



Norfolk Boreas Case Team  
Planning Inspectorate  
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(Email only)

MMO Reference: DCO/2017/00002  
Planning Inspectorate Reference: EN010087  
Identification Number: 20022925

26 February 2020

Dear Ms Fernandes,

## **Planning Act 2008, Norfolk Boreas Limited, Proposed Norfolk Boreas Offshore Wind Farm**

### **Deadline 5 Response – Cover Letter**

On 11 June 2019, the Marine Management Organisation (the “MMO”) received notice under section 56 of the Planning Act 2008 (the “PA 2008”) that the Planning Inspectorate (“PINS”) had accepted an application made by Norfolk Boreas Limited (the “Applicant”) for determination of a development consent order for the construction, maintenance and operation of the proposed Norfolk Boreas Offshore Wind Farm (the “DCO Application”) (MMO ref: DCO/2017/00002; PINS ref: EN010087).

The Applicant seeks authorisation for the construction, operation and maintenance of the DCO Application, comprising of up to 180 wind turbine generators together with associated onshore and offshore infrastructure and all associated development (“the “Project”).

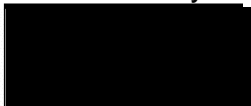
The MMO received a Rule 17 letter on 12 February 2020. In response to this letter, the MMO submits the following:

- 1. Responses to the Examining Authority’s second round of written questions**
- 2. Comments on Draft DCO (REP4-004)**
- 3. Deadline 5 MMO update on comments raised at Deadline 4**

The MMO is in discussion with the applicant in relation to the comments on the relevant representation. The MMO has entered into a Statement of Common Ground with the applicant that will be submitted by the applicant on the MMO’s behalf at deadline 6.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours faithfully



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## **1. Responses to the ExA's Written Questions**

### **1.1 ExA second round of Written Questions**

Please find the table including the MMOs response to the ExA Written Questions in the following document EN010087-001245-ExA-WQs-DL5-MMO-Response-final, enclosed with this letter.

## **2. Comments on Draft DCO (REP4-004)**

### **2.1 Parameters for Individual Structures**

Part 3, requirement 4(5)(4) and 11, Schedules 9 and 10, Condition 3 and condition 8(1)(g), Schedules 11 and 12, Condition 2 have all been updated to include reference to tables within the Outline Scour and Cable Protection Plan. These tables refer to the parameters for the individual structures.

The MMO requests that Schedule 11 and 12 Condition 3(1)(b) is updated with similar wording to Schedule 9 Condition 8(1)(g).

Once this is updated the MMO, in this situation, is content that this secures the parameters for individual structures.

### **2.2 Notification of Cable Exposure**

The MMO welcomes the update by the Applicant to change the notification of cable exposure from *'five days'* to *'three days'* in Schedules 9 and 10, Condition 9(12), Schedules 11 and 12, Condition 4(12) and Schedule 13, Condition 3(12).

### **2.3 Hammer Energy**

The MMO welcomes the update by the Applicant to all necessary schedules to include the hammer energy for both monopile foundations and pin piles.

### **2.4 Post Construction Surveys**

The MMO welcomes the update by the Applicant amending the wording in Condition 20(2)(a) and relevant conditions in other DML Schedules from *'a survey'* to *'an appropriate survey'*.

### **2.5 Reporting scour protection**

The MMO is satisfied with the updated wording in Condition 22 and relevant conditions in other DML Schedules to include the reporting of Scour Protection.

## **3. Deadline 5 MMO update on comments raised at Deadline 4**

### **3.1 As-built vs consented use in in-combination Collision Risk modelling**

The MMO believes this is for the SoS to take into account within the HRA assessment. The MMO defer to NE in relation to HRA aspects.

If the MMO was to conduct the in combination assessment, the MMO approach would be to discharge the obligation on the worst case consented parameters. The MMO would require comfort there was no mechanism for the elevation of the as-built figures to the consented figures.

## **4. Implications on Norfolk Boreas DML's of the proposed amendments put forward in Norfolk Vanguard SoS letter comment 33**

The MMO has reviewed the Applicant's response (REP4-014) to Agenda item 8 and can confirm the MMO has no further comments on the items raised on a Lighting and Marking Plan or Operation and Maintenance Programme as these are covered within alternative

conditions within the DML schedules. The MMO believes no further updates are required to the DCO.

#### **4.1 Arbitration and appeals**

The MMO understands that the decision on the Norfolk Vanguard, Hornsea 3 and Thanet Extension offshore wind farm projects has been delayed until 1 June 2020. As this will be after the end of the Norfolk Boreas examination, the MMO highlights that the current position on Arbitration and Appeals will remain as an ongoing disagreement.

#### **4.2 Update on Cable Protection Position Statement**

The Cable Protection Position Statement document is in the final stages of being signed off and comments will be submitted at Deadline 7. The MMO and the Applicant are in agreement regarding the concept of how cable protection is consented for the construction and operations and maintenance phase of the Norfolk Boreas Project.

Yours faithfully

A black rectangular box redacting the signature of Rebecca Reed.

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# Marine Management Organisation

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26 February 2020

Dear Sir or Madam,

## **Planning Act 2008, Norfolk Boreas Limited, Proposed Norfolk Boreas Offshore Wind Farm**

### **Responses to the Examining Authority's (ExA) Second Round of Written Questions**

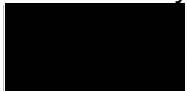
The Marine Management Organisation (MMO) is an interested party for the examination of Development Consent Order (DCO) applications for Nationally Significant Infrastructure Projects (NSIPs) in the marine area. Should consent be granted for the project, the MMO will be responsible for monitoring, compliance and enforcement of Deemed Marine Licence (DML) conditions.

The MMO received a Rule 17 letter containing the ExA's second round of written questions on 12 February 2020 for the proposed Norfolk Boreas Offshore Wind Farm (Ref EN010087). Please find the MMO's response to the ExA's second round of questions below for your consideration.

In order to ensure clarity, who the question was directed to and the question to which the answer has been provided has been incorporated in this response.

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours faithfully



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INVESTORS  
IN PEOPLE | Bronze





EN010087 – Norfolk Boreas – The Examining Authority’s second written questions and requests for information  
Issued on 12 February 2020 for submission at Deadline 5.

ExQ2	Question to:	Question:	MMO Response:
<b>1. Archaeology and Heritage Assets</b>			
<b>1.0 Offshore and intertidal archaeology</b>			
Q2.1.0.4	Historic England (HBMCE) Natural England (NE) Marine Management Organisation (MMO)	<b>Clarification note on relationship of archaeology and reef features:</b>  Comment by Deadline 5 on the clarification note [REP4-022] provided by the Applicant at Deadline 4 ‘ <i>Optimising Cable Routing through the HHW SAC</i> ’.	<p>The MMO welcomes the document as clarity to how the cable route takes into account both HHW SAC features and Archaeology features. The Document is well presented and provides a lot of detail.</p> <p>However, the MMO still has concerns that micrositing may not be possible at the time of construction and would like this to be dealt with at consenting stage rather than post consent.</p> <p>The MMO note that NE have queried how the MMO would make a decision between the potential impacts to Annex 1 reef and Archaeological interest features.</p> <p>It would be the MMO’s duty to protect as far as possible both these features and we would not envisage a scenario where one element is prioritised over another. This again highlights the difficulties the MMO would experience if</p>

ExQ2	Question to:	Question:	MMO Response:
			<p>confidence cannot be reached at this stage regarding micro-siting.</p> <p>The MMO defers to NE on matters of HRA and Adverse Effect on Integrity. The MMO defers to Historic England on the Archaeology features.</p> <p>The MMO is in discussion with the Applicant and NE about the use of the HHW SAC SIP and the related condition (Schedule 11 &amp; 12 9(1)(m)). The MMO has concerns that if the SoS makes a decision on AEoI as part of the Conservation of Habitats and Species Regulations 2010 on the HHW SAC then the condition is not fit for purpose as it does not take into account the Derogation process. Alongside this the Applicant has removed all sections relating to the HHW SAC from the Outline certified plans (such as the Outline Cable and Scour Protection Plan) and included this in the HHW SAC SIP document. The MMO is concerned that if the SoS were to make a decision (either no adverse effect or derogation route), condition 9(1)(m) could be removed from the DMLs and with this the HHW SAC SIP and all included information could be lost at the consenting stage as this information is only included in the SIP document.</p> <p>The MMO is aware the Applicant will be proposing an alternative condition and document in relation to Norfolk Vanguard for this scenario. The MMO will work with the Applicant on the wording of this condition and</p>

ExQ2	Question to:	Question:	MMO Response:
			provide comments once this is submitted into the Norfolk Boreas examination.
<b>2. Biodiversity, Biological Environment and Ecology</b>			
<b>2.0 Offshore benthic and marine mammals</b>			
Q2.2.0.2	The Applicant, Marine Management Organisation, Natural England	<p><b>Environmental Statement and Worst-case scenarios:</b></p> <p>The Applicant [REP4-011] states that the MMO has now agreed that updating the Environmental Statement (ES) may not be appropriate and that the MMO will provide suggestions on how documentation can be structured/referenced to help them as regulator. There is a relationship between the assessment in the ES (which would become a certified document) and the Conditions in the DMLs which would allow a variation/amendment to approved plans, protocols or statements so long as they are unlikely to give rise to any materially new or different effects from those assessed. Given that a number of parameters have changed/may change since the ES was submitted (eg cable protection and potentially turbine draught heights), the Applicant to explain</p>	<p>The MMO's initial position was that the ES should be updated to take into account any changes through the examination period.</p> <p>However, after further discussion and the Applicant's comments below the MMO is open to an alternative option (REP4-009):</p> <p><i>"ES is a record of what is assessed, not what is permitted and therefore does not require any updates."</i></p> <p><i>"relevant parameters consented are set out in the DCO/DML itself, and that is what should be relied upon post consent"</i></p> <p>The MMO agrees with the Applicant that the DCO/DML is the consent for the project and this will develop further from the ES, the MMO requires this to be made clear within the DCO/DML.</p> <p>The MMO requires all the finalised and updated figures to be updated within the DCO/DML at consenting stage to highlight the need for a variation if any of these are amended.</p> <p>Further comments have been provided in Q2.5.1.1 and Q2.5.1.9.</p>



ExQ2	Question to:	Question:	MMO Response:
		why the current drafting of the DMLs is acceptable.	
Q2.2.0.3	Applicant Marine Management Organisation	<b>Post construction monitoring:</b> Applicant/MMO to provide update of discussions on post-construction monitoring to assess long-term changes in benthic assemblages [REP2-051, REP3-017]].	The MMO has been in discussion with the Applicant and the MMO's technical advisors to find agreement on this point.  The Applicant has proposed amendments to the In Principle Monitoring Plan to allow for the discussion of increasing the scope of benthic monitoring to be discussed upon submission of the document.  The MMO is currently consulting with the MMO's technical advisors and will provide confirmation at Deadline 6.
Q2.2.0.4	The Applicant Marine Management Organisation	<b>Benthic habitats:</b> MMO and the Applicant to update on discussions relating to the potential for drill arisings to alter benthic habitat, marked as not agreed in the SoCG [REP2-051]	The MMO's technical advisors agree that there is no potential for drill arisings to alter the benthic habitat in light of the Applicant's response in Table 5 of AS-024. This will be reflected in the updated SoCG the Applicant will submit at Deadline 6.
Q2.2.0.5	The Applicant Natural England Marine Management Organisation	<b>Marine Mammal Monitoring:</b> NE, MMO and Applicant to provide an update regarding drafting of a condition for marine mammal monitoring	The MMO, NE and the Applicant had a joint meeting on 17 February 2020 to discuss this point further. NE has requested a marine mammal monitoring condition. The current action is on NE to provide an example condition. The MMO will continue discussions with NE and the Applicant on the addition of a condition. A further update will be provided at Deadline 6.
Q2.2.0.7	Applicant	<b>Sandeel:</b>	The MMO agrees with the conclusions in the ES that impacts to sandeel resulting from

ExQ2	Question to:	Question:	MMO Response:
	Marine Management Organisation	Applicant/MMO to provide an update regarding discussions around cumulative effects and monitoring of sandeel [REP2-051].	<p>disturbance to habitat and temporary and permanent loss of habitat will be of minor adverse significance. The concern relates to the cumulative impact of minor adverse impacts to sandeel occurring across multiple wind farm sites in the southern North Sea, which is not currently being monitored.</p> <p>The Applicant has proposed amendments to the In Principle Monitoring Plan to allow for the discussion of increasing the scope of benthic monitoring to be discussed upon submission of the document. The MMO is currently consulting with the its technical advisors and will provide confirmation at Deadline 6.</p>

## 5. Development Consent Order and Deemed Marine Licences

### 5.0 General

Q2.5.0.2	Norfolk County Council Breckland Council Broadland District Council North Norfolk District Council Natural England Marine Management Organisation	<p><b>Outstanding matters on the dDCO:</b></p> <p>The Applicant has provided responses to matters raised by the relevant planning authorities and other post-consent approval bodies at Deadlines 2, 3 and 4. Aside from the matters questioned below, set out any outstanding concerns with the dDCO submitted at Deadline 4 [REP4-004].</p>	<p>All outstanding issues not included in the ExA questions are within the SoCG that will be submitted at Deadline 6 by the Applicant.</p> <p>A summary of ongoing issues (not including Arbitration/Appeals as there will be no movement on these issues) is provided below:</p> <ul style="list-style-type: none"> <li>- Cable Crossings</li> </ul> <p>The Applicant has provided further comments and the MMO is currently discussing this internally – the MMO will provide an update at Deadline 6.</p> <ul style="list-style-type: none"> <li>- Disposal Sites</li> </ul>
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ExQ2	Question to:	Question:	MMO Response:
			<p>The MMO is working closely with the Applicant and the MMO's technical advisors to resolve outstanding queries and provide the disposal site references as soon as possible.</p> <p>- Definition of Inert</p> <p>The MMO still requires the inclusion of a definition of inert – the MMO has sent further comments to the Applicant, has received a response and is reviewing this internally. The MMO will provide an update at Deadline 6.</p>
<b>5.1 Articles</b>			
Q2.5.1.1	<p>The Applicant Natural England MMO Norfolk County Council Breckland Council Broadland District Council North Norfolk District Council</p>	<p><b>Article 2: Interpretation: Environmental Statement:</b> The Applicant has stated that the “<i>ES is a record of what is assessed, not what is permitted and therefore does not require any updates.</i>” [REP4-009, No.1].</p> <ol style="list-style-type: none"> <li>1. Are consenting authorities content with this position?</li> <li>2. The Applicant is invited to consider an extension to the definition of the ES in Article 2 to clarify the fixed point in time nature of the ES assessment.</li> <li>3. Consenting authorities to comment if they think this clarification is necessary.</li> </ol>	<ol style="list-style-type: none"> <li>1. Please refer to Q2.2.0.2 for detailed comments</li> <li>3. The MMO welcomes clarity within the interpretation and believes this would provide comfort to the MMO that the ES is a snapshot in time and is used to inform consent. It does not represent consent in of itself.</li> </ol>
Q2.5.1.9	<p>The Applicant Norfolk County Council</p>	<p><b>Article 37: Certification of Plans:</b></p>	<ol style="list-style-type: none"> <li>4. The MMO agrees with the ExA views that there is a need to capture the versions of the</li> </ol>

ExQ2	Question to:	Question:	MMO Response:
	<p>Breckland Council Broadland District Council North Norfolk District Council Marine Management Organisation Natural England</p>	<p>The ExA notes the Applicant's response in its Written Summary of Oral Case submitted at the DCO ISH [REP1-041] to its point regarding the need for ensuring the final DCO relates to updated documents. The Guide [REP3-002] as mentioned, captures version updates on a deadline by deadline basis, which includes many documents which would not be certified. The ExA considers there is a need to capture the versions of the documents and plans to be certified, in a document which is itself certified, so that future users (such as post consenting discharging authorities) can readily ensure that they are using the right version of a document.</p> <p>[REP1-041] also states that the Applicant will submit an update to the Note on Requirements and Conditions in the Development Consent Order [APP-022] at the end of the Examination to capture the latest (and final draft) version of each relevant plan or document. Including this as the overall reference could also benefit from the diagrammatic</p>	<p>documents and plans to be certified, in a document which is itself certified, so that future users (such as post consenting discharging authorities) can readily ensure that they are using the right version of a document.</p> <p>Related comments can be found at 2.2.0.2 &amp; Q2.5.1.1.</p> <p>The MMO agrees in principle that rather than updating the ES one or more certified documents could show the changes to ES chapters from when the ES was completed.</p> <p>The MMO request a version of this document prior to Deadline 7 of Examination to review and provide further comments.</p>

ExQ2	Question to:	Question:	MMO Response:
		<p>representations of the relationships between plans.</p> <ol style="list-style-type: none"> <li>1. Clarity is requested about the level of detail the Applicant is considering in its updating of [APP-022]. The ExA considers that all documents or plans would need their versions citing.</li> <li>2. The Applicant to set out how it proposes to ensure that all documents which were updated could be captured in its updating process and to comment on the desirability of this document [APP-022] being certified.</li> <li>3. Following on from the Applicant's position regarding the fixed point in time assessment provided by the ES and its position that the <i>"relevant parameters consented are set out in the DCO/DML itself, and that is what should be relied upon post consent"</i> [REP4-009, No.1], the ExA considers that the Schedule of Mitigation, which provides the link between the ES and the DCO/DML should be certified.</li> </ol>	

ExQ2	Question to:	Question:	MMO Response:
		<p>The Applicant is invited to comment.</p> <p>4. Views are requested from discharging authorities on the points above.</p>	
<b>5.2 SCHEDULE 1 PART 1: Authorised Development</b>			
Q2.5.2.1	The Applicant Natural England Marine Management Organisation	<p><b>Parameters for individual structures:</b> Should parameters for individual structures be stated explicitly in the dDCO because of ongoing concerns regarding the clarity and enforceability of plans; noting the explanation given at Deadline 2 that the EIA parameters in the dDCO do not match those in the ES because some of the infrastructure secured within the DMLs crosses between different geographical areas:</p> <ul style="list-style-type: none"> <li>• offshore disposal volumes for either total disposal or drill arisings;</li> <li>• volumes for cable protection;</li> <li>• volumes and areas of scour protection.</li> </ul>	<p>The MMO believes that individual structures should be on the face of the licence.</p> <p>Further discussions with the applicant have led to an update to the DCO/DML below provided at Deadline 4 (REP4-004):</p> <ul style="list-style-type: none"> <li>- Schedule 1, Part 3, Requirements 4(5)(4) and 11</li> <li>- Schedule 9 &amp; 10 Part 4 Condition 3 and Condition 8(1)(g)</li> <li>- Schedule 11 &amp; 12 Part 4 Condition 2</li> </ul> <p>These include the reference to two tables within the Outline Scour and Cable Protection Plan that set out the parameters for individual structures.</p> <p>The MMO request that Schedule 11 and 12 Condition 3(1)(b) is updated with similar wording to Schedule 9 Condition 8(1)(g).</p> <p>Once this is updated the MMO, on this occasion only, are content that this secures the parameters for individual structures.</p>
<b>5.3 SCHEDULE 1 PART 3: Requirements</b>			
Q2.5.3.4	The Applicant	<b>Requirement 17 Landfall Method Statement:</b>	As the works are described, there are no intertidal elements which require the approval

ExQ2	Question to:	Question:	MMO Response:
	Marine Management Organisation Historic England (HBMCE)	Requirement 17 secures approval in writing by North Norfolk District Council in consultation with the relevant statutory nature conservation body prior to commencement of Works 4C, 4B and 4A. As Works 4B and 4A (as defined in the dDCO) are seaward of MHWS does the landfall method statement also need the approval in writing of MMO in consultation with the relevant historic body (HBMCE) prior to commencement?	of the MMO. If there were to be changes in how the HDD works are developed (i.e. a short method) or other impacts on the intertidal then the MMO would wish to be consulted on any variation to this effect.
<b>5.5 SCHEDULES 9 to 13: Deemed Marine Licences</b>			
Q2.5.5.2	The Applicant Natural England	<p><b>DML Schedule 9/10 Part 4, condition 14 (1) (I):</b></p> <p>NE [REP3-021] requires the approval of the Ornithological Monitoring Plan (OMP) to be linked to a different timing requirement than 4 months prior to construction. The Applicant has proposed clarifying the wording in the IPMP to ensure pre-construction surveys are sufficient in the context of any monitoring subsequently agreed in the OMP.</p> <ol style="list-style-type: none"> <li>1. Submit the revised wording for the updated OMP.</li> <li>2. Is Natural England content?</li> </ol>	The Applicant has provided the proposed wording to the MMO which is currently being reviewed. Further discussions will be required between the applicant, Natural England and the MMO to ensure the condition is clear, robust and enforceable.

ExQ2	Question to:	Question:	MMO Response:
<b>7. Grid connection</b>			
Q2.7.0.1	The Applicant Interested Parties	<p><b>Offshore Ring Main (ORM):</b>  Ofgem, in its recently published “Ofgem decarbonisation programme action plan” [February 2020] undertakes to <i>“explore, with government and industry, options for a more coordinated offshore transmission system to connect offshore wind generation, to achieve a rapid and economic expansion of the offshore network”</i>. As a first step, Ofgem and the electricity system operator will undertake an option assessment for offshore transmission.</p> <ol style="list-style-type: none"> <li>1. Accepting that any decision relating to an ORM will be beyond this Examination’s timeframe, the Applicant to update its response [AS-024, REP4-011], to include options for any future connection into an ORM.</li> <li>2. Do IPs wish to comment further, in the light of Ofgem’s action plan?</li> </ol>	<p>The MMO welcomes the strategic idea of this proposal that could facilitate development of offshore wind projects whilst reducing the potential impacts of multiple intertidal connections.</p> <p>The MMO notes that for Norfolk Boreas the Applicant would have to submit a variation to alter their project to use any Offshore Ring Main if this was available at the time of construction, this would have to include a detailed impact assessment.</p>
<b>8. Habitats Regulation Assessment</b>			
<b>8.3 Haisborough, Hammond and Winterton SAC</b>			
Q2.8.3.1	The Applicant, Natural England, Marine	<b>Sediment disposal:</b>	The MMO is working closely with NE, the Applicant and Norfolk Vanguard to progress



ExQ2	Question to:	Question:	MMO Response:
	Management Organisation	Applicant, MMO and NE to provide update on discussions relating to the wording of a condition for sediment disposal.	some draft disposal principles (to be referenced in the DCO/DML) which will ensure similarity in particle size between clearance and disposal locations.
Q2.8.3.2	Marine Management Organisation	<p><b>Sea bed mobility study:</b> MMO to provide comments on the Applicant's hydrodynamic modelling for sediment disposal [REP1-040] that was requested at the November Environmental Matters ISH.</p>	The MMO's technical advisors have reviewed the Sea bed mobility study and are content that the information provided does not contradict the conclusions made within the ES. This will be reflected in the updated SoCG the Applicant will submit at Deadline 6.
Q2.8.3.3	The Applicant, Natural England	<p><b>Scour Protection Plan:</b> With reference to NE's response to WQ 8.12.9 [REP2-080], the Applicant and NE to update on the need for the outline Scour Protection and Cable Protection Plan to cover the HHW SAC.</p>	<p>The MMO understand that this is also related to the HHW SAC SIP condition.</p> <p>The MMO are in discussion with the Applicant and NE about the use of the HHW SAC SIP and the related condition (Schedule 11 &amp; 12 9(1)(m)).</p> <p>The MMO has concerns that if the SoS makes a decision on AEoI on the HWW SAC then the condition is not fit for purpose as it does not take into account for the Derogation process. Alongside this the Applicant has removed all sections relating to the HHW SAC from the Outline certified plans (such as the Outline Cable and Scour Protection Plan) and included this in the HHW SAC SIP document.</p> <p>The MMO is concerned that if the SoS were to make a decision (either no adverse effect or derogation route), condition 9(1)(m) could be removed from the DMLs and with this the HHW SAC SIP and all included information could be</p>

ExQ2	Question to:	Question:	MMO Response:
			<p>lost at this the consenting stage as this information is only included in the SIP document.</p> <p>The MMO is aware the Applicant will be proposing an alternative condition and document in relation to Norfolk Vanguard for this scenario. The MMO will work with the Applicant on the wording of this condition and provide comments once this is submitted into the Norfolk Boreas examination.</p>
Q2.8.3.5	The Applicant, Marine Management Organisation	<p><b>Monitoring sandwave recovery:</b></p> <p>The SoCG with the MMO [REP2-051] highlights a disagreement regarding the need for monitoring of sandwave recovery following sweeping. Applicant and MMO to provide an update on this matter.</p>	The MMO and the Applicant are in agreement that the In Principle Monitoring Plan provides an appropriate framework to agree monitoring requirements with the MMO subject to any developments or amendments pre-construction.
<b>8.4 Offshore ornithology</b>			
Q2.8.4.6	Marine Management Organisation	<p><b>As-built vs consented turbine numbers:</b></p> <p>MMO to provide update on its consideration of the Applicant's suggestion of how collision risk headroom can be taken into account in the assessment [REP4-035].</p>	<p>It is the understanding of the MMO that this is for the SoS to take into account within the HRA assessment. The MMO defer to NE in relation to HRA aspects.</p> <p>If the MMO was to conduct the in combination assessment, the MMO approach would be to discharge the obligation on the worst case consented parameters. The MMO would require comfort there was no mechanism for the elevation of the as-built figures to the consented figures.</p>

ExQ2

Question to:

Question:

MMO Response:

## 16. General and cross-topic questions

### 16.1 Environmental Statement (ES)

Q2.16.1.3

Interested Parties

**Decommissioning:**

Interested Parties are invited to set out any comments they may have on the way decommissioning would be addressed. The Project Description [APP-218] sets out the future processes, which would be in accordance with best practice, rules and legislation of the time. Requirement 14 (offshore) and Requirement 29 (onshore) secure future decommissioning plans.

The MMO acknowledges the Rochdale Envelope is large for offshore wind farms and therefore assessing the decommissioning of everything proposed to be built at this stage would be inappropriate, as there is not enough information on what final design will be built. In addition to the Offshore wind technology is changing rapidly, it would be onerous to discuss decommissioning at this stage.

The MMO agrees with the requirement to provide a plan for decommissioning closer to the time.