Historic England

PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS AMENDED) – RULE 6

APPLICATION BY MORECAMBE OFFSHORE WIND LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MORECAMBE OFFSHORE WIND FARM GENERATION ASSETS PROJECT

APPLICATION REF: EN010121

SUBMISSION DEADLINE: 26th November 2024

WRITTEN REPRESENTATION OF THE HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR ENGLAND (HISTORIC ENGLAND)

REGISTRATION ID No: 20049980

Contents

Summary

Summary

Historic England is the Government's statutory adviser on the historic environment. It is our duty under the National Heritage Act 1983 to secure the preservation and enhancement of the historic environment. This extends to sites and places in, on, or under the seabed within the seaward limits of the UK Territorial Sea adjacent to England. Our objective is to ensure that the historic environment generally, and marine and designated heritage assets especially, are fully considered in the determination of this DCO.

The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, is the Government's adviser on all aspects of the historic environment in England including historic buildings and areas, archaeology and historic landscape with a duty to promote public understanding and enjoyment. Historic England is an executive Non-Departmental Public body sponsored by the Department for Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State DCMS. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments particularly those with responsibilities for planning matters. The National Heritage Act (2002) gave Historic England responsibility for identifying sites for designation within the English area of the UK Territorial Sea (i.e. English Inshore Marine Planning Area). We also provide our advice in reference to how the historic environment is included within marine planning and licensing provisions within the Marine and Coastal Access Act 2009.

We have provided substantive pre-application advice about the scope of environmental assessment and the PEIR. We have also submitted a Relevant Representation (dated 19th August 2024). The applicant has provided an Environmental Statement with supporting appendices and other documentation with the application. We have therefore considered this information and we hereby provide detailed comments, expanding on the matters highlighted in our Relevant Representation (PINs Document Ref: RR-030).

Historic England do not object in principle to the Proposed Development and we summarise our position as follows:

i) The Environmental Statement contains a geoarchaeological review of geophysical and geotechnical data acquired for this project and Appendix 15.1 contains a very useful set of recommendations for future work, should this project gain consent.

ii) The application includes an Outline Marine Written Scheme of Investigation (WSI) as a mitigation action which should inform the production of a WSI to support archaeological assessment of further survey data acquired post-consent (should consent be obtained).

iii) The draft DCO includes a Deemed Marine Licence which includes conditions for WSIs. However, we recommend that the wording requires review to ensure implementation in the crucial post-consent and pre-construction phase to inform the planning and engineering design, and delivery of the proposed project.

1. Introduction

1.1 This Written Representation sets out the views of Historic England on the proposed Development Consent Order (DCO) application made by Morecambe Offshore Wind Ltd for the proposed Morecambe Offshore Wind Farm Project: Generation Assets.

1.2 The application explains that the size and capacity of Wind Turbine Generators (WTGs) for the Proposed Development will be determined during the final project design stage i.e. post consent, should permission be obtained, and that this Environmental Statement (ES) assess a maximum design scenario for the WTGs as a "worst case" scenario. Inter-array cables will connect the WTGs to a maximum of two offshore substations, and that electricity export to landfall on the Lancashire coast is subject to separate DCO application as transmission assets in conjunction with the Morgan Offshore Wind Generation Assets (PINs Ref: EN010136).

1.4 The submitted application includes an ES, dated May 2024, produced to satisfy the requirements of Environmental Impact Assessment (EIA) requirements, under the terms of European Union Directive 2011/92/EU (as amended by Directive 2014/52/EU)) on the assessment of the effects of certain public and private projects on the environment (EIA Directive). The EIA Directive is transposed into English law for Nationally Significant Infrastructure Projects (NSIPs) by The Infrastructure Planning (EIA) Regulations 2017.

1.5 In our Section 56 Relevant Representation (dated 19th August 2024) we noted that this development has the potential to impact the historic environment, and that this impact could be significant in relation to a number of heritage receptors and in relation to EIA policy.

2 Comments on Environmental Statement: Volume 5, Chapter 5 – Project description (Document Reference: 5.1.5) PINS Reference: APP-042

2.1 We note the explanation that a 2.5-year construction phase is anticipated and that the operation and maintenance phase could be for 35 years with a Crown Estate seabed lease for 60 years, it is therefore possible that "repowering activities" could extend the operational phase of the windfarm. We also acknowledge the use of a design envelope approach (known as Rochdale Envelope) to identify key design assumptions to produce realistic worst-case scenarios. Furthermore, that the environmental assessment retains flexibility to accommodate further refinement (should the proposed project secure consent).

2.2 Section 5.2 (Project design dnvelope), details two Wind Turbine Generator (WTG) scenarios within the Project Design Envelope (PDE):

- 35 smaller WTGs (maximum blade tip height 290m); and
- 30 larger WTGs (maximum blade tip height 310m)

2.3 The proposed development location is described as being located within eastern Irish Sea with the closest point to the English coastline 30km away. However, we are aware of the proposed Morgan Generation Offshore Wind Farm (presently in examination), which could be built to the west of the proposed Morecambe Generation Assets project and that development consent was granted for the Awel y Môr Offshore Wind Farm in September 2023, located 29km to the south of the proposed Morecambe array in the Welsh marine planning area.

2.4 Section 5.5.2 states that up to two Offshore Substation Platforms (OSPs) and section 5.5.3 described the foundation designs under consideration inclusive of:

- Gravity Base Structures (GBS);
- Multi-legged pin piled jacket foundations;
- Multi-leg suction bucket jacket foundations; and
- Monopile.

2.5 Paragraph 5.4.1 mentions the use of "mudmat foundation" in conjunction with GBS, and that the anticipated maximum seabed penetration could be 1.5m (Table 5.14), which will require preparation, as described in paragraph 5.92. For multi-leg foundations with pin piles, the maximum diameter could be 3m with 56m penetration. If multi-leg foundations with suction buckets are deployed, the maximum diameter could be 20m with 25m seabed penetration. Monopile diameter is estimated to be 12m (56m seabed penetration).

2.6 The target depth of inter-array cable installation should be between 0.5m and 3m (target depth 1.5m), and we note the detail provided in sub-section 5.6.2.3 regarding anticipated seabed clearance works to be conducted pre-installation. For example, boulder clearance and pre-lay grapnel runs prior to inter-array cable laying. It is therefore relevant that analysis is conducted of pre-commencement surveys to actively inform inter-array cable route selection to determine the proximity of cable installation to features of known or possible archaeological interest.

3. Comments on Environmental Statement: Volume 5, Chapter 6 – Environmental impact assessment methodology (Document Reference: 5.1.6) PINs Reference: APP-043

3.1 This Nationally Significant Infrastructure Project (NSIP) is subject to an EIA produced in accordance with the Infrastructure Planning (EIA) Regulations 2017. We understand that the accompanying ES should explain the predicted likely significant effects (positive and negative) and the scope for avoiding, preventing, reducing, and if possible, offsetting any identified significant adverse effects on the environment (defined as inclusive of archaeological heritage).

3.2 We appreciate the attention given to the Evidence Plan Process (Section 6.5.3) and the use of Expert Topic Groups (ETGs) as summarised in Table 6.4. We note the attention given in section 6.6.3 to mitigation and comprise "embedded" and "additional" techniques and that a range of measures that have been designed to reduce or prevent significant adverse effects arising are set out in a Schedule of Mitigation (Applicant Document Reference: 5.5; PINs Reference: App-144).

4. Comments on Environmental Statement: Volume 5, Chapter 15 – Marine archaeology and cultural heritage (Document Reference: 5.1.15) PINs Reference: APP-052

4.1 We note the attention given to EN-3 (published in November 2023) and we are aware that EN-3 (see paragraph 2.8.315) sets out that sufficient and adequate mitigation is applicable as much to known wreck (of historic environment interest)

as for discoveries that may occur when high resolution surveys are commissioned post-consent, should permission be obtained.

4.2 Table 15.2 (key parameters for assessment) the Applicant set out the following maximum design scenario:

- 35 WTGs on Gravity Base Foundations (GBFs), two OSP on GBSs, the description is noted that a GBS could have a diameter of 65m plus 10m 'disturbance' zone.

4.3 Table 15.2 describes different potential impacts during construction, operation and decommissioning, with impacts considered inclusive of jack-up vessels in reference to the described maximum design scenario.

4.4 Section 15.3.3 (Summary of mitigation embedded in design), we concur with the decision to place AEZs, either individually or in cluster configuration, as specified in Table 15.23, use of Temporary AEZs (TAEZ), as specified in Table 15.24, and micro-siting as "embedded" mitigation measures for known heritage assets. However, it is insufficient to depend on a reporting protocol system for "unexpected discoveries". It is essential that the Applicant acknowledges that reporting after impact does not mitigate harm. The function of a reporting protocol system is to facilitate rapid communication between identified parties to aid efficient decision making. In consideration of the advice provided during pre-application on this point, we highlight the attention given in Table 15.5 to the heritage policy in the published North West marine plan. In particular, differentiating between embedded (i.e. avoidance) and "offsetting" measures given that it will not be possible to "repair damage" to archaeological materials, as acknowledged by the Applicant in paragraph 15.70.

4.5 Section 15.4.2 (Data and information sources), we are aware that geophysical site characterisation survey was commissioned by the Applicant for the proposed array area and that survey data acquisition was conducted between October and November 2021 and comprised Side Scan Sonar (SSS), Multi-Beam Echo Sounder (MBES), Magnetometer and Sub-Bottom Profiler (SBP), obtained between July to October 2023. We are also aware that the professional and accredited archaeological sub-contractor responsible for analysis of the survey data determined that data was of "good quality overall" with 100% coverage for SSS and MBES. Furthermore, SBP (conducted in two phases) and magnetometer data were both considered to be "suitable" i.e. coverage and seabed penetration and identification of ferrous material >50kg respectively and therefore that "robust archaeological assessment" was possible including the identification of a "large magnetic anomaly (i.e. >100nT) (Referenced as MC22_MAG_0254, Figure 15.4). In reference to marine geotechnical survey programmes conducted to date, we appreciate that samples obtained to data have been assessed (e.g. as summarised in Table 15.8), but that further geotechnical investigations are planned to be undertaken in 2024 (paragraph 15.46).

4.6 Sub-section 15.4.4 (Historic seascape character), it is important to acknowledge that the primary purpose of Historic Seascape Character (HSC) is to provide context for heritage assets as could be located within a particular area. We concur that it is not possible to identify 'magnitude of impact' on HSC, and furthermore, the focus for attention should not be on HSC as "perceived by the public". Perception of change should be that of the Applicant in consideration of change such as through energy

transition from hydrocarbon (oil and gas production) to renewables generating electricity and in reference to other relevant ES chapters.

4.7 Sub-section 15.5.1 (Seabed prehistory), it is apparent that palaeoenvironment evidence is complex, but that the professional option is that there is potential to encounter preserved artefacts and archaeological material in the proposed development location. However, in reference to Table 15.14 and the identified Quaternary sedimentary sequence, it is apparent that there could be some archaeological potential associated with Units 1 and 2. The recommendation is noted that further investigation and geoarchaeological analysis could help to address present "gaps in understanding" (paragraph 15.121). It is therefore relevant that any outline WSI prepared for this project sets out research questions as could be addressed by any further programme of analysis with measures identified to support corroboration with shallow seismic geophysical data.

4.8 Sub-section 15.5.2 (Maritime and aviation archaeology), 21 anomalies of potential archaeological interest were identified within the proposed development area; of these 4 were considered to have "medium" potential, none of which correspond with any UKHO or National Record of the Historic Environment records (NRHE) and 17 "low" potential anomalies. Furthermore, it is explained that only two UKHO records are spatially identified within the proposed array area and no corroboration was possible with geophysical data. We also note the conclusion that given the review of both desk-based sources of information and interpretation of geophysical survey data acquired to date, the potential (i.e. risk of encountering presently unknown archaeological materials) is considered to be "low". However, areas of mobile sand waves could contain presently undetected buried material and that higher resolution geophysical data acquisition campaigns could also reveal the presence of presently unknown sites of possible archaeological interest (paragraph 15.151).

4.9 Sub-section 15.5.3 (Coastal heritage assets), we note the reference made to a high-level screening assessment and the focus directed at heritage assets "…with views out to sea or which have a relationship to the sea which forms part of their setting…" (paragraph 15.162). We note that 73 heritage assets were thus identified, as described in paragraph 15.163, and that in reference to visual assessment techniques, 37 were selected for detailed assessment which were thought could be affected by the proposed development.

4.10 Sub-section 15.5.4 (Historic seascape character), it is not entirely clear why this subject matter is addressed in two separate sub-sections in this chapter (see also 15.4.4). In reference to Table 15.22 we do not agree with the attempt to identify public perception or how it is thought the project could accommodate change in reference to broad character type e.g. fishing. It is apparent that given identified techniques of dredging and bottom trawling as character sub-types, this proposed development will change identifiable historic seascape character. However, given that historic seascape character is only designed to provide context and in consideration of the assessment of records and survey data presented in this chapter (as described above), we have no further comment to offer.

4.11 Section 15.6 (Assessment of effects), It is apparent that the overall conclusion of no significant effects arising from Morecambe Generation Assets during construction, operation and maintenance or decommissioning phases is predicated on implementation of embedded mitigation measures (e.g. AEZs). However, we appreciate the recognition of adaptive mitigation, as alluded to in paragraph 15.178 and the importance of archaeological analysis of high-resolution geophysical data

undertaken for the purposes of UXO which could reveal the presence of presently unknown archaeological sites. In reference to the identified impacts, we offer the following comments:

- Construction Impact 2 (15.6.1.2) and Operations and Maintenance Impact 2 (15.6.2.2): Direct impact to potential heritage assets – we appreciate the identification of additional mitigation to address potential to have major adverse effects (paragraph 15.189) and identification of residual effects (e.g. as assumed in paragraph 15.202);

- Operations and Maintenance Impact 5 (15.6.2.5): Changes to the setting of coastal (terrestrial) designated heritage assets – we focus our attention on the identified Scheduled Monuments and Listed Buildings I and II* such that we have no further comment to offer regarding the conclusion offered in paragraph 15.240 ("…no change to the significance of the designated heritage assets would occur to due to changes in their setting.");

- Decommissioning Potential effects during decommissioning (15.6.3) – on the basis of the information supplied at this time we are minded to concur with the impact assessment conclusions determined by the Applicant;

- Cumulative effects (15.7) – we are minded to concur with the assessment set out in Table 15.25 e.g. "minor adverse" for Construction and Operations and Maintenance Phases "Impact 2";

- Cumulative assessment (15.7.3.1) – the Project and Transmission Assets (combined assessment) we appreciate the attention given by the Applicant to the separate DCO application for Morgan and Morecambe Offshore Wind Farms: Transmission Assets and consideration of impact at all identified project phases, as summarised in Table 15.27, and we have no further comment to offer;

- Interactions (15.10) – we note the assessment provided in Tables 15.29, 15.30 and 15.31 and the inclusion of Impact 4 ("Impacts to the setting of marine heritage assets and historic seascape character"), however, while it is correct to include setting of heritage assets, this should not be conflated with any consideration of change as related to interpretation of historic seascape character.

4.12 Assessment summary – we agree with the statement made in paragraph 15.300 and 15.301. However, in paragraph 15.302 while we appreciate the reference made to the approach set out in the Outline OWSI, it is essential that all parties understand that should consent be secured for this proposed development, that WSIs are produced from the "outline" that are tailored and specific to each subsequent phase of delivery.

5 Comments on Volume 5, Appendix 15.1: Archaeological Assessment of Geophysical and Hydrographic Data (Document Reference: 5.2.15.1) PINs Reference: APP-075

5.1 It is relevant to highlight that proposed array area is adjacent to the South Morecambe Gas Fields, which are expected to cease production in 2027 and that the selection of this area was to demonstrate how this proposed project could co-

exist within a previously developed seabed area, as described in Section 4 (Existing infrastructure). For example, the fact that two gas platforms are present within the proposed array area; one active and one decommissioned. However it is worth noting that "…there is a notable absence of data within an 850 to 900 m radius of these structures" (paragraph 5.1.3).

5.2 Sub-section 5.3 describes data quality and limitations and that Side Scan Sonar (SSS) data was considered to be "generally of good quality" and for Multi-Bean Echo Sounder (MBES) that "…data density is good", for Sub-Bottom Profiler (SBP) "…data was of good quality" with seabed penetration of 50m. The observation that the proposed array area "…is characterised across a significant area by mobile sands, manifesting as sandwaves of various sizes" (paragraph 5.3.6) is a relevant factor in the interpretation of risk.

5.3 Overall, it is stated that the geophysical survey data made available for analysis was of an "…appropriate specification, coverage, and quality, to undertake a robust archaeological assessment to inform the EIA process" (paragraph 5.3.11). It was important to see the action taken to assess and analyse each data type and also conduct a combined assessment of primary data acquired for this proposed project and other relevant desk-based sources of available data.

5.4 Section 5.6 details the review of geophysical and geotechnical information and the production of a "ground model" as described in paragraph 5.6.3

5.5 Section 6 states that a total of 38 anomalies of potential archaeological interest were identified within the wider archaeology study area (as illustrated in Figure 8) with 6 considered to be of "medium potential".

5.6 In the exercise to cross-reference between geophysical data only one magnetic anomaly correlated directly with an anomaly identified as of archaeological potential. However, it was acknowledged this was likely to be due to magnetometer data line spacing (as illustrated in Figure 18). The identification, at this stage of other potential anomalies, as well as UKHO and NHRE records is relevant, as subsequent high-resolution survey to inform any foundation positioning and dredging requirements will help to refine the available information. We also remain aware that other anomalies of possible archaeological interest might presently be concealed within mobile sedimentary bedforms. The attention given to palaeolandscapes in Section 10 was useful, in particular the ongoing research regarding the Holocene transgression and the corresponding debate about geoarchaeological potential, as expanded upon in Section 10.7 although the consensus seems to be that understanding the timing of Holocene transgression continues to be a key research question.

6 Comments on Volume 5, Annex 15.5 Setting assessment (Document Reference 5.2.15.3) PINs Reference: APP-077

6.1 We understand that this document presents the results of the assessment of potential impacts and effects arising from changes which could be considered relevant to the settings of identified terrestrial historic assets in the English coastal zone. Out of the high number of designated assets on the coast and within the selected buffer zone, 73 are identified as requiring further assessment. These include one World Heritage Site (WHS), 13 Scheduled Monuments (SMs), 3 Registered Parks and Gardens, 7 Grade I Listed Buildings (LBs), 9 Grade II* LBs,

27 Grade II LBs and 13 Conservation Areas (Cas). However, in consideration that Historic England's statutory remit is focussed on Grade I and II* assets, we will leave further comment on other identified heritage assets to the relevant local authorities.

6.2 There is quite a lot of duplication among the highly graded assets listed, due to the inclusion of dual-designated sites (i.e. both Scheduled and Listed) which are categorised under both headings. For example, individual assets are specifically identified in paragraph 15.239, such as three Grade I listings at Heysham cover features which are included in the scheduling of "St Patrick's early Christian chapel and associated cemetery, Lower Heysham" (NHLE 1020535), while a Grade I listed building at Cockersand is also included in the scheduling of "Cockersand Premonstratensian Abbey" (NHLE 1018919), yet they are all listed as individual designated heritage assets.

6.3 We appreciate that most of the highly grade heritage assets identified and assessed are a considerable distance away from the array area of the proposed Wind Farm (Cockersand, for example, is 43km away) and there are already numerous turbines visible in the distance from Blackpool, Heysham and Cockersand. In the circumstances, we don't see any reason to question the assessment carried out, or its conclusion as set out at paragraph 15.240 such that there is no change to the significance of the designated heritage assets (as relevant to Historic England, as explained above) would occur due to anticipated changes in their setting.

7 Comments on Outline offshore written scheme of Investigation for archaeology, Volume 6 (Document Reference 6.10) PINs Reference: APP-154

7.1 We agree that this Outline offshore WSI should be updated to produce a "final" WSI to be applied post-consent, should permission(s) be secured, in accordance with NPS EN-3. This document will also require monitoring and review over the lifetime of the proposed development project and that specific tasks, relevant to the WSI will require method statements, produced by a professional retained archaeological advice service (as described in section 2.1) and subject to consultation with Historic England prior to formal approval.

7.2 We concur with the approach to implementing investigation and mitigation as described in sub-section 2.3, in particular, highlighting the importance of the Post-application/pre-commencement stage and the identification of archaeological objectives. We also concur with the process of consultation to take work forward through iterative WSIs, should consent be obtained.

7.3 We appreciate that both geophysical and geotechnical data analysis has informed the production of the outline WSI to provide an informed position about seabed prehistoric evidence potential.

7.4 Section 4.2 (Summary of mitigation) is useful in that brief mention is made about "acquisition of high resolution geophysical data, to be acquired post-consent" in Table 4.1 it is not immediately apparent why Section 4.3 (Impact assessment summary) is included as this duplicates information provided elsewhere in the ES and is not specifically relevant to the core purpose of a WSI.

7.5 Section 6 (Methodology for further site investigation) provides key information within a WSI as should be delivered by a professional, accredited and experienced retained archaeological advice service commissioned by the Consent Holder,

should permission be obtained. We also concur with the subsequent consultation process that should take place with Historic England prior to any formal "approval" by the MMO as the competent authority. However, we appreciate that follow-on geotechnical survey is already planned (as mentioned in paragraph 98) for which a Method Statement is in place, as explained within section 10 of this outline WSI, and that subsequent analysis will support a specified research hypothesis to produce a Quaternary (sedimentary) deposit model utilising Historic England published guidance.

7.6 We appreciate the attention given to direct archaeological investigation by diver or Remotely Operated Vehicle (ROV), particularly as ROV is likely to be used to assist UXO investigations. We also concur with the use of AEZs and TAEZs as the primary mechanism for in-situ protection of materials of possible or known archaeological interest (as illustrated in Figure 7.1).

7.7 The explanation provided about the design and implementation of a reporting system for unexpected discoveries of archaeological interest (Section 7.4) is sufficiently detailed to support subsequent application; we also appreciate the detail provide regarding data management, technical reporting, post-fieldwork assessment, publication and archiving.

8 In Principle Monitoring Plan (IPMP), Volume 6 (Document Reference 6.4) PINs Reference: APP-148

8.1 While note the inclusion of Section 2.9 (Offshore archaeology and cultural heritage) and agreement that the anticipated effects of the proposed development are reduced to a minor adverse residual significance given assumptions made about embedded mitigation and, crucially, the requirement for further interpretation/assessment of geophysical and geotechnical data post-consent, should consent be obtained. We therefore agree with principal mechanism described "…for delivery of monitoring for offshore archaeology and cultural heritage is through (and as conditioned in the DML) the Offshore Written Scheme of Investigation (OWSI)…" and the referenced Outline OWSI with any subsequent method statements to be subject to consultation with Historic England.

9 Draft Development Consent Order, Volume 3 (Document Reference: 3.1), PINs Reference: APP-012

9.1 All advice is offered here without prejudice to any decision as might be made whether or not to grant consent for this proposed development.

9.2 Schedule 6 Deemed marine licence under the 2009 Act – Morecambe Offshore Windfarm Generation Assets

Part 1 (Licensed Marine activities) requires amendment:
1(4)(b) the address of Historic England should be amended to: Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

9.3 Part 2 (Conditions): Pre-construction plans and documentation; It is essential that post-consent and pre-construction archaeological evaluation informs delivery plans to avoid in-situ archaeological sites, as could be revealed through assessments

conducted and completed post-consent and pre-construction. We would therefore expect a condition to be applied to that effect in the draft Deemed Marine Licence.

9.4 Condition 9(1)(f) to be revised to:
“An offshore written scheme of investigation for archaeology in relation to the Order limits, which must accord with an outline marine written scheme of investigation produced in consultation with the statutory historic body at least 12 weeks prior to the commencement of any survey work unless otherwise agreed by the MMO; to include—"

10 Historic England Written Representation: Conclusions

10.1 Historic England do not object in principle to the Proposed Development.

10.2 There is an accepted risk that this project could encounter presently unknown elements of the historic environment which could be subject to a high level of harm.

10.3 It is apparent from the description provided about the maximum design scenario and the foundation designs under consideration that post-consent evaluation will be essential (subject to securing authorisation) and that such survey acquisition and data analysis must occur in a timely way to inform any pre-construction design finalisation.

10.4 The draft DCO includes (draft) Deemed Marine Licences which include conditions for WSIs. However, we recommend that the wording is given attention to ensure implementation in the crucial post-consent and pre-construction phase to adequately inform the planning and engineering design, and delivery of the proposed project.