.	
REP5-175 9.1.6	The MMO acknowledges that an updated IPMP has been submitted at Deadline 4 (REP4-074), which now includes a statement for physical processes, benthic subtidal and intertidal ecology, commercial fisheries, and marine archaeology to confirm that following the application of measures (commitments) adopted as part of the Transmission Assets, residual effects are deemed to be of minor adverse or lower significance. The MMO provides further comments on the IPMP in Section 7 of this document.	The Applicants note this comment.
REP5-175 9.2.1	9.2 Fish and Shellfish Ecology - Monitoring and Mitigation 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.	The Applicants welcome this comment.
10. Clarification for Sediment Analysis Requirements		
REP5-175 10.1.1	10.1 General Comments It was noted in a meeting with the Applicants on 11 September 2025 that a response the MMO provided at Deadline 4 regarding the Dredge and Disposal Site Characterisation Plan - Baseline Environment (APP-227) required clarification regarding sample analysis timeframes.	The Applicants welcome the clarifications provided by the MMO relating to the validity period for sediment analyses.
REP5-175 10.1.2	The MMO emailed the Applicants on 17 September 2025 to confirm that the wording should read: " <i>You may use existing analytical data on the physical and chemical</i> "	

Reference	IP submission	Applicants' response
	<i>properties of sediments in support of your marine licence application. The information must be from a laboratory that has been validated by the MMO at the time of the analysis. 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> This is in accordance with the official MMO sediment analysis guidance on gov.uk. Should the ExA require a PDF of this document, please request this.	
11. MMO's Comments on other Stakeholder's Deadline 4 Responses		
REP5-175 11.1.1	11.1 Natural England (REP4-140 & REP4-141) The MMO notes that Natural England (NE) still has ongoing concerns towards the impacts to sand dune within Lytham St. Annes Site of Special Scientific Interest (SSSI). NE has highlighted that impacts on dune slack vegetation need to be thoroughly assessed and a more precautionary approach with regards to the recoverability/resilience of dune slacks need to be considered. In addition, NE has highlighted that additional detailed dune slack surveys across the study area are required and that these should be undertaken during summer 2025.	The Applicants note these comments and continue to engage with Natural England with the aim of resolving outstanding matters. Regarding point 11.1.2, the Applicants commitment to no construction activities at landfall on Lytham St. Annes beach between November and March inclusive (CoT129) is secured in the Outline Ecological Management Plan (see Table 1-1; REP5-068) which is secured through Requirement 12 of Schedule 2A and 2B of the draft DCO (REP5a-018) which requires approval of an ecological management plan (in accordance with the outline ecological management plan). CoT129 is also secured in the Outline Landfall Construction Method Statement (see Table 1; REP5-116) which is secured through Requirement 8(2)(q) of Schedule 2A and 2B of the draft DCO (REP5a-018) which requires approval of a landfall construction method statement (in accordance with the outline landfall construction method statement). Therefore, the Applicants consider that CoT129 is sufficiently secured within the draft DCO (REP5a-018).
REP5-175 11.1.2	The MMO notes that NE has advised that the proposed level of restriction to the landfall works is insufficient to avoid an adverse effect on the Ribble and Alt Estuaries SPA/Ramsar Site. However, the MMO has noted that the Applicants are committed to a restriction on the construction activity from November to March at landfall. While this appears to address NE concerns, concerns regarding the passage features of the SPA and Ramsar site remain outstanding. The MMO would also ask how this is to be secured on the DML?	
REP5-175 11.1.3	The MMO notes that NE still has concerns regarding the effectiveness of the proposed initiative at Fairhaven	

Reference	IP submission	Applicants' response
	saltmarsh, noting that the concerns constitute compensation.	
REP5-175 11.1.4	The MMO notes that NE has highlighted that information still lacks sufficient detail regarding mitigating impacts to SPA/RAMSAR site waterbirds. NE has noted that they require further information to support the HRA conclusions, consideration of spatial scheduling to reduce the level of impact, and greater detail on the proposed mitigation habitats.	
REP5-175 11.1.5	The MMO notes that NE advises that monitoring of the water table pre- and post- construction and modelling to understand changes to the water table over the duration of the development is required. This is revolving the comment from NE which states they are unable to rule out significant impacts on sand dune SSSI features associated with Lytham St. Annes Dunes due to uncertainties around changes to the water table. The MMO notes and welcomes the Applicants comment that surveys will be carried out at Lytham St. Annes Dunes SSSI.	
REP5-175 11.1.6	The MMO notes that NE advises that for the passage intertidal features NE do not agree with the conclusion that impacts can be ruled out. NE has noted that reliance on alternative feeding would require knowledge of why this area is so important and consideration in the first instance of seasonal restrictions to works for important passage periods for the species of concern.	
REP5-175 11.1.7	The MMO notes that NE has identified that no MEEB provisions deal with the end of life or end of Works within REP3-066. NE advises the inclusion of provisions to deal with the end of life of the project/MEEB requirements.	
REP5-175 11.1.8	The MMO had a meeting with the Applicants on 11 September 2025. The Applicant's updated the MMO that	The Applicants note this comment.

Reference	IP submission	Applicants' response
11.1.9	<p>they are providing updates at Deadline 5 to close out the following concerns with NE:</p> <ul style="list-style-type: none"> • Benthic subtidal and intertidal ecology • Physical Processes, Marine Mammals • Offshore Ornithology • ISAA (Part 3) • MCZ (Stage 1 and Stage 2) • Project Description. <p>11.1.9 The MMO will review all the updates and comments from NE and provide a response where required.</p>	

2.3 References

Defra (2025a) Guidance. Supporting minimising environmental impacts from unexploded ordnance clearance. Published 21 January 2025. Available at: Marine environment: unexploded ordnance clearance Joint Position Statement - GOV.UK

Defra (2025b) Policy paper. Reducing marine noise. Published 21 January 2025. Available at: Reducing marine noise - GOV.UK