

# MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Technical engagement plan appendices Part 1 (Appendix A)

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April 2024

F01



Image of an offshore wind farm

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

**Document status**

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Prepared by:

**RPS**

Prepared for:

**Morgan Offshore Wind Ltd.**

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## Appendix A: Evidence Plan Steering Group

### A.1. Steering group overview

**Table A.1: Associated minutes from Steering group consultation materials.**

Date	Consultation	Information provided
16 November 2021	Steering group meeting 1	Meeting minutes (A.2.1)
13 December 2021	Steering group meeting 2	Meeting minutes (A.3.1) Response from Natural England regarding the meeting minutes (A.3.2)
14 December 2021	Steering group meeting 2.5	Meeting minutes (A.4.1)
20 July 2022	Steering group meeting 3	Meeting minutes (A.5.1) Morgan and Mona LSE Screening Methodology Paper for Consideration (A.5.2) Response from NRW regarding meeting minutes and LSE Screening Methodology Paper (A.5.3) Response from JNCC regarding LSE Screening Methodology Paper (A.5.4)
14 February 2023	Steering group meeting 4	Meeting minutes (A.6.1)
29 June 2023	Steering group meeting 5	Meeting minutes (A.7.1) Response from Natural England regarding the meeting minutes (A.7.2) Morgan and Mona updated HRA Methodology Note (A.7.3)
17 October 2023	Steering group meeting 6	Meeting minutes (A.8.1) Response from Natural England regarding the meeting minutes (A.8.2) Response from the Planning Inspectorate regarding the meeting minutes (A.8.3) Response from Cefas regarding the meeting minutes (A.8.4) Response from JNCC regarding the meeting minutes (A.8.5) Response from NRW regarding the meeting minutes (A.8.6)

## **A.2. Steering group meeting 1**

### **A.2.1 Meeting minutes**

# MINUTES OF MEETING



Security Classification: Project External

Partners in UK offshore wind

**MOM Number** : 20211116\_Morgan and Mona EP\_EP Steering Group **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group Meeting 1

## MINUTES OF MEETING

**MEETING DATE** : 16/11/2021

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : ██████████ (RPS)

**ISSUED BY** : ██████████ (RPS)

### PERSONS PRESENT:

- ██████████ – bp (LH)
- ██████████ – bp (MP)
- ██████████ – RPS (AB)
- ██████████ – RPS (KL)
- ██████████ – RPS (ST)
- ██████████ – NRW (LR)
- ██████████ – NRW (KN)
- ██████████ – Natural England (MK)
- ██████████ – Natural England (LB)
- ██████████ – Natural England (AuB)
- ██████████ – Natural England (EH)
- ██████████ – MMO (JS)
- ██████████ – MMO (SJ)
- ██████████ – JNCC (JW)
- ██████████ – Planning Inspectorate (RH)

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1.	<b>Introductions (presented by KL)</b>  RH- On behalf of the Planning Inspectorate I will take high level notes for the meeting and record any section 51 advice.		

<p>2.</p>	<p><b>About the project</b> (presented by LH)</p> <p>bp are working with EnBW to develop the Morgan and Mona offshore wind farms as two separate projects. These sites were awarded as part of the The Crown Estate’s Round 4 offshore wind leasing round. Currently they are at preferred bidder status. The intention is for both projects to be developed as fixed bottom offshore wind farms. They will be developed on similar but slightly staggered timescales and will be under separate consent applications. The Mona project is aiming to be operational in 2028 and the Morgan project is aiming for to be operational a year after.</p> <p><b>Project context</b></p> <p>The project names have changed from Yellow North to Morgan and from Yellow South to Mona.</p> <p>Mona is mostly within Welsh offshore waters and is currently anticipated to make grid connection in Wales, if a radial grid connection is granted, although the project is waiting for a confirmed grid connection offer from National Grid. Morgan is within English waters and is anticipated to make grid connection at a north-west English site, although grid connection location is to be confirmed. At the moment the applicant is awaiting a decision on the Offshore Transmission Network Review which will inform the grid connection for both projects.</p> <p>Both Mona and Morgan projects are targeting the 2025 CfD round.</p> <p><b>Key Dates</b></p> <p>Both projects are currently at pre-scoping stage.</p> <p>The scoping reports for both projects are to be submitted in March 2022. The intent is to have each project submission offset by a week as per the Planning Inspectorate’s preference.</p> <p>The applicant is currently undertaking pre-scoping engagement including local authority engagement. Throughout 2022 the applicant will progress with consenting and both offshore and onshore surveys, noting that. the applicant has already commenced overwintering bird surveys on both projects.</p> <p>The applicant has kicked off a maritime navigation engagement forum this week.</p> <p>The applicant aims to publish the Preliminary Environmental Information Report (PEIR) towards end of next year with formal consultation scheduled for early 2023. The Mona Development Consent Order (DCO) application is currently planned to be submitted in October 2023 and the Morgan DCO planned for January 2024.</p>		
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<p>3.</p>	<p><b>Evidence Plan process</b> (presented by KL)</p> <p>The Evidence Plan (EP) process has been developed following the Planning Inspectorate and Defra guidance. The applicant has also considered draft guidelines provided by Natural England <sup>1</sup>.</p> <p>The EP has historically been HRA focused however in line with recent best practice, the applicant proposes to extend this to include the EIA process for ecology topics, including designated sites such as SSSIs and MCZs.</p> <p>The applicant is proposing to carry out a single EP process for both projects. The applicant has received some comments on use of a single EP for both projects. The projects will have separate agreement logs to account for the differences between the projects ahead of the DCO applications. There are several reasons for this approach:</p> <ul style="list-style-type: none"> <li>• the projects are being progressed together so logistically it makes sense to progress the EP as one.</li> <li>• Cumulative impacts can be considered together across the projects.</li> <li>• There are also resourcing benefits e.g., for Expert Working Groups (EWGs). It reduces the meeting burden.</li> </ul> <p>Meeting minutes will also note any differences between the projects.</p> <p>RH - RH can see the logic in having one EP process. However, what happens if one project has a significant issue in a particular topic and this takes up all the discussion time at the expense of the other project/topics?</p> <p>KL - Historically where this has happened before the issue has been separated into separate meetings to avoid taking up attendees time when the discussion may not be relevant to all. As the projects are so close to each other, the two projects will be considered together in terms of cumulative assessments.</p> <p>RH - As long as the flexibility is there is accommodate that. The EWG should not focus on only the key issues; other issues should be considered which need discussion and information collected.</p> <p>KL - It is understood that flexibility is important. The applicant can plan out the required meetings at this stage, but the applicant acknowledges that flexibility is required and if necessary, further topics will be discussed in separate meetings.</p>		

<sup>1</sup> Natural England (2021) Expectations for pre-application engagement and best practice guidance for the evidence plan process.



<p>4.</p>	<p><b>Roles and responsibilities</b> (presented by KL)</p> <p>The EP process is led by the applicant. The responsibility for updating the EP is with the applicant, with feedback from the relevant consultees.</p> <p>KL will chair the EWG and steering groups. ST will act as secretariat. KL and ST are to be included on all correspondence.</p> <p>One of the comments that the applicant recieved on the EP Template was that roles and responsibilities for each stakeholder should be included in the EP, to clearly define the mandate of each organisation within each jurisdiction. The applicant will update the EP based on this comment.</p> <p>The applicant has put together a broad plan for engagement with the steering group- noting that this is subject to progress based on how the project progress.</p>	<p>RPS to update the EP to include the roles and responsibilities from each organisaiton.</p>	<p>17/12/21</p>
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	Each organisation to identify who their point of contact for each EWG. The first EWG will be early next year.	to identify who their point of contact is for each EWG outlined in the EP.	
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<p>7.</p>	<p><b>Progress to agreement</b> (presented by KL)</p> <p>The EP process is iterative. The applicant will agree as much as possible during pre-application phase. Meetings will be held at key stages for each topic e.g. where a key section of data has been analysed or preliminary modelling undertaken. The idea is for consultees to provide feedback as early as possible.</p> <p>MK – In terms of review time for consultees in the EP, these general timescales are fine. However sometimes two weeks review time might not be sufficient for a large report. MK advised that consultees need to be aware of what the material is that is that they are being asked to look at. When documents are circulated it would be worth setting out what their purpose is e.g. are they for information only or does the applicant want specific comments. If consultees are sent a working draft of a document and the intention is to present an updated one at the EP meeting, then the consultees should be informed when the first draft is provided to avoid confusion and so they are aware of the level of detail required for the review.</p> <p>KL - The applicant will provide clarity on the content and purpose of any information shared.</p> <p>KN – Similar comment to MK above. Two weeks review time might not be sufficient for a large report. An explanation of where the information is coming from is useful and timelines for documents to be provided would also be useful.</p> <p>KL - In terms of written feedback, it would be great if these could be provided at the time of the relevant meeting, although this would not be expected. The applicant would not expect all advice to be given during the meetings. If documents are provided 2 weeks in advance of meetings and written responses can be provided 2 weeks after the meeting, there is an effective 4 week turnaround for written comments. However, specific timescales for written feedback will be tailored for each meeting or deliverable during the Evidence Plan process to ensure deadlines are realistic.</p> <p>LR - Agree with previous comments re. review times. To add, in the EWGs there is no mention of seascape, landscape and visual impact assessment (SLVIA), water quality or WFD. Water Quality and WFD may be incorporated into other areas, but useful to understand where SLVIA will be considered?</p> <p>KL - In terms of SLVIA., the applicant noted that this topic was included in the draft guidance that NE (see footnote <sup>1</sup>) circulated. The applicant is of the view that keeping the EP limited to the ecological receptors is more appropriate. The applicant has discussed internally, and decided that a line needs to be drawn around the remit of the Evidence Plan.. By including SLVIA the remit could become too large. These topics will be covered as part of the wider EIA assessment, scoping and PEIR consultation.</p>	<p>RPS to have internal discussion regarding the inclusion of SLVIA in the EP process</p>	<p>03/12/21</p>
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	<p>RH - On other projects it is not uncommon for these topics to be covered in the Evidence Plan EWGs as wider discussions are had. The applicant might want to have particular sessions on these topics.</p> <p>KL - The applicant acknowledges that there is some overlap between onshore ecology and SLVIA, it will be considered again internally.</p> <p>RH - The EP process was developed with the Habitats Regulations in mind. Recently the remit has extended out to other significant topics. This is something that has taken up examination time previously.</p> <p>AB - The applicant is carrying out a similar process for other topics outside the EP process e.g. shipping and navigation, aviation and onshore topics. The applicant plans to retain the original remit of the EP and for other topics we are using road maps where applicable.</p> <p>EH – Suggest these roadmaps are captured in a ways of working document</p> <p>RH - RH advised that others beyond the local authorities included in those road maps may be interested in SLVIA.</p>	<p>The applicant to discuss engagement roadmaps internally and feed back to the EP Steering Group</p>	<p>17/12/21</p>
<p>8.</p>	<p><b>Next steps</b> (presented by KL)</p> <p>AuB - NE would generally provide the issues and comments log to the Planning Inspectorate along with the advice on application.</p> <p>KL - Can the issues and risks log be provided during the pre-application consultation? This might be useful to sit alongside the Statements of Common Ground (SOCG).</p> <p>MK - This is something that has been started recently, for East Anglia One offshore windfarm onwards. MK will think about how this can be provided in advance. There should not be any surprises as issues will be discussed in the EWG.</p> <p>RH – While it is important that the SoCG outlines what has been agreed (i.e. common ground) the key to these are that the areas of divergence between the stakeholder and the applicant are clearly set out.</p> <p>MK - In the figure provided in the EP, it looks like there is a compressed timeline between the PIER and the DCO application. This is a challenging timescale. PEIR consultation can throw up a lot of issues. Compressed timelines at this stage have resulted in projects looking at longer timescales for the DCO application. This is a significant step.</p> <p>KL - This is a presentation issue. Late 2022 is the PEIR submission timescale and autumn 2023 for DCO application of the first project.</p>	<p>MK to provide an example risk and issues log and a Statement of Common Ground</p>	<p>Complete</p>
<p>9.</p>	<p><b>Close of meeting</b></p>		

## **A.3. Steering group meeting 2**

### **A.3.1 Meeting minutes**

# MINUTES OF MEETING



Security Classification: Project Internal

**MOM Number** : 20211213\_Morgan and Mona EP\_EP Steering Group **REV. No.** : F01  
**MOM Subject** : Morgan and Mona Evidence Plan Steering Group Meeting 2 - Session 1

## MINUTES OF MEETING

**MEETING DATE** : 13/12/2021  
**MEETING LOCATION** : Microsoft Teams  
**RECORDED BY** : [REDACTED] (RPS)  
**ISSUED BY** : [REDACTED] (RPS) / [REDACTED] (RPS)

### PERSONS PRESENT:

- [REDACTED] – bp (LH)
- [REDACTED] – bp (MP)
- [REDACTED] – bp (WD)
- [REDACTED] – Wood (LG)
- [REDACTED] – RPS (CR)
- [REDACTED] – RPS (NS)
- [REDACTED] – RPS (KL)
- [REDACTED] – RPS (ST)
- [REDACTED] – Natural England (MK)
- [REDACTED] – Natural England (AuB)
- [REDACTED] – Natural England (EH)
- [REDACTED] – MMO (JS)
- [REDACTED] – MMO (SJ)
- [REDACTED] – JNCC (JW)
- [REDACTED] – Planning Inspectorate (GB)
- [REDACTED] – Planning Inspectorate (HT)
- [REDACTED] – Environment Agency (LL)

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1.	<p><b>Introduction</b></p> <p>KL- This meeting is to introduce the cable route study for Morgan and Mona, to procure high level feedback on the cable routing process and to identify any red flags. It is not the Applicant’s intention to provide the full slides following the meeting, as per the email from KL on 10-Dec-21. Further information will be provided, and more detailed consultation will take place next year when the projects have their grid connections.</p> <p>We will also be holding this meeting tomorrow with NRW, who were unable to attend today.</p>		



	<p>GB - On behalf of the Planning Inspectorate I will take high level notes for the meeting and record any section 51 advice.</p>		
<p>2.</p>	<p><b>Overview of the Projects</b> (Presented by MP)</p> <p>bp are working with EnBW to develop the Morgan and Mona offshore wind farms as two separate projects. These sites were awarded as part of the The Crown Estate’s Round 4 offshore wind leasing round. Currently they are at preferred bidder status. The intention is for both projects to be developed as fixed bottom offshore wind farms. They will be developed on similar but slightly staggered timescales and will be under separate consent applications. The Mona project is aiming to be operational in 2028 and the Morgan project is aiming to be operational a year after.</p> <p>At the moment the applicant is awaiting a decision from the Offshore Transmission Network Review (OTNR) which will inform the grid connection for both projects.</p> <p><b>Key Dates</b></p> <p>Both projects are currently at pre-scoping stage.</p> <p>The scoping reports for both projects are planned to be submitted at the end of March 2022. The intent is to have each project submission offset by a week as per the Planning Inspectorate’s preference.</p> <p>The applicant is currently undertaking pre-scoping engagement including local authority engagement. Throughout 2022 the applicant will progress with consenting and both offshore and onshore surveys.</p> <p>Local authority engagement and fisheries engagement have begun. The applicant has also kicked off a maritime navigation engagement forum.</p> <p>The applicant aims to publish the Preliminary Environmental Information Report (PEIR) towards the end of 2022 with formal consultation scheduled for early 2023. The Mona Development Consent Order (DCO) application is currently planned to be submitted in October 2023 and the Morgan DCO planned for January 2024.</p> <p><b>Evidence Plan process</b> (presented by KL)</p> <p>The Evidence Plan (EP) process has been developed following the Planning Inspectorate and Defra guidance. The applicant has also considered draft guidelines provided by Natural England <sup>1</sup>.</p> <p>The EP has historically been HRA focused however in line with recent best practice, the applicant proposes to extend this to include the EIA process for ecology topics, including designated sites such as SSSIs and MCZs.</p>		

<sup>1</sup> Natural England (2021) Expectations for pre-application engagement and best practice guidance for the evidence plan process.

	<p>The applicant is proposing to carry out a single EP process for both projects. The applicant has received some comments on use of a single EP for both projects. The projects will have separate agreement logs to account for the differences between the projects ahead of the DCO applications. Meeting minutes will also note any differences between the projects.</p> <p><b>Roles and responsibilities</b> (presented by KL)</p> <p>The EP process is led by the applicant. The responsibility for updating the EP is with the applicant, with feedback from the relevant consultees.</p> <p><b>Evidence Plan Steering Group</b> (presented by KL)</p> <p>The purpose of the Evidence Plan Steering Group is to monitor progress of the EP. Meetings will provide key project updates and will include an update on timescales to ensure resourcing during these periods are managed.</p> <p>The EP Steering Group will guide and inform the EP process. The group will meet at key milestones during the project programme for Mona and Morgan. A meeting is planned for February/March 2022 when the Point of Interconnection (POI) for the projects are known, to provide detailed information on the cable route selection study. An additional meeting is planned for April/May 2022 to coincide with the provision of the Scoping Opinion.</p> <p>The Environmental Agency (EA) has been included in this Steering Group meeting and the next steering group meeting as a key onshore stakeholder with an interest in the cable routing study. Otherwise, they will be included in the onshore ecology EWG.</p> <p><b>EWG</b> (presented by KL)</p> <p>Remits will be tweaked for each EWG to make it specific for each topic e.g. approach to underwater noise modelling for marine mammals. The EP will be updated and circulated prior to the first EWG.</p> <p>Broad approach to EWGs:</p> <ul style="list-style-type: none"><li>• Information circulated to EWG minimum 2 weeks ahead of meeting.</li><li>• Meeting is held with attendees prepared to comment on materials provided.</li><li>• Full meeting minutes will be taken, and agreement logs will be compiled where matters are agreed, and after each meeting the minutes and agreement log will be circulated and then agreed. The agreement log will be updated and appended to the DCO application.</li></ul> <p>Consultation on the WFD will be taken outside of the EPWG process through the pre-application phase as part of scoping and section 42 consultation. If required, it can be discussed in the EWGs, with MHWS being the limit between offshore and onshore EWGs, however at the moment the Applicant considers that it should be adequately addressed through consultation.</p>		
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	<p>will fall away once there is a decision on the POIs by National Grid. The purpose of this meeting is to introduce the cable routing study, to illustrate the search areas and indicative routes and request high level feedback on any particularly sensitive receptors and the approach to the cable route study. We are not requesting detailed feedback on the routes at this time.</p>		
<p>3.</p>	<p><b>Cable Routing Study</b> (presented by LG)</p> <p>The cable routing study is a technical GIS data driven study. The study looked at the six POIs and considered a number of options for each POI. The aim was to find technically feasible and the least environmentally constrained routes. It was not possible to avoid all constraints, but the study used a number of guiding principles. The site selection for the array was undertaken previously for the round 4 application processes. There will always be a substation within the array, and this is where the cable route selection process started from. There are a number of possible landfall location options for each POI. These projects might have a large variety of landfall types due to the variation in the coastline topography in this area. Onshore cable routing will be installed to the onshore substation before the cable provides power to the national grid. The study did not compare POI against POI as the choice of POI will be driven by the National Grid.</p> <p><b>Guiding principals</b></p> <p>The project has taken several guiding principals into account during the cable route selection process:</p> <ul style="list-style-type: none"> <li>• The Crown Estate Cable Route Protocol (2019).</li> <li>• Holford Rules.</li> <li>• Natural England and JNCC advice for offshore cabling for Round 4 projects.</li> <li>• Natural Resources Wales advice for offshore cabling for Round 4 projects.</li> <li>• Design for community.</li> </ul> <p>The Holford rules have been considered with the assumption that all cables will be buried wherever possible. This is for the whole length of cable, onshore and offshore. No pylons have been considered for this project. Trenchless technologies will be used where required e.g. HDD underneath roads.</p> <p>The NE/JNCC advice on the mitigation hierarchy has been considered by minimising interaction with nature conservation designations. Where sites cannot be avoided, the study has tried to find the shortest overlap possible between the cable route and the designated sites. However, in some cases there have been other constraints which have meant that the shortest route across the designated site was not feasible.</p> <p>The Project design principals are designed for communities, they are technical design considerations to allow the project to cause as little disruption as possible. Urban areas have been excluded for the cable route selection study. Proximity to residences and other developments has also been considered for the substations.</p>		

	<p>Substations will be as close to the POI as possible however they may need to be a few km away due to other constraints e.g. roads.</p>		
<p>4.</p>	<p><b>Site selection process</b> (presented by LG)</p> <p>The Applicant started the cable route selection study with very wide search areas. Constraints were categorised as hard or soft constraints. Hard constraints were no-go areas e.g. offshore platforms, aggregate areas and urban areas. The constraints were all mapped to exclude hard constraints and to understand the distribution of soft constraints. This was used to find the cable routes of least constraint. Landfall and substation location options were investigated by sending people out to these locations and taking detailed notes e.g. the state of the coastal defences, any other developments that are not visible from satellite imagery etc. The constraints were weighted to give a greater weighting to the constraints that have a greater bearing on the decision making process. Spatial mapping was used to interrogate the constraints e.g. to measure the length of a cable route through specific constraints. This enabled one route to be compared against another and each route was scored against each constraint. This gives each route option a ranking on how it compares against the other options therefore allowing identification of the preferred route. Reasonable alternatives have also been presented as we are looking for very early feedback and will be looking for more detailed feedback when the POI for each project is known. It will be possible to go back to the mapping stages of the selection study following stakeholder feedback.</p>		
<p>5.</p>	<p><b>Identified constraints</b> (presented by LG)</p> <p>Each POI has several landfall options, except Bodelwyddan, which has only one landfall option. There are SPAs around the entire North Wales and English coast in this area therefore it has been impossible to completely avoid them. The Flyde MCZ blocks the coast in front of the Penwortham POI therefore the shortest route through the MCZ has been used. However, a detailed look at the distribution of the designated benthic habitats within the MCZ will be done of the POI chosen by NG and this may identify a different route as being the one least constrained. The Connah’s Quay route goes through the narrowest point of the Dee Estuary SAC. In some places, there are multiple designations for the same habitats, however these have been considered separately.</p> <p>The northern indicative route for Kirkby goes through a nature reserve, this is designated for its dune system. This coastline is very constrained with large urban areas and Ministry of Defence (MOD) areas. The only open space is designated. This landfall is not the only option for this POI and it is understood that going through this designation is not ideal; the Applicant is open to consultation and consideration for this location if it becomes the POI for Morgan.</p> <p>The routes have also avoided other operational and round 4 projects e.g. the Cobra project. Consultation will be undertaken with those</p>		

	<p>developers. There is also a large amount of oil and gas activity to the north of the Cobra project.</p> <p>The Wylfa POI is adjacent to the Wylfa power station. The coastline in this area is designated as an AONB. The AONB has a gap where the power station is, therefore the indicative route at this location does not interact with the AONB. However, it has been given due consideration as any development would be visible from the AONB.</p>		
<p>6.</p>	<p><b>Questions</b></p> <p>MK- All of these routes have some potential environmental impacts and/or have significant constraints. Thinking about the mitigation hierarchy, is there any consideration of reducing impacts by taking a joint cable to shore for the two projects?</p> <p>LH- This is something we have considered, however it has not been taken forward due to grid constraints. The Applicant looked at the grid network and could not find a scenario where the 3GW from both project could be integrated into the grid at a single POI. The Applicant has been looking at collaboration with other developers as an option to minimise cable routes into shore, in particular with another round 4 developer. There has not been any conclusions to these discussions, but it is being considered.</p> <p>LG- In addition, the scale of the infrastructure that would be required for a 3GW option e.g., number of cables, size of cable trench, size of substation would be significantly larger than for one project. Provides a different set of environmental problems.</p> <p>MK- Any options that reduce the overall level of cable are worth exploring further. We are expecting something from the holistic network design (HND) in the new year. Is there a risk that the result of that takes the project in a different direction with different cable options? Is this being considered?</p> <p>LH- Yes there is a risk that this will affect the cable route options. This is the same for all the round 4 projects, given the process and Government targets for 2030. The Applicant has had to make some assumptions around the outcomes of the HND. Rather than wait for the HND results, constraints work has started to mitigate the effect of the HND on project timelines. It is possible that the project will not end up with one of the grid connections currently being studied.</p> <p>EH- Why have the Welsh landfall/POIs not been considered for Morgan e.g. Wylfa?</p> <p>LG- We did look at this early on however a strategic decision was made by bp/EnBW to split the options, so Morgan went to England and Mona went to Wales. The routes to the POI options not presented here did not scope as well on the environment constraints scoping process.</p> <p>LH- As we do not have clarity from National Grid, in order to manage workload and number of options, the Applicant focused the export</p>		

	<p>cable routes towards the POIs for the country within which water they are located in.</p> <p>MK- Liverpool Bay SPA is difficult to avoid however the Applicant could look at areas of greater sensitivity with the SPA for future refinement work. In addition, Natural England would need to see better maps of the onshore SPAs to provide advice.</p> <p>KL- We would look at providing more detailed maps and requesting detailed feedback prior to the next meeting in February/March when we know what the POIs are.</p> <p>EH- Highlighted that there is a tidal lagoon power station being considered near the Connah’s Quay option.</p> <p>LH- We are aware of this.</p> <p>MK- Is the Applicant anticipating that the Morgan project will get a POI in England and Mona will get a POI in Wales? Has this been confirmed by grid?</p> <p>LH- It could be that they both end up with POIs in Wales or England however, the POIs for each project that we have been studying are what the Applicant has assumed to be the most viable, based on the little information provided by NG to date.</p>		
<p>7.</p>	<p><b>Next steps</b> (presented by KL)</p> <p>Could all consultees give some thought to the broad process presented today, to confirm that the process is acceptable and/or to identify any red flags in the process.</p> <p>When the Applicant knows the POIs for both projects, the Applicant will produce a paper on the POI options and circulate to the EP Steering Group. This will be with the aim of getting written feedback on the indicative routes. This will be followed by another steering group meeting in late February/early March 2022 to discuss this feedback. This feedback will then inform the final cable route for the projects. Scoping will present the broader scoping search area as these indicative routes are still a work in progress. Refinement of the route will be subject to further consultation post-scoping.</p> <p>MK- Does the Applicant want something in writing following this meeting?</p> <p>KL- We will circulate meeting minutes within a week. It would be useful if the attendees could provide initial feedback on the following, during or after the meeting:</p> <ul style="list-style-type: none"> <li>• Broad approach to the Cable Routing Study, including advice/guidance and principles.</li> <li>• High level feedback on any particularly sensitive receptors/red flags within the Search Areas.</li> </ul>	<p>Attendees to provide initial feedback.</p>	<p>21/01/2022</p>

	<p>SJ- The MMO would want to discuss the paper on the selection POIs with Cefas. The MMO would need to give Cefas 4 weeks to for them to provide comments.</p> <p>KL- This aligns with the ways of working document and timescales that were presented in the first Steering Group meeting.</p> <p>LL- The EA would be interested in seeing the slides with the timescales on. Happy for the Applicant to cut out the sensitive information and just provide the slides with the project timescales on.</p> <p>K- Yes that can be done.</p> <p>MP- We can also share the slides for the first SG meeting.</p> <p>GB- What is the rationale behind the scoping reports being submitted only a week apart and not submitted at the same time? It might make it easier on consultees or it might not.</p> <p>LH- This request came from previous consultation with the Planning Inspectorate.</p> <p>GB- If there is a large cross over between the spatial extent of project then it may cause problems for the Planning Inspectorate to know which project comments relate to. However, these presented scoping search areas look spatial separate therefore this may be less of a concern for the Planning Inspectorate. A stagger may help the resourcing of consultees commenting on the project as well.</p> <p>LH- We will consider it further.</p>	<p>RPS to provide slides from 1<sup>st</sup> SG meeting and timelines slides form 2<sup>nd</sup> SG meeting to the EA.</p> <p>Bp/EnBW to consider 1 week stagger on Scoping submission.</p>	<p>22/12/2021</p> <p>22/03/2021</p>
<p>8.</p>	<p><b>Close of meeting</b></p>		



## **A.3.2 Response from Natural England regarding the meeting minutes**

Date: 20 January 2022  
Our ref: DAS/UDS A000566 / 376487  
Your ref: Morgan and Mona Evidence Plan Steering Group Meeting 2 – Cable  
Routeing Study Introduction



██████████  
BP Alternative Energy Investments Limited

c/c ██████████  
RPS/ Energy

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

0300 060 3900

Dear ██████████

**Discretionary Advice Service (Charged Advice) - UDS A000566**

**Contract Reference:** BP EnBW Morgan and Mona Offshore Wind Farm

**Consultation:** Evidence Plan Steering Group Meeting 2 - Cable Routeing Study Introduction

This advice is being provided as part of Natural England's Discretionary Advice Service in accordance with the Quotation and Agreement dated 17 May 2021 to BP Alternative Energy Investments Limited.

The following advice is based upon the information presented in the Evidence Plan Steering Group Meeting 2 (attended on 13 December 2021) which included a presentation by ██████████ from RPS and subsequent meeting notes provided on the 22<sup>nd</sup> Dec 2021 by ██████████.

Natural England were asked to provide advice upon:

1. Broad approach to the Cable Routing Study, including advice/guidance and principles;
2. High level feedback on any particular sensitive receptors / red flags within the Search Areas.
3. Timings of the submission of the scoping reports

**1. Broad Approach to Cable Routing Study**

The general approach to reviewing the impact of potential cable routes is supported and Natural England welcomes the guiding principles (as set out in the Evidence Plan Steering Group Meeting) used to support the work of this study. It would be a useful addition to records to include some sort of justification for their alignment, particularly where conflicting constraints have been identified (i.e. where the shortest route through designated sites has not been taken forward).

**2. High level feedback on particular sensitivities**

**The Conservation of Habitats and Species Regulations 2017 and The Conservation of Offshore Marine Habitats and Species Regulations 2017**

From the information presented on the potential cable route corridors there is potential for the development to impact on the following Special Areas of Conservation (SAC), Special Area of Protection (SPA) and Ramsar sites:

- Ribble and Alt Estuaries SPA and Ramsar Site;
- Sefton Coast SAC;
- Dee Estuary SAC;
- Dee Estuary SPA and Ramsar Site;
- River Dee and Bala Lake SAC.

Natural England publishes full details of protected sites and the designated features they protect on [Natural England's Designated Sites View](#), this includes conservation advice packages where available<sup>1</sup> and maps. Regarding marine sites, the Advice on Operations section of the conservation advice packages identifies the pressures of certain activities on the designated features. This may be helpful in recognising specific pressures, and in aiding understanding of the sensitivity of the features to that pressure. Please be aware that where low risk pressures/low sensitivities are identified, this may not specifically mean it is low risk in relation to the designated site, as this will need to be determined through consideration of site-specific factors. To assist this consideration, where they are available the Supplementary Advice on Conservation Objectives (SACO) sets out a series of attributes that describe the conditions required to meet the conservation objectives.

As highlighted in the report 'Natural England and JNCC advice on key sensitivities of habitats and Marine Protected Areas in English Waters to offshore wind farm cabling within Proposed Round 4 leasing areas' (2019)<sup>2</sup> consenting and installation issues have largely been due to their impacts on habitat features, protected in their own right or as supporting habitats for species. This report provides more detail about the potential pressures and sensitivities relating to cabling and is a useful resource. It is currently being updated so additional comments on sites highlighted as part of the Cable Routing Study and their sensitivities, including National Nature Reserves, are set out within Appendix 1: Designated Site Sensitivities.

### **Marine Mammals**

Marine Mammals listed in Annex II if the Habitats Directive include:

- Harbour porpoise (*Phocoena phocoena*);
- Bottlenose dolphin (*Tursiops truncatus*);
- Common (harbour) seal (*Phoca vitulina*); and
- Grey seal (*Halichoerus grypus*).

The most commonly recorded cetaceans close to the Lancashire coast are harbour porpoise, followed by short-beaked common dolphin and bottlenose dolphins.

There are several areas commonly used as haul-out areas close to the cable corridor on the Dee, such as the well-established area for young male grey seals off Hilbre Island in the Dee Estuary and another site lies to the north of the Fleetwood coastline on south Walney Island.

Although sites within the project are designated within England are not designated for grey seals, common seals and bottlenose dolphin these populations could be linked with sites designated for these features in Wales and Ireland, this would need to be explored as part of the Habitats Regulations Assessment for the project.

### **Marine and Coastal Access Act 2009**

The proposed cable routes have the potential to impact on the following Marine Conservation Zones:

- Fylde MCZ
- Ribble Estuary MCZ

Details on site features and the Conservation Advice Package these MCZs are accessible on [Natural England's Designated Sites View](#).

### **Wildlife and Countryside Act 1981 (as amended)**

In most cases the Sites of Special Scientific Interest (SSSIs) which underpin an internally designated site above mean low water have the same features however in some cases the SSSIs have a broader range

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<sup>1</sup> Currently available for Sefton Coast SAC, Ribble and Alt Estuaries SPA, Mersey Estuary SPA, Mersey Narrows and North Wirral Foreshore SPA, and Fylde MCZ.

<sup>2</sup> [Natural England and JNCC advice on key sensitivities of habitats and Marine Protected Areas in English Waters to offshore wind farm cabling within Proposed Round 4 leasing areas. September 2019.](#)

of features so it is advised that the citations for SSSIs are referred to, these are available on Designated Sites View.

### **National Nature Reserves**

National Nature Reserves are some of the most important sites in the UK for wildlife and geology, in England declared by Natural England under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981. They are managed primarily for their habitats and species, or geological or geomorphological features, but also provide great opportunities for people to experience nature and provide 'outdoor laboratories' for research.

There are three NNRs in the study area; Ribble Estuary, Cabin Hill, and Ainsdale Sand Dunes. Additional details regarding their importance are provided in Appendix 1.

### **Additional Considerations- England Coast Path**

Natural England has a duty to provide coastal access on foot around the whole of the English coast. The development of the onshore element of the cable corridor should take into account any impacts on this route on both a permanent and temporary basis and mitigate for the effects.



### **3. Timings of the submission of scoping documents**

Whilst a short timeline between the submission of scoping documents appears to be acceptable at this stage the submission of two NSIP projects within a close time frame in the longer term may want to be revised depending on the complexity of issues further evidence and studies raise as this may result in resourcing issues for specialists for Statutory Nature Conservation Bodies.

It was set out in the Evidence Plan Steering Group Meeting 2 that there is the aim to publish the Preliminary Environmental Information Report (PEIR) for early formal consultation in early 2023. This would only allow for one full year of overwintering bird survey data (surveys starting in winter 2021) to be presented. Natural England highlight the risk that the second year of data collection could have potential to change the conclusions, which could cause potential delays to the project. In addition, Natural England have previously advised (Natural England reference: DAS/UDS A000566 / 374171, dated 12 November 2021) that two years of survey effort is the minimum expected evidence standard for bird data, and seeks confirmation that the timetable set out for DCO submission allows for this evidence standard.

For clarification of any points in this letter, please contact me using the details provided below.

Yours sincerely

  
Strategic Coastal Lead Adviser  
Coast and Marine Team  
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team  


The advice provided in this letter has been through Natural England's Quality Assurance process.

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and

revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Cc [REDACTED]

## **Appendix 1: Designated Site Sensitivities**

### **Liverpool Bay Special Protection Area (SPA)**

The conservation advice package for Liverpool Bay SPA is currently been updated since the site was extended and new features were added to the citation in 2017. The current published Regulation 35 package for the site is out of date and does not include reference to the site extension or new features. The up to date citation and Conservation Objectives are available on Natural England's Access to Evidence Catalogue <sup>3</sup>. Natural England, Natural Resources Wales and the Joint Nature Conservation Committee are currently working together to publish a Regulation 37 package in April 2022 (subject to sign off) to include the new features. Given the size of Liverpool Bay SPA when considering development it is advised that areas of greatest sensitivity are identified and avoided.

### **The Sefton Coast Special Area of Conservation (SAC)**

This site comprises one of the largest and most diverse dune systems in England. The site is designated for a wide range of dune features and displays both rapid erosion and active shifting dunes with a substantial stretch of the dune system fronted by shifting dunes. Much of the SAC has public access and includes two National Nature Reserves, five championship golf courses and a military training camp. This means that most of the SAC has either full public access, or is adjacent to public rights of way and is already at risk from high levels of disturbance. In addition, there are already existing cables (i.e. fibre optics) along this stretch of coastline which would need to be taken into consideration. Natural England note that the maps presented in the meeting Sefton Coast SAC was not displayed on the map of the SACs that were impacted by potential cable routes, this should be updated to include this site.

### **Ribble and Alt Estuaries SPA and Ramsar**

This site supports large numbers of overwintering and breeding bird species that use the extensive areas of sensitive saltmarsh and mudflats which are highly sensitive to disturbance. Part of the southern edge near the mouth of the estuary has undergone managed realignment to create additional supporting habitat. Cabling through any of these areas would risk extensive damage to these supporting habitats. The site has some important cockle fisheries, and military activity as well as some industry. Part of the site overlaps with the Sefton Coast SAC.

### **Dee Estuary SAC, and Dee Estuary SPA/ Ramsar**

The Dee Estuary SAC was primarily designated for its extensive saltmarsh and intertidal mud and sand flats. As the highly sensitive saltmarsh extends across most of the SAC/SPA it would be difficult to micro-site cables around this and Horizontal Directional Drilling (HDD) could also be difficult to achieve due to the extent of the feature. In addition the Dee Estuary has River Lamprey and Sea Lamprey as Annex 2 qualifying features and consideration to the impacts on these migratory fish of the cable construction and operation should be taken into account. Sea lamprey and river lamprey use the estuary as part of a migratory route to the River Dee. Sea and river lampreys spend their adult life in the sea or estuaries but spawn and spend the juvenile part of their life cycle in rivers.

Additionally, the SPA/Ramsar site supports large numbers of designated overwintering and some breeding bird species which would be highly sensitive to disturbance. Currently the majority of activity is on the coastal fringe of the sites, with some industry and small amount of fisheries, these constraints will need to be considered in narrowing the location of the cable corridor.

### **Dee Estuary and Bala Lake SAC**

This site is designated for Atlantic Salmon as a primary Annex 2 species and both River and Sea Lamprey as Annex 2 qualifying features, these migratory fish features should be considered for potential impact disturbance from noise during construction, operation and decommissioning as well as any impact of electromagnetic disturbance from the cable when in operation.

### **Fylde Marine Conservation Zone (MCZ)**

This site is designated for subtidal mud and subtidal sand, with the depth of the seabed within the site

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<sup>3</sup> [Natural England's Access to Evidence European Site Conservation Objectives for Liverpool Bay / Bae Lerpwl SPA \(UK9020294\)](#)

ranging from almost being exposed on low tide (approximately 35 cm depth) to 22 metres at its deepest. The sediment habitats are known to support rich bivalve mollusc populations and the site also includes important nursery and spawning grounds for several commercially important fish species including sole (*Solea solea*), plaice (*Pleuronectes platessa*) and whiting (*Merlangius merlangus*).

#### Ribble Estuary MCZ

This site is designated for Smelt (*Osmerus eperlanus*) and that consideration to the migratory fish feature should be considered for potential impact disturbance during construction.

#### Ribble Estuary National Nature Reserves (NNR)

The NNR is formed of a large managed realignment area of restored saltmarsh as well as mud and sand flats and coastal grasslands, with the Ribble estuary is one of the most important sites for overwintering wildfowl in the UK sited along a key migration route.

#### Ainsdale Sand Dunes NNR

The sand dune habitats that make up this site support many locally or regionally rare plant species, as well as natterjack toad, red squirrel, sand lizard and great-crested newts being found on the site. The site supports a network of public footpaths and is a popular area for recreation.

#### Cabin Hill NNR

Is the smallest of the three NNRs, and consists of embryo dunes, yellow dunes, fixed dunes, wet slacks, flower-rich grassland, dune pasture and deciduous woodland. The shore provides feeding and roosting grounds for many migrating and over-wintering birds. Both Common lizard and sand lizard are found on the site.

## **A.4. Steering group meeting 2.5**

### **A.4.1 Meeting minutes**



# MINUTES OF MEETING



Security Classification: Project Internal

**MOM Number** : 20211214\_Morgan and Mona EP\_EP Steering Group **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group Meeting 2 – Session 2

## MINUTES OF MEETING

**MEETING DATE** : 14/12/2021

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : [REDACTED]

**ISSUED BY** : [REDACTED] (RPS) / [REDACTED] (RPS)

### PERSONS PRESENT:

- [REDACTED] – bp (MP)
- [REDACTED] – bp (WD)
- [REDACTED] – Wood )
- [REDACTED] – RPS (CR)
- [REDACTED] – RPS (NS)
- [REDACTED]
- [REDACTED] – NRW (LR)
- [REDACTED]

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1.	<p><b>Introduction</b></p> <p>NS- This meeting is to introduce the cable route study for Morgan and Mona, to get very high level feedback on the cable routeing process and to identify any red flags. It is not the Applicants intention to provide the full slides, as per the email from KL on 10-Dec-21. Further information will be provided, and more detailed consultation will take place next year when the projects have their grid connections.</p> <p>This presentation was also held yesterday with the JNCC, MMO, PINS, NE and EA, who were unable to attend today.</p>		
2.	<p><b>Overview of the Projects (Presented by NS)</b></p> <p>bp are working with EnBW to develop the Morgan and Mona offshore wind farms as two separate projects. These sites were awarded as part of the The Crown Estate’s Round 4 offshore wind leasing round. Currently they are at preferred bidder status. The intention is for both projects to be developed as fixed bottom offshore wind farms. They will be developed on similar but slightly staggered timescales and will be under separate consent applications. The Mona project is aiming to</p>		

	<p>be operational in 2028 and the Morgan project is aiming to be operational a year after.</p> <p>At the moment the applicant is awaiting a decision from the Offshore Transmission Network Review (OTNR) which will inform the grid connection for both projects.</p> <p><b>Key Dates</b></p> <p>Both projects are currently at pre-scoping stage.</p> <p>The scoping reports for both projects are planned to be submitted at the end of March 2022. The intent is to have each project submission offset by a week as per the Planning Inspectorate’s preference.</p> <p>The applicant is currently undertaking pre-scoping engagement including local authority engagement. Throughout 2022 the applicant will progress with consenting and both offshore and onshore surveys.</p> <p>Local authority engagement and fisheries engagement have begun. The applicant has also kicked off a maritime navigation engagement forum.</p> <p>The applicant aims to publish the Preliminary Environmental Information Report (PEIR) towards the end of 2022 with formal consultation scheduled for early 2023. The Mona Development Consent Order (DCO) application is currently planned to be submitted in October 2023 and the Morgan DCO planned for January 2024.</p> <p><b>Evidence Plan process</b> (presented by NS)</p> <p>The Evidence Plan (EP) process has been developed following the Planning Inspectorate and Defra guidance. The applicant has also considered draft guidelines provided by Natural England <sup>1</sup>.</p> <p>The EP has historically been HRA focused however in line with recent best practice, the applicant proposes to extend this to include the EIA process for ecology topics, including designated sites such as SSSIs and MCZs.</p>		
	<p>The applicant is proposing to carry out a single EP process for both projects. The applicant has received some comments on use of a single EP for both projects. The projects will have separate agreement logs to account for the differences between the projects ahead of the DCO applications. Meeting minutes will also note any differences between the projects.</p> <p><b>Evidence Plan Steering Group</b> (presented by NS)</p> <p>The purpose of the Evidence Plan Steering Group is to monitor progress of the EP. Meetings will provide key project updates and will</p>		

<sup>1</sup> Natural England (2021) Expectations for pre-application engagement and best practice guidance for the evidence plan process.

	<p>include an update on timescales to ensure resourcing during these periods are managed.</p> <p>The EP Steering Group will guide and inform the EP process. The group will meet at key milestones during the project programme for Mona and Morgan. A meeting is planned for February/March 2022 when the Point of Interconnection (POI) for the projects are known, to provide detailed information on the cable route selection study. An additional meeting is planned for April/May 2022 to coincide with the provision of the Scoping Opinion.</p> <p>The Environmental Agency (EA) was included in yesterday’s Steering Group meeting with the JNCC, MMO, PINS and NE, and will be included in the next Steering Group meeting as a key onshore stakeholder with an interest in the cable routeing study. Otherwise, they will be included in the onshore ecology EWG.</p> <p><b>EWG (presented by NS)</b></p> <p>Remits will be tweaked for each EWG to make it specific for each topic e.g., approach to underwater noise modelling for marine mammals. The EP will be updated and circulated prior to the first EWG.</p> <p>Broad approach to EWGs:</p> <ul style="list-style-type: none"> <li>• Information circulated to EWG minimum 2 weeks ahead of meeting.</li> <li>• Meeting is held with attendees prepared to comment on materials provided.</li> <li>• Full meeting minutes will be taken and agreement logs will be compiled where matters are agreed, and after each meeting the minutes and agreement log will be circulated and then agreed. The agreement log will be updated and appended to the DCO application.</li> </ul> <p><b>Cable Routeing Study Introduction (Presented by LG)</b></p> <p>When the Scoping Reports get submitted, the intention is that they will each have a single grid connection and therefore only one POI for Morgan and one POI for Mona. At the moment there are six POIs, four for Mona and two for Morgan. There are a number of routes corridors being developed for each POI, within each scoping search area. At this time, the Applicant is not asking for detailed feedback on the indicative routes as there are many indicative routes, four of which are anticipated to fall away once there is a decision on the POIs by National Grid. The purpose of this meeting is to introduce the cable routing study, to illustrate the search areas and indicative routes and request high level feedback on any particularly sensitive receptors and the approach to the cable route study. We are not requesting detailed feedback on the routes at this time.</p>		
3.	<p><b>Cable Routing Study (presented by LG)</b></p> <p>The cable routeing study is a technical GIS data driven study. The study looked at the six points of interconnection and considered a number of options for each POI. The aim was to find technically</p>		

	<p>feasible and the least environmentally constrained routes. It was not possible to avoid all constraints but the study used a number of guiding principles. The site selection for the array was undertaken previously for the round 4 application processes. There will always be a substation within the array, and this is where the cable route selection process started from. There are a number of possible landfall location options for each POI. These project might have a large variety of landfall types due to the variation in the coastline topography in this area. Onshore cable routing will be installed to the onshore substation before the cable provides power to the national grid. The study did not compare POI against POI as the choice of POI will be driven by National Grid.</p> <p><b>Guiding principals</b></p> <p>The project has taken several guiding principals into account during the cable route selection process:</p> <ul style="list-style-type: none"> <li>• The Crown Estate Cable Route Protocol (2019).</li> <li>• Holford Rules.</li> <li>• Natural England and JNCC advice for offshore cabling for Round 4 projects.</li> <li>• Natural Resources Wales advice for offshore cabling for Round 4 projects.</li> <li>• Design for community.</li> </ul> <p>The Holford rules have been considered with the assumption that all cables will be buried wherever possible. This is for the whole length of cable, onshore and offshore. No pylons have been considered for this project. Trenchless technologies will be used where required e.g., HDD underneath roads.</p> <p>The NE/JNCC advice on the mitigation hierarchy has been considered by minimising interaction with nature conservation designations. Where sites cannot be avoided, the study has tried to find the shortest overlap possible between the cable route and the designated sites. However, in some cases there have been other constraints which have meant that the shortest route across the designated site was not feasible.</p> <p>The Project design principals are designed for communities, they are technical design considerations to allow the project to cause as little disruption as possible. Urban areas have been excluded for the cable route selection study. Proximity to residences and other developments has also been considered for the substations. Substations will be as close to the POI as possible however they may need to be a few km away due to other constraints e.g., roads.</p>		
<p>4.</p>	<p><b>Site selection process</b> (presented by LG)</p> <p>The Applicant started the cable route selection study with very wide search areas. Constraints were categorised as hard or soft constraints. Hard constraints were no-go areas e.g., offshore platforms, aggregate areas, and urban areas. The constraints were all mapped to exclude hard constraints and to understand the distribution of soft constraints.</p>		

	<p>This was used to find the cable routes of least constraint. Landfall and substation location options were investigated by sending people out to these locations and taking detailed notes e.g., the state of the coastal defences, any other developments that are not visible from satellite imagery etc. The constraints were weighted to give a greater weighting to the constraints that have a greater bearing on the decision making process. Spatial mapping was used to interrogate the constraints e.g., to measure the length of a cable route through a specific constraints. This enabled one route to be compared against another and each route was scored against each constraints. This gives each route option a ranking on how it compares against the other options therefore allowing identification of the preferred route. Reasonable alternatives have also been presented as we are looking for very early feedback and will be looking for more detailed feedback when the POI for each project is known. It will be possible to go back to the mapping stages of the selection study following stakeholder feedback.</p>		
<p>5.</p>	<p><b>Identified constraints</b> (presented by LG)</p> <p>Each POI has several landfall options except Bodelwyddan which has only one landfall option. There are SPAs around the entire North Wales and English coast in this area therefore it has been impossible to completely avoid them. The Flyde MCZ blocks the coast in form of the Penwortham POI therefore the shortest route through the MCZ has been used. However, a detailed look at the distribution of the designated benthic habitats within the MCZ will be done of the POI is chosen by NG and this may identify a different route as being the one least constrained. The Connah’s Quay route goes through the narrowest point of the Dee Estuary SAC. In some places, there are multiple designations for the same habitats however these have been considered separately.</p> <p>The northern indicative route for Kirkby goes through a nature reserve, this is designated for its dune system. This coastline is very constraints with large urban areas and Ministry of Defence (MOD) areas. The only open space is designated. This landfall is not the only option for this POI and it is understood that going through this designation is not ideal, the Applicant is open to consultation and consideration for this location if it becomes the POI for Morgan.</p> <p>The routes have also avoided other operational and round 4 projects e.g., the Cobra project. Consultation will be undertaken with those developers. There is also a large amount of oil and gas activity to the north of the Cobra project.</p> <p>The Wylfa POI is adjacent to the Wylfa power station. The coastline in this area is designated as an AONB. The AONB has a gap where the power station is, therefore the indicative route at this location does not interact with the AONB. However, it has been given due consideration as any development would be visible from the AONB.</p>		



	<p>approval, but the guidance will be provided as soon as it is available. Key messages will not change for the receptors covered in the advice note and therefore recommended that the Applicant continues to refer to the existing advice note in the meantime and other guidance referred to during the meeting.</p> <p>KN- It was mentioned that overhead lines are not being considered and HDD will be considered. Will there be detailed HDD feasibility studies undertaken? There have been examples where HDD has not been successful in some environments.</p> <p>CR- The Applicant would address this once we know which POI will be progressed and where the projects will connect into the National Grid. The Applicant would look at where the key HDD areas are, where the projects are relying on HDD to install the cables, then feasibility studies would probably be undertaken in those locations (although not all HDD locations).</p> <p>NS- The projects may carry HDD and open trench options through the pre-application process until the point where the project has enough confidence that HDD is feasible and can be committed to.</p> <p>NS- The Applicant received comments in the meeting on 13 December 2021 on collaboration options. The Applicant is looking at collaboration options with the Morecambe round 4 project. This will largely depend on the POIs chosen so there are no conclusions on this yet, but the discussions are ongoing.</p> <p>LR-NRW had an initial meeting with the Applicant on the Connah’s Quay landfall option in which NRW highlighted potential high-level constraints with this site e.g. shellfish and bathing water designations; the Dee Estuary cockle fishery managed by NRW; invasive non-native species and biosecurity etc. These constraints will need to be considered for this area.</p> <p>NS- It would be useful to see minutes from this meeting.</p>	<p>MP to provide meeting minutes from initial meeting with NRW</p>	<p>Complete</p>
<p>7.</p>	<p><b>Close of meeting</b></p>		

## **A.5. Steering group meeting 3**

### **A.5.1 Meeting minutes**



# MINUTES OF MEETING



Security Classification: Project Internal

**MOM Number** : 20220720\_Morgan and Mona SG **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group meeting 3.

## MINUTES OF MEETING

**MEETING DATE** : 20/07/2022

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : [REDACTED] (RPS)

**ISSUED BY** : [REDACTED] (RPS)

### PERSONS PRESENT:

- [REDACTED] – bp (GV)
- [REDACTED] – bp (MP)
- [REDACTED] – bp (WD)
- [REDACTED] – RPS (KL)
- [REDACTED]
- [REDACTED] – Natural England (AuB)
- [REDACTED] - Natural England (LB)
- [REDACTED] - Natural England (MK)
- [REDACTED] – JNCC (JW)
- [REDACTED] – NRW (LR)
- [REDACTED] - Planning Inspectorate (GB)
- [REDACTED] - Planning Inspectorate (HT)
- [REDACTED] - MMO (JS)
- [REDACTED] - MMO (DN)

### APOLOGIES:

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1.	<p><b>Project update (presented by WD)</b></p> <p>bp are working with EnBW in a 50/50 partnership (the Applicants) to develop the Morgan and Mona Offshore Wind Projects.</p> <p>Morgan is the northern project located in in English waters, and Mona is the southern project located mostly in Welsh waters. Together, they will have a combined capacity of 3GW. Subject to consent, Morgan and Mona will be delivered on similar but slightly staggered timescales and will be under separate consent applications. The Mona project is aiming to be operational in 2028 and the Morgan project is aiming to be operational in 2029.</p> <p>The Morgan and Mona Offshore Wind Projects are being developed as separate DCOs with separate landfalls.</p>		

	<p>The Applicant is looking to sign The Crown Estate (TCE) Agreement for Lease this year. We now have final clarity from the National Grid regarding the results of the Pathway to 2030 Holistic network Design which has provided the onshore grid connection points for the Morgan and Mona Offshore Wind Projects. Mona will have a grid connection at the existing Bodelwyddan National Grid substation. Morgan will have a shared grid connection at the existing Penwortham National Grid substation with the Morecambe Offshore Wind Project which is bring progressed jointly by Cobra and Floatation Energy. The two projects will share an onshore and offshore cable corridor however the projects will remain electrically separate. This means we have had to separate the Morgan generation and transmission assets. The Morgan (generation assets only) scoping report has been submitted to the Planning Inspectorate and the Applicant is working with Morecambe to deliver a joint scoping report, PEIR and DCO application for the transmission assets.</p> <p>The Morgan (generation assets only) and Mona (generation and transmission assets) PEIR submission will be at the end of Q1 2023. The Morgan (generation assets only) PEIR has been aligned with the Mona PEIR to allow the Applicant to properly consider the cumulative effects between the projects. This alignment is expected to continue to application.</p> <p>GV – Given the information just provided and with reference to the agenda item to present slides on the site selection process for the Morgan offshore cable corridor, the Applicant is in the process of setting up the collaboration with Cobra and Flotation Energy. As a result, the Applicant will not be presenting information for this standalone application for the Morgan/Morecambe transmission assets. Furthermore, it is believed that a separate Evidence Plan process is required for the Morgan/Morecambe transmission asset application. Details will be sent out for this as soon as is practicable. The Applicant will look to make meetings as efficient as possible between the three development applications, by, for example, scheduling meetings to occur on the same day.</p> <p>MK- What is the intention regarding the programme for the Morgan/Morecambe transmission assets application submission. Will there be an Environmental Statement that covers the Morgan Offshore Wind Project in its entirety?</p> <p>GV- The Applicant is currently discussing this internally. For the Morgan/Morecambe transmission assets application, firstly a section 35 direction request will need to be submitted to the Secretary of State to determine whether the Morgan/Morecambe transmission assets can be granted consent under the Planning Act 2008. The Applicant has looked to align the Mona and Morgan generation assets applications so that the cumulative effects can be fully considered. However, this has become more challenging with the requirement for collaborative transmission assets. The Applicant will update the steering group on the programme once finalised.</p> <p>MK- The Applicant needs to consider the accidental “salami slicing” of the project that two applications for Morgan may create. In addition,</p>		
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	<p>there are issues surrounding having different timescales for potential consent and construction of the generation and transmission assets.</p> <p>GV- The Morgan Scoping document (introductory section) gives a good explanation regarding why the Applicants has proceeded with submission of the Morgan (generation assets only) scoping report, one of the reasons being, for example, to maximise the time available to engage with stakeholders on resolving potential effects.</p>		
<p>2.</p>	<p><b>Offshore Cable Corridor route selection (presented by GV)</b></p> <p>This is a high-level overview. Detailed information on the site selection process will be presented within the site selection and consideration of alternatives chapter of the PEIR.</p> <p>Due to the Offshore Transmission Network Review (OTNR), National Grid (NG) could not initially provide a grid connection offer against the originally agreed programme. In order to mitigation the potential impacts of this on programme and the ability for Mona to potentially contribute to the 2030 Government targets for offshore wind energy, scoping reports were prepared against four potential points of interconnection (POI) to the grid. In March 2022 NG indicated a strong likelihood for POI at Bodelwyddan. NG confirmed grid connection at Bodelwyddan in May 2022.</p> <p>Wood were commissioned to undertake the site selection work and carried out a phased approach to the export cable route identification. ‘Show stopper’ constraints were identified early and then a process of constraints mapping and refinements where undertaken.</p> <p>Key technical constraints for the export cable route included:</p> <ul style="list-style-type: none"> <li>• Sufficient corridor width (1.5km) for up to 4 export cables with sufficient separation distance to avoid the risk of damage to neighbouring cables during installation and repair</li> <li>• Minimise cable and pipeline crossings</li> <li>• The total route length (beyond 100km an HVDC connection would likely be required rather than HVAC, and would require more onerous infrastructure) and technically feasible landfall location and onshore route options</li> <li>• The ability to install using most common installation techniques.</li> </ul> <p>Key environmental constraints include:</p> <ul style="list-style-type: none"> <li>• SPAs (Liverpool Bay, Anglesey Terns, Lavan Sands / Conway Bay, Dee Estuary)</li> <li>• SACs (Menai Strait and Conwy Bay, Dee Estuary, North Anglesey Marine)</li> <li>• Annex 1 type Sandbanks and reefs</li> <li>• Existing wind farms, export cables and proposed Awel-y-Mor project</li> <li>• Oil &amp; Gas; Milom Gas Field and gas pipelines</li> <li>• Shipping &amp; Navigation: Anglesey/Liverpool TSS, east of Anglesey anchorages, Irish Sea ferry routes.</li> </ul>		

	<p>Initially the Applicant considered four offshore cable routes between the Mona Offshore Wind Project and Bodelyddan; one route to the west of the proposed Awel Y Mor array area, and three routes passing through the gap between Gwynt y Mor east and west, but the routes going through the gap were rejected during review due to significant technical constraints associated with Gywnt-y-Mor wind farm and export cables, Milom gas pipeline, other wind farm infrastructure and congested landfall options.</p> <p>The selected export cable route to the west of Awel-y-Mor has a perpendicular crossing of the vessel Traffic Separation Scheme, it passes through the Liverpool Bay SPA. Due to the proximity of the Constable Bank to the Menai Straights and Conwy Bay SAC, the cable route unavoidably crosses the edge of Constable bank at its western periphery and Menai Straights and Conwy Bay SAC at its eastern periphery. It avoids Awel-y-Mor, other windfarms and associated export cables, avoids the unofficial anchorage to the east of Anglesey, it avoids Lavan Sands/Conway Bay SPA and the North Anglesey Marine SAC.</p> <p>Benthic and geophysical surveys for the proposed Offshore Cable Corridor are currently underway. These surveys will also include drop down video surveys to identify any sensitive or Annex I benthic habitats.</p> <p>KL- Data for the Mona Offshore Cable Corridor won't be included in the PEIR, only in the final application. The Applicant will present the initial findings of the surveys through the expert working groups at the earliest opportunity next year.</p> <p>LR- The Mona Offshore Cable Corridor crosses the Constable Bank which is an Annex I sandbank feature. NRW would advise that the Constable Bank is avoided. NRW would also advise that sandwave clearance should not occur on the bank and rock protection for cables should not be placed on the banks or in close vicinity. Sandbanks are an important feature of the sediment budget to protect the coast from waves. Also noting that there are important species associated with sandbanks which may also be affected by cable installation. NRW will provide formal comments after the meeting.</p> <p>LR- The Mona Offshore Cable Corridor also goes through the Menai Strait and Conwy Bay SAC. It may be in close proximity with the reef features of that SAC. NRW would advise that all reef features of the SAC are avoided by micro-siting the cables. No rock protection should be placed within the SAC. The Pensarn Beach SSSI should be listed as a key environmental constraint. The vegetative shingle bank feature should be considered as an Annex I feature. Cables within the intertidal area could need protection and this could impede the sediment transport regime which is key to the SSSI feature.</p> <p>GV- The Mona Offshore Cable Corridor is approximately 90km long therefore there isn't any scope for increasing this length to avoid the Constable Bank and SAC and due to their proximity to one another, there is little space to allow this practically. The geophysical and</p>	<p><b>NRW to provide comments on the Mona export cable route, including concerns</b></p>	<p><b>Completed</b></p>
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	<p>benthic data currently being collected will inform the need for cable micrositing and mitigation if required.</p> <p>KI- The ongoing surveys will identify any reef features and pre-construction surveys will be carried out which will inform the final micrositing of cables around reef features if they are recorded.</p> <p>HT- If the benthic data won't be presented in the PEIR, how will the Applicants ensure stakeholders have enough time to consider the data before application to ensure matters aren't brought into the examination.</p> <p>KL- There is extensive desk top data for the area and a lot of the assessment will be included in the PEIR. The PEIR will cover any comments raised during the EWGs or in the Scoping Opinion. The intention is to add in the site-specific data and refined the assessment presented in PEIR. The Applicant would look to engage with the EWG while the PEIR is being updated to ensure they understand the results of the site-specific surveys and what the implications are for the assessment presented in PEIR.</p> <p>HT- How long will it be between when the results of the site-specific survey are presented and the application.</p> <p>GV- Until the data collection is complete, we cannot provide a timescale for compilation of the analysis and presentation of the results. However, the Applicant understand the need for there to be sufficient time to consult on this.</p> <p>GB- This has been brought up in other examinations and the Applicant needs to carefully consider the timescales for this.</p> <p>GV- The Applicant will consult on the results of the site-specific surveys as soon as they are available for external distribution.</p>	<p><b>regarding Constable Bank.</b></p>	
<p>3.</p>	<p><b>LSE screening methodology (presented by KL)</b></p> <p>These slides will present the approach to identifying site and species where there is potential for likely significant effect. The slides are presenting the same information as was sent to the steering group in a technical note a few weeks ago.</p> <p>For ornithology, the approach is only broadly described, and this will be looked at again in greater detail once more work has been carried out on the baseline characterisation, Collision Risk Modelling (CRM) and displacement modelling.</p> <p>So the first step we use considers three criteria to identify relevant European sites. This is a general approach for all receptor groups.</p> <ol style="list-style-type: none"> <li>1. that the project boundary overlaps with Site</li> <li>2. that qualifying interest features (particularly mobile species) have ranges which overlap the Project boundaries</li> <li>3. that sites/features occur in the Zone of Impact (Zoi) of impacts associated with the Projects.</li> </ol> <p><u>Annex I habitats</u></p>		

	<p>Criterion 1- It is anticipated that one site will be screened in on the bases of Criterion 1 for the Morgan/Mona Offshore Wind Projects.</p> <p>Criterion 2-There are no European sites which meet this criterion for Annex I benthic habitats.</p> <p>Criterion 3-ZOI for indirect effects will be based on one mean spring tidal excursion in the vicinity of the Morgan/Mona Offshore Wind Project prior to Physical Processes modelling. One mean tidal excursion equates to approximately 9km in the northeast and southwest direction and 3km in the northwest/southeast direction from the Mona Array Area and 7km in a northeast/southwest direction and 2km in a northwest/southeast direction in relation to the Mona Cable Corridor.</p> <p>For the purposes of LSE screening, a precautionary approach will be adopted, and this buffer has been increased to 15km.</p> <p><u>Sites designated for Annex II diadromous fish</u></p> <p>Criterion 1- There are no European sites which meet this criterion for Annex II diadromous fish.</p> <p>Criterion 2- The approach will consider the potential for disruption to migration (i.e. barriers to migration) of diadromous fish, including Atlantic salmon, to/from natal rivers.</p> <p>For the purposes of LSE screening, a precautionary approach will be adopted using a buffer of 100km in line with guidance from the Plan Level HRA (The Crown Estate, 2021). Sites located just outside the 100km buffer will be included. E.g. sites flow into the eastern Irish Sea and 100km buffer and therefore may have potential connectivity with the Morgan/Mona Offshore Wind Project.</p> <p>Criterion 3- Given the large buffer proposed for criterion 2 it is not anticipated that any additional European sites with Annex II diadromous fish as qualifying features, beyond those already identified for criterion 2 will be screened in.</p> <p>LR- NRW noted that with reference to the Crown Estate Round 4 HRA principles, a 100km buffer is used for most diadromous fish except Atlantic Salmon and Fresh Water Pearl Mussel which use a Regional Areas Approach.</p> <p>KL- Can NRW provide this advice in their response to the meeting minutes, RPS will look at this to ensure all relevant sites where there is a credible impact pathway are considered.</p> <p><i>Post meeting note: NRW (A) advise that The Crown Estate Round 4 HRA principles are adopted in their original form. This comment was querying the presented interpretation of the principles with regards to Atlantic Salmon and Fresh Water Pearl Mussel. Section 3.6.17 – 3.6.23 Migratory Fish and Freshwater pearl mussel and Figure 3.1 Proposed regional boundaries for Atlantic salmon of the principles, outline a 'Regional Areas Approach' for Atlantic salmon and Fresh Water Pearl Mussel.</i></p>	<p><b>NRW to provide more detail on the recommended approach for Atlantic Salmon and pearl mussel.</b></p>	<p><b>Completed</b></p>
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	<p><u>Marine mammals</u></p> <p>Annex II marine mammal species likely to occur in the vicinity of the Morgan/Mona Offshore Wind Project and therefore considered in the LSE screening (based on Digital Aerial surveys):</p> <ul style="list-style-type: none"> <li>• Harbour porpoise <i>Phocoena phocoena</i></li> <li>• Bottlenose dolphin <i>Tursiops truncatus</i></li> <li>• Grey seal <i>Halichoerus grypus</i></li> <li>• Harbour seal <i>Phoca vitulina</i>.</li> </ul> <p>Criterion 1-There are no sites with Annex II marine mammal species as qualifying features which overlap with the Morgan/Mona Offshore Wind Project.</p> <p>Criterion 2-Screening distances considers NRW advice on use of marine mammal management units in HRA.</p> <p>Criterion 3- Given the large buffers proposed above for both cetaceans and pinnipeds in criterion 2, the ZOI for key impacts are anticipated to be well within this area. Therefore no additional sites will be screened in for further consideration on the basis of this criterion.</p> <p>The Applicant has an action from the marine mammal EWG to look at the foraging ranges and marine mammal management units used for grey seals, with particular reference to the Carter et al. study for seals, including tracking data. Sites will be considered within the marine mammal management units but only screened if the sites closer to the Morgan/Mona Offshore Wind Project are screened in.</p> <p><i>Post meeting note: As outlined in NRWs Position Statement, where there is evidence of a credible risk, all sites within the management unit should be screened in for LSE, but the Appropriate Assessment should concentrate on the closest sites first. If AEOSI can be ruled out for the closest/most relevant sites then it can (more than likely) be ruled out for more distant sites. Please refer to the more detailed minutes following the 2nd Marine Mammal EWG.</i></p> <p><u>Sites designated for Annex I habitats (onshore)</u></p> <p>Criterion 1- There are no European sites with relevant qualifying Annex I habitats (onshore) which overlap with the Morgan/Mona Offshore Wind Projects and so no sites will be screened in for further consideration on this basis.</p> <p>Criterion 2- There are no European sites which meet this criterion for Annex I habitats and so no sites will be screened in for further consideration on this basis.</p> <p>Criterion 3- The ZOI for such indirect effects associated with the onshore elements of the Morgan/Mona Offshore Wind Project is defined as 350m based on guidance from the Institute of Air Quality Management (IAQM) and The Highways Agency 2007. 350m is</p>		
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	<p>considered an adequate buffer to capture all indirect effects associated with the Morgan/Mona Offshore Wind Project.</p> <p><u>Initial identification for Annex II species (onshore)</u></p> <p>It is considered that any European sites located more than 30 km from the Morgan/Mona Offshore Wind Projects are sufficiently far for there to be no risk to an Annex II terrestrial species.</p> <p>A buffer of 10km is considered for lesser horseshoe bats based on a home range (between summer and winter roosts) of 5-10 km (Collins et al 2016 cited: Bat Conservation Trust / BMT Cordah Ltd, 2005). The nearest SAC is located well outside of this buffer and therefore not considered further.</p> <p>A buffer of 2km is considered for great crested newt (e.g. English Nature 2001). The nearest SACs are located well outside of this buffer (e.g. &gt;20 km) and therefore not considered further.</p> <p><u>European Otter</u></p> <p>Criterion 1- There are no European sites with relevant qualifying Annex I habitats which overlap with the Morgan/Mona Offshore Wind Project.</p> <p>Criterion 2- Otters can have relatively large home ranges and can travel considerable distances in one night, particularly during dispersal (e.g. more than 20 km, cited in Chanin 2003; or an estimated average home range of 27 km, Harris et al. 1995, cited in Chanin 2003).</p> <p>Therefore sites within 27 km will be considered for LSE.</p> <p>Criterion 3- No additional European sites with Annex II otter as qualifying features, beyond those already identified for criterion 2, are therefore screened in for further consideration on the basis of criterion 3.</p> <p><u>Initial Identification for Onshore Ornithological Features</u></p> <p>SPAs (and Ramsar sites) with onshore waterbird qualifying features will be identified using expert knowledge and evidence from the literature on migratory routes and foraging range of waterbirds.</p> <p>This will be based on judgement of the sites location and surrounding SPAs designated for wintering waterbirds.</p> <p>A precautionary approach will be taken with sites within 50km of the cable landfall being considered as a starting point.</p> <p><u>Offshore ornithology</u></p> <p>SPAs (and Ramsar sites) which have the potential to be affected by the Morgan/Mona Offshore Wind Project are those which:</p> <ul style="list-style-type: none"> <li>• Overlap with the location of the Morgan/Mona Offshore Wind Project, or with the area in which potential effects could extend</li> </ul>	<p><b>RPS to provide clarification on the tool used for considering sites with offshore</b></p>	<p><b>Completed</b></p>
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	<ul style="list-style-type: none"> <li>• Include seabird qualifying features that use the waters in and around the Morgan/Mona Offshore Wind Project (e.g. for foraging)</li> <li>• Include qualifying features which may fly through the area of the Morgan/Mona Offshore Wind Project during migration.</li> </ul> <p>The SPAs (and Ramsar sites) will be considered under the following categories:</p> <ul style="list-style-type: none"> <li>• Marine SPAs</li> <li>• Breeding seabird colony SPAs (and Ramsar sites)</li> <li>• SPAs (and Ramsar sites) with migratory waterbird qualifying features</li> <li>• Other SPAs (and Ramsar sites) which are located within the ZOI of the Morgan/Mona Offshore Wind Project.</li> </ul> <p>MK- What tool is the Applicant using for assessing potential impacts on migratory seabirds and waterbirds? Is it the BTO SoSS tool.</p> <p>KL- We will need to check this with the RPS ornithologists. To provide confirmation in the meeting minutes.</p> <p><i>Post meeting clarification – the SoSS tool is being used for migratory species.</i></p> <p>LR- NRW would advise that until the data analysis on the survey’s results is completed that all Welsh SPAs and SSSIs should be included in the scope.</p> <p>KL- Would this be regardless of the criterion e.g. foraging ranges and location of the waterbird features.</p> <p>LR- We agree with the approach in general and the criteria, but we advise that all relevant SPAs and SSSIs are kept in scope. NRW to provide further detail and clarification on this.</p> <p>KL- The applicant would like to be sure that what is provided at PEIR focuses on the key sites and is proportionate. Further refinement of the sites considered will be discussed with the EWGs.</p> <p>GB-The pre-screening is very far reaching, and the Planning Inspectorate is confident that this can be captured. The Planning Inspectorate would encourage to keep the screening and assessment to credible pathways that have the potential to give rise to significant effects rather than theoretical pathways. If all pathways are included, then this gives rise to a very long list. The aim of this process is to get to likely significant effects.</p> <p>GB - The screening process is iterative, but the Inspectorate has experienced screening reports submitted at application that aren’t completely up to date with the rest of the project. Please ensure that all documents submitted with the application are up to date and consistent with each other. The structure of the screening report is led by receptor type however the appropriate assessment needs to make a conclusion for the entire site which may have a number of qualifying features from the different receptor groups.</p>	<p><b>ornithology features</b></p> <p><b>NRW to provide further detail and clarification on SPAs and SSSIs to be included in the LSE screening</b></p>	<p><b>Completed</b></p>
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	<p>KL noted the comments by the Inspectorate and confirmed that the Information to Support Appropriate Assessment will include consideration of the effects of the project on the site as a whole.</p> <p>MK noted that the application should also give consideration to identification of a wider set of designated seabird sites, including SSSIs and MCZs. KL noted that MCZs would be fully considered in the MCZ Assessment and would look to screen sites on a similar basis. SSSIs will be treated similarly as part of the EIA.</p>		
4.	<p><b>Scoping opinion (presented by KL)</b></p> <p>The Applicant wanted to give the steering group an opportunity to raise anything from the scoping opinion for Mona and Morgan. The Applicant has been working through the response to Mona and will be providing a response where required in addition to including comments in the PEIR.</p> <p>MK- Please ensure that the regulator has all the information needed to consider all elements of the project, across transmission and generation assets. Particularly important for Morgan – this is noted in NE’s scoping response where we draw on ‘lessons learnt’ from the Triton Knoll OWF case.</p>		
5.	<p><b>NEXT STEPS</b></p> <p>The next steering group meeting will focus on the Morgan cable route selection and how the Applicant is going to engage on the process with the Morgan/Morecambe project.</p>		
6.	<p><b>Close of meeting</b></p>		

## **A.5.2 Morgan and Mona LSE Screening Methodology Paper for Consideration**

# MORGAN AND MONA OFFSHORE WIND PROJECTS

LSE Screening Methodology Paper for consideration by the Mona and Morgan Evidence Plan Steering Group



07 July 2022  
F01

**Document status**

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Final	RPS	RPS	bpEnBW	06/07/2022

**Approval for issue**

[Name]	[Signature]	[Date]
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**Prepared by:**

**RPS**

**Prepared for:**

**Morgan/Mona Offshore Wind Ltd.**

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## Glossary

Term	Meaning
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Mona Scoping Report	The Mona Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) and Natural Resource Wales (NRW) for the Mona Offshore Wind Project.
Morgan Scoping Report	The Morgan Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan Offshore Wind Project.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Mona Offshore Wind Project.
Mona Offshore Wind Project	The Mona Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets and associated activities
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets and associated activities.
Mona Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.
Morgan Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Mona Array Scoping Boundary	The Preferred Bidding Area that the Applicant was awarded by The Crown Estate as part of Offshore Wind Leasing Round 4.
Morgan Offshore Cable Corridor	The corridor located between the Morgan Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables and the offshore booster substation will be located.
Morgan Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Morgan Scoping Report as the area encompassing and located between the Morgan Array Scoping Boundary and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables and any offshore booster substation will be located.
Mona Offshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area encompassing and located between the Mona Potential Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables and any offshore booster substation will be located.

Term	Meaning
Morgan Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Morgan Scoping Report as the area located between Mean High Water Springs (MHWS) at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona Onshore Transmission Infrastructure Scoping Search Area	The area that was presented in the Mona Scoping Report as the area located between Mean High Water Springs (MHWS) at the landfall and the onshore National Grid substation, in which the onshore export cables, onshore substation and other associated onshore transmission infrastructure will be located.
Mona Offshore Cable Corridor	The corridor located between the Mona Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables and the offshore booster substation will be located.
Mona Onshore Cable Corridor	The corridor located between Mean High Water Springs (MHWS) at the landfall and the Mona onshore substation, in which the onshore cable route will be located.
Morgan Onshore Cable Corridor	The corridor is located between Mean High Water Springs (MHWS) at the landfall and the Morgan onshore substation, in which the onshore cable route will be located.
Morgan 440kv Cable Corridor	The corridor from the Morgan onshore substation to the National Grid substation.
Mona 440kV Cable Corridor	The corridor from the Mona onshore substation to the National Grid substation.
Morgan Onshore Infrastructure Search Area	The area within which the ancillary onshore infrastructure forming part of the Morgan Offshore Wind Project will be located.
Mona Onshore Infrastructure Search Area	The area within which the ancillary onshore infrastructure forming part of the Mona Offshore Wind Project will be located.
Offshore Booster Substation	The offshore booster substation (also known as mid-point reactive power compensation substation), located within the Mona/Morgan offshore cable corridor, and required in High Voltage Alternating Current (HVAC) transmission systems only.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Morgan Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore. The offshore substation platforms located within the Mona Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Applicant	Morgan Offshore Wind Limited/ Mona Offshore Wind Limited.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.
Inter-array cables	Cables which connect the wind turbines to each other and to the offshore substation platforms. Inter-array cables will carry the electrical current produced by the wind turbines to the offshore substation platforms.
Interconnector cables	Cables that may be required to interconnect the Offshore Substation Platforms in order to provide redundancy in the case of cable failure elsewhere.

Term	Meaning
Intertidal area	The area between Mean High Water Springs (MHWS) and Mean Low Water Springs (MLWS).
Landfall	The area in which the offshore export cables make contact with land and the transitional area where the offshore cabling connects to the onshore cabling.
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.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project that are not designated in law but are likely to have an interest in the project.
The Planning Inspectorate	The agency responsible for operating the planning process for Nationally Significant Infrastructure Projects (NSIPs).
Relevant Local Planning Authority	The Relevant Local Planning Authority is the Local Authority in respect of an area within which a project is situated, as set out in Section 173 of the Planning Act 2008. Relevant Local Planning Authorities may have responsibility for discharging requirements and some functions pursuant to the Development Consent Order, once made.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Mona Offshore Wind Project. The decision maker with regards to the application for development consent for the Morgan Offshore Wind Project.
Evidence Plan	The Evidence Plan is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) applications for the Mona/Morgan Offshore Wind Project.
Evidence Plan Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
The Northern Wales and Irish Sea Bidding Area	The Northern Wales and Irish Sea Bidding Area was one of four Bidding Areas identified by The Crown Estate through the Offshore Wind Leasing Round 4 process.
Preferred Bidding Areas	The Applicant identified two Preferred Bidding Areas (Morgan and Mona) within the Northern Wales and Irish Sea Bidding Area. In February 2021, The Crown Estate awarded the Applicant the right to develop up to 1.5GW of wind capacity within each of the two Preferred Bidding Areas.
Maximum design scenario	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.

Term	Meaning
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 a DCO to apply for 'deemed marine licences' as part of the DCO process. In addition, licensable activities within 12nm of the Welsh coast require a separate marine licence from NRW. A separate marine licence is required for the offshore export cables and related works located within and between the Mona Array Area and the landfall at MHWS.
Draft NPS	The draft national policy statements for energy that are undergoing consultation.
NPS	The current national policy statements published by the Department of Energy and Climate Change in 2011.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters.
Special Protection Area	Special Protection Areas (SPAs) are selected to protect one or more rare, threatened or vulnerable bird species listed in Annex I of the Birds Directive, or certain regularly occurring migratory species.

## Acronyms

Acronym	Description
BDMPS	Biologically Defined Minimum Population Scales
EIA	Environmental Impact Assessment
EWGs	Expert Working Group
HRA	Habitat Regulations Assessment
IAQM	Institute of Air Quality Management
IMWWG	Inter-Agency Marine Mammal Working Group
ISAA	Information to Support an Appropriate Assessment
LSE	Likely Significant Effect
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MU	Management Unit
OSPs	Offshore Substation Platform
PEIR	Preliminary Environmental Impact Assessment Report
SAC	Special Area of Conservation
SOSS	Strategic Ornithological Support Services
SPA	Special Protection Area
SSC	Suspended Sediment Concentration



**MORGAN / MONA OFFSHORE WIND PROJECT**

Acronym	Description
ZOI	Zone of Influence

**Units**

Unit	Description
%	Percentage
km	Kilometres

# 1 LSE SCREENING METHODOLOGY PAPER

## 1.1 Introduction

### 1.1.1 Purpose of the technical note

1.1.1.1 This technical note provides a summary of the methodology to be used for the Likely Significant Effects (LSE) Screening stage of the Habitats Regulations Assessment for both the Mona and Morgan Offshore Wind Projects. The purpose of the note is to outline the process that will be undertaken to identify relevant European sites that will be screened for LSE as part of the Habitats Regulations Assessment, and to allow this approach to be agreed with the Evidence Plan Steering Group prior to consultation on the Preliminary Environmental Impact Report (PEIR).

1.1.1.2 It should be noted that this technical note does not list sites considered for LSE, a full list of sites will be presented separately in the full LSE Screening report for the Morgan and Mona Offshore Wind Projects.

### 1.1.2 Project overviews

#### Mona Offshore Wind Project

1.1.2.1 The Mona Offshore Wind Project encompasses the following as per the Mona Offshore Wind Project Environmental Impact Assessment Scoping Report<sup>1</sup>:

- Mona Array Area: The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located
- Mona Offshore Cable Corridor: The corridor located between the Morgan Array Area and the landfall up to Mean High Water Springs (MHWS), in which the offshore export cables and the offshore booster substation will be located
- Mona Onshore Cable Corridor: The corridor located between Mean High Water Springs (MHWS) at the landfall and the Mona onshore substation, in which the onshore cable route will be located.

#### Morgan Offshore Wind Project

1.1.2.2 The Morgan Offshore Wind Project encompasses the following as per the Morgan Offshore Wind Project Environmental Impact Assessment Scoping Report<sup>2</sup>:

- Morgan Array Area: The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Mona Offshore Wind Project will be located.

1.1.2.3 In line with the Morgan Offshore Wind Project Environmental Impact Assessment Scoping Report the Applicant prepares for delivering a coordinated grid connection with the Morecambe Offshore Wind Farm. The scoping search area for the coordinated offshore and onshore transmission assets is currently being defined and is therefore not considered in the LSE Screening methodology at this stage.

### 1.1.3 Process for identifying sites and features

1.1.3.1 To facilitate the identification of the European sites and features to be considered in the LSE screening for the Morgan and Mona Offshore Wind Projects, a pre-screening of sites has been undertaken. This is considered to be appropriate due to the large spatial scale of the Morgan and Mona Offshore Wind Projects, the wide ranging nature of many of the features of European sites which may be affected (e.g. birds and marine mammals) and therefore the number of European sites which could potentially be affected.

1.1.3.2 The criteria adopted for the initial identification of European sites are outlined in Table 1.1. This approach takes account of the location of the European sites (including Ramsar Sites) in relation to the Morgan and Mona Offshore Wind Projects, the anticipated zone of influence (ZOI) of potential impacts associated with the Morgan and Mona Offshore Wind Projects, and the ecology and distribution of qualifying interest features.

1.1.3.3 Table 1.1 outlines the order of consideration given to the criteria used for the identification of the list of sites to be taken forward for determination of LSE. Initial consideration is given to whether there is a physical overlap between the Morgan and Mona Offshore Wind Projects and any European sites; all sites with an overlapping boundary are screened in to be taken forward for determination of LSE.

1.1.3.4 Pre-screening criterion 2 next identifies any European sites, not already screened in using criterion 1, where there is an overlap between the Morgan and Mona Offshore Wind Projects and the range of any qualifying mobile species of the site. All sites where the Morgan and Mona Offshore Wind Project boundary overlaps with the range of one (or more) of its features, are taken forward for determination of LSE.

1.1.3.5 Criterion 3 identifies any European sites, not already screened in by criterion 1 or 2, where the potential ZOI of the Morgan and Mona Offshore Wind Projects overlaps with a European site and/or qualifying interests of the site (as per section 4). For ornithology receptors, consideration is also given to a range of factors that inform the likely extent to which the different qualifying features will occur on the Morgan and Mona Offshore Wind Project sites (e.g. scarcity of records of the relevant species during the baseline surveys).

<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010137/EN010137-000011-EN010137%20-%20Scoping%20Report.pdf>

<sup>2</sup> <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010136/EN010136-000039-Morgan%20Offshore%20Wind%20Farm%20-%20EIA%20Scoping%20Report.pdf>

**Table 1.1: Criteria for initial identification of relevant European sites**

Order of consideration	Criteria used for initial identification of relevant European sites
1	The site boundaries of the Morgan/Mona Offshore Wind Projects overlap with one or more European sites.
2	European or Ramsar site with qualifying mobile features/species (e.g. Annex I birds, Annex II marine mammals, migratory fish, otter) whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Morgan/Mona Offshore Wind Projects.
3	European sites and/or qualifying interest features located within the potential ZOI of impacts associated with the Mona Offshore Wind Project (e.g. habitat loss/disturbance, noise and risk of collision).

1.1.3.6 The outcome of this initial screening will be that sites where there is no potential for LSEs due to lack of potential overlap of receptor-impact pathway to occur are excluded from further consideration in this report. Sites not excluded on the basis of any of the criteria outlined in Table 1.1 (i.e. where there is a potential for a receptor-impact pathway to occur) will be taken forward for determination of LSE.

1.1.3.7 It should be noted that the LSE Screening may be updated, as appropriate, during the pre-application phase of the Project to account for site specific survey data, detailed assessments and stakeholder feedback which may result in some features or sites being excluded from consideration in the Appropriate Assessment, due to a lack of LSE. Any such updates would be discussed and agreed with the Evidence Plan Steering Group and Expert Working Groups (EWGs) as appropriate.

#### 1.1.4 Legislation and Guidance

1.1.4.1 The LSE Screening Methodology outlined in this document has drawn upon a number of information sources, Habitats Regulations Assessment (HRA) principles, regulations and guidance documents, including:

- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 2017 EIA Regulations)
- The Planning Inspectorate Advice Note Seven: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping (The Planning Inspectorate, 2020a)
- The Habitats Regulations Assessment Handbook (DTA Publications Limited, 2016)
- The Crown Estate Plan Level HRA
- Feedback received from the Mona and Morgan Evidence Plan Process to date.

## 1.2 Identification of European Sites and features

1.2.1.1 This section provides the approach to identifying European sites (including Ramsar Sites), and their features, for which there is the potential for connectivity with the Morgan/Mona Offshore Wind Projects, using the criteria outlined in Table 1.1, and therefore those which should be taken forward for consideration of LSE.

1.2.1.2 Each of the following receptor groups are considered in turn:

- Annex I habitats (offshore and coastal) (see section 1.2.2)
- Annex II diadromous fish species (see section 1.2.3)
- Annex II marine mammals (see section 1.2.4)
- Annex I habitats (onshore) (see section 1.2.5)
- Annex II species (onshore) (see section 1.2.6)
- Annex I marine ornithological features (see section 1.2.7)
- Annex I onshore ornithological features (see section 1.2.8).

### 1.2.2 Sites designated for Annex I habitats (offshore and coastal)

1.2.2.1 The following section details the stepwise process to identify the European sites with relevant Annex I habitats (offshore and coastal) to be taken forward for detailed determination of LSE based on the methodology and criteria outlined in section 1.1.3 and Table 1.1.

1.2.2.2 The approach adopted will focus on the Annex I benthic habitat qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

#### Initial identification for Annex I habitats (offshore and coastal)

##### Criterion 1

1.2.2.3 Criterion 1 for the identification of European or Ramsar sites for Annex I habitats offshore and coastal (i.e. below MHWS)<sup>3</sup> to be taken forward for consideration of LSE considers those sites which overlap with the offshore and coastal boundaries of the Morgan/Mona Offshore Wind Projects.

##### Criterion 2

1.2.2.4 Criterion 2 considers European or Ramsar sites with qualifying mobile features/species whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Morgan/Mona Offshore Wind Projects.

<sup>3</sup> For the purpose of LSE Screening, Annex I habitats offshore and coastal encompass those below MHWS, listed as 'Marine, coastal and halophytic habitats' by JNCC, <https://sac.jncc.gov.uk/habitat/>

**Criterion 3**

- 1.2.2.5 Criterion 3 considers European or Ramsar sites and/or qualifying interest features which are located within the potential ZOI of impacts associated with the Morgan/Mona Offshore Wind Projects. There is the potential for indirect effects to sites designated for Annex I habitats as a result of impacts associated with increased Suspended Sediment Concentrations (SSC) arising from construction activities or from changes to the hydrodynamic regime as a result of the presence of offshore infrastructure associated with the Morgan/Mona Offshore Wind Projects.
- 1.2.2.6 The extent of these impacts is considered likely to extend beyond the boundaries of the Morgan/Mona Offshore Wind Projects.
- 1.2.2.7 The ZOI for such indirect effects associated with the offshore elements of the Morgan/Mona Offshore Wind Projects is typically defined from the outputs of physical processes modelling to determine, for example, the fate of sediments resuspended during the construction process. Physical processes modelling will be undertaken for the Morgan/Mona Offshore Wind Projects to inform the Environmental Impact Assessment (EIA) and Information to Support the Appropriate Assessment (ISAA); however this will not have been carried out at LSE Screening stage. Therefore, a buffer of one mean spring tidal excursion has been considered to inform this area.
- 1.2.2.8 One mean tidal excursion in the vicinity of the Morgan/Mona Offshore Wind Projects equates to approximately 9km in the northeast and southwest direction and 3km in the northwest/southeast direction from the Array Areas and 7km in a northeast/southwest direction and 2km in a northwest/southeast direction in relation to the Cable Corridors. For the purposes of LSE screening, a precautionary approach will be adopted, and this buffer has been increased to 15km. This buffer is considered to be sufficiently precautionary to capture all sites likely to be in the ZOI from indirect effects associated with construction activities.

**1.2.3 Sites designated for Annex II diadromous fish**

- 1.2.3.1 The following sections detail the approach to identifying the European sites with relevant Annex II diadromous fish species to be taken forward for detailed determination of LSE based on the methodology and criteria outlined in section 1.1.3 and Table 1.1.
- 1.2.3.2 The approach adopted will focus on the Annex II diadromous fish qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

**Initial identification for Annex II fish****Criterion 1**

- 1.2.3.3 Criterion 1 considers European or Ramsar sites which overlap with the boundaries of the Morgan/Mona Offshore Wind Projects.

**Criterion 2**

- 1.2.3.4 Criterion 2 considers European or Ramsar sites with qualifying mobile features/species whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Morgan/Mona Offshore Wind Projects.
- 1.2.3.5 There is the potential for activities associated with the construction, operation and maintenance and decommissioning of the Morgan/Mona Offshore Wind Projects to result in impacts on Annex II diadromous fish species at a distance from the European sites for which they are qualifying interest features on the basis that these species are mobile and utilise both freshwater and marine environments throughout their life cycles. A precautionary approach to the identification of relevant sites will be adopted in order to capture all sites with the potential for connectivity with the Morgan/Mona Offshore Wind Projects, and in particular to consider the potential for disruption to migration (i.e. barriers to migration) of diadromous fish (including but not limited to Atlantic salmon) to/from natal rivers (river of origin). For the purposes of LSE screening, a precautionary approach has been adopted using a buffer of 100km. After consideration of the likely migratory routes and distances for diadromous fish as outlined in ABPmer (2014), 100km is considered an appropriate buffer, in line with guidance from the Plan Level HRA (The Crown Estate, 2021). Given the location of the project within the eastern Irish Sea it is unlikely that any Special Areas of Conservation (SACs) outside the 100km buffer would be affected by any of the predicted impacts, as migratory routes of Annex II fish species associated with those SACs would be unaffected by the Morgan/Mona Offshore Wind Projects. However, in line with a precautionary approach, sites located just outside the 100km buffer (i.e. River Bladnoch SAC and Solway Firth SAC for the Mona Offshore Wind Project) will also be included. For example, sites which flow into the eastern Irish Sea and 100km buffer and therefore may have potential connectivity with the Morgan/Mona Offshore Wind Projects. SACs (i.e. comprising rivers and estuaries) beyond this buffer are not connected to the eastern Irish Sea (e.g. flow into the Atlantic Ocean, Celtic Sea or western Irish Sea) and therefore diadromous fish associated with these sites are unlikely to interact with the Morgan and Mona Offshore Wind Projects and as such will not lead to a LSE

**Criterion 3**

- 1.2.3.6 Criterion 3 considers European or Ramsar sites and/or qualifying interest features which are located within the potential ZOI of impacts associated with the Morgan/Mona Offshore Wind Projects (e.g. habitat loss/disturbance, noise and risk of collision). Given the large buffer proposed for criterion 2 above (100km), the ZOI for key impacts to migratory fish species (i.e. underwater noise, habitat loss and increased SSC) are anticipated to be well within this range. It is not anticipated that any additional European sites with Annex II diadromous fish as qualifying features, beyond those already identified for criterion 2, will be screened in for further consideration on the basis of criterion 3.

**1.2.4 Sites designated for Annex II marine mammals**

- 1.2.4.1 Based on data collected to date during aerial surveys and information on marine mammal species in the Irish Sea from desk based studies for the Morgan/Mona Offshore Wind Projects, the Annex II marine mammal species likely to occur in the

vicinity of the Morgan/Mona Offshore Wind Projects and therefore considered in the LSE screening are:

- Harbour porpoise *Phocoena phocoena*
- Bottlenose dolphin *Tursiops truncatus*
- Grey seal *Halichoerus grypus*
- Harbour seal *Phoca vitulina*.

1.2.4.2 The following species were included in the Mona and Morgan Offshore Wind Project Scoping Reports and therefore have the potential to occur within the Morgan and Mona Offshore Wind Project areas, however these species are listed under Annex IV rather than Annex II of the EC Habitats Directive and therefore do not have SACs designated for them and will therefore be assessed within the marine mammal PEIR chapter and are not considered further within this document:

- Minke whale *Balaenoptera acutorostrata*
- White beaked dolphin *Lagenorhynchus albirostris*
- Short beaked common dolphin *Delphinus delphis*
- Risso's dolphin *Grampus griseus*.

#### Initial identification for Annex II marine mammals

1.2.4.3 The following sections detail the stepwise process to identify the European sites with relevant Annex II marine mammals as qualifying features to be taken forward for detailed determination of LSE based on the methodology and criteria outlined in section 1.1.3 and Table 1.1.

1.2.4.4 The approach will focus on the Annex II marine mammal qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

#### Criterion 1

1.2.4.5 Criterion 1 considers European or Ramsar sites which overlap with the boundaries of the Morgan/Mona Offshore Wind Projects. There are no sites with Annex II marine mammal species as qualifying features which overlap with the Morgan/Mona Offshore Wind Projects, therefore it is anticipated that no sites will be screened in for further consideration for marine mammals on the basis of this criterion.

#### Criterion 2

1.2.4.6 Criterion 2 considers European or Ramsar sites with qualifying mobile species whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Morgan/Mona Offshore Wind Projects. There is the potential for activities associated with the construction, operation and maintenance and decommissioning of the Morgan/Mona Offshore Wind Projects to result in impacts on Annex II marine mammal species at distance from the sites for which they are

qualifying interest features on the basis that these are highly mobile species which potentially forage and migrate over wide areas. The relevant ranges for the different marine mammal receptors are discussed in the following paragraphs.

#### Harbour porpoise

1.2.4.7 A precautionary approach to the identification of relevant sites for harbour porpoise will be adopted in order to capture all sites with the potential for connectivity with the Morgan/Mona Offshore Wind Projects based on criterion 2. On this basis, it has been considered that sites with harbour porpoise as qualifying interest features which are located within the same Management Unit (MU) defined by Inter-Agency Marine Mammal Working Group (IMWWG) (2015)) as the Morgan/Mona Offshore Wind Projects will be screened for LSE. For harbour porpoise all sites within the Celtic and Irish Seas MU will be considered.

#### Bottlenose dolphin

1.2.4.8 A precautionary approach to the identification of relevant sites for bottlenose dolphin will be adopted in order to capture all sites with the potential for connectivity with the Morgan/Mona Offshore Wind Projects based on criterion 2. On this basis, it has been considered that sites with bottlenose dolphin as qualifying interest features which are located within the same MU defined by IMWWG (2015) as the Morgan/Mona Offshore Wind Projects will be screened for LSE. For bottlenose dolphin therefore all sites within the Irish Sea MU will be considered.

#### Grey seal

1.2.4.9 All SACs designated for grey seals located within the same Seal MUs (SCOS, 2020) as the Morgan/Mona Offshore Wind Projects (i.e. the Wales MU, North West England MU, SW Scotland and Northern Ireland MU) will be screened for LSE. A screening range of 100km has also been adopted to identify sites with grey seal as a qualifying feature for inclusion in the assessment of LSE, which is based on the latest advice regarding the typical foraging range of this species from haul out sites (SCOC, 2018). No additional sites were identified within this range.

#### Harbour seal

1.2.4.10 All SACs designated for harbour seal located within the same seal MUs (SCOS, 2020) as the Morgan/Mona Offshore Wind Projects (the Wales and North West England MU) will be considered in the LSE screening report. In addition, a screening range has been applied to identify sites for inclusion in the assessment of LSE for harbour seal which is based on the typical foraging range of this species. Harbour seals tend to make relatively short foraging trips from haul out sites and the latest Special Committee on Seal (SCOS) report (SCOS, 2020) states that harbour seals typically forage at distances of 40 to 50km from haul out sites. Although some individuals do occasionally make longer trips, these are often associated with young animals dispersing from sites and are therefore not considered to indicate likely repeated connectivity between European sites and the Morgan/Mona Offshore Wind Projects.

1.2.4.11 The screening process for harbour seal includes any European site where the species is considered as a qualifying feature.

**Criterion 3**

1.2.4.12 Criterion 3 considers European sites and/or qualifying interest features which are located within the potential ZOI of impacts associated with the Morgan/Mona Offshore Wind Projects (e.g. habitat loss/disturbance, noise and risk of collision). Given the large buffers proposed above for both cetaceans and pinnipeds in criterion 2, the ZOI for key impacts to marine mammals (i.e. underwater noise and changes to prey species) are anticipated to be well within this area. It is anticipated that no additional European sites have marine mammal species as qualifying features, beyond those already identified for criterion 2. Therefore, no additional sites will be screened in for further consideration on the basis of this criterion.

**1.2.5 Sites designated for Annex I habitats (onshore)**

1.2.5.1 The following section details the stepwise process to identify the European sites with relevant onshore Annex I habitats, above MHWS<sup>4</sup>, to be taken forward for detailed determination of LSE based on the methodology and criteria outlined in section 1.1.3 and Table 1.1.

1.2.5.2 The approach focusses on the Annex I habitat qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

**Initial identification for Annex I habitats (onshore)****Criterion 1**

1.2.5.3 Criterion 1 for the identification of European or Ramsar sites to be taken forward for consideration of LSE considers those sites which overlap with the boundaries of the Morgan/Mona Offshore Wind Projects. There are no European sites with relevant qualifying Annex I habitats which overlap with the Morgan/Mona Offshore Wind Projects site.

**Criterion 2**

1.2.5.4 Criterion 2 considers European or Ramsar sites with qualifying mobile features/species whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Morgan/Mona Offshore Wind Projects. There are no European sites which meet this criterion for Annex I habitats and so no sites will be screened in for further consideration on this basis.

**Criterion 3**

1.2.5.5 Criterion 3 considers European or Ramsar sites and/or qualifying interest features which are located within the potential ZOI of impacts associated with the

Morgan/Mona Offshore Wind Projects. There is the potential for indirect effects to sites designated for onshore Annex I habitats as a result of airborne pollutants associated with construction or decommissioning activities.

1.2.5.6 The ZOI for such indirect effects associated with the onshore elements of the Morgan/Mona Offshore Wind Projects is defined as 350m. According to guidance from the Institute of Air Quality Management (IAQM), an assessment of air pollutant impacts is required where there are sensitive receptors within 350m of the Morgan/Mona Offshore Wind Projects site. The guidance also states an assessment for ecological receptors should consider an impact zone of up to 50m from the site boundary. The Highways Agency 2007 refers to a 200m impact zone for ecological receptors in internationally (and nationally) designated sites. Therefore, a precautionary approach of 350m has been adopted, which is considered large enough to encompass all direct and indirect impacts on Annex I habitats (onshore) associated with the Morgan/Mona Offshore Wind Projects.

**1.2.6 Sites Designated for Annex II species (onshore)**

1.2.6.1 The following section details the results of the stepwise process to identify the European sites with Annex II species (onshore) as a feature, to be taken forward for detailed determination of LSE based on the methodology and criteria outlined in section 2.4 and Table 2.1.

1.2.6.2 With regard to Annex II terrestrial species, only SACs for otter are located within species-relevant ZOI, and therefore only otter will be considered in the LSE Screening Report. For bats, a ZOI of 10km is considered appropriate, based on a 5-10km typical home range (between summer and winter roosts) (Collins *et al.*, 2016 cited: Bat Conservation Trust/BMT Cordah Ltd, 2005), the closest SAC for lesser horseshoe bats is located approximately 20km away and therefore outside of the ZOI. For great-crested newt *Triturus cristatus* 2km is considered an appropriate buffer due to most great crested newt activity being recorded within 250m of a breeding pond, and dispersal distances being up to around 1.3km (e.g. English Nature 2001), the closest SAC located is approximately 23km from the Morgan/Mona Offshore Wind Projects. As such, only otter are considered further.

1.2.6.3 The approach adopted for this LSE screening report focusses on the Annex II otter qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

**Initial identification for Annex II otter****Criterion 1**

1.2.6.4 Criterion 1 considers European or Ramsar sites which overlap with the boundaries of the Proposed Development. As there are no European sites with Annex II otter as

<sup>4</sup> For the purpose of LSE Screening, Annex I habitats onshore encompass those above MHWS, listed as 'Coastal sand dunes and continental dunes' by JNCC, <https://sac.jncc.gov.uk/habitat/>

qualifying features which overlap with the Proposed Development, no sites are screened in for further consideration for otter on the basis of this criterion.

### Criterion 2

- 1.2.6.5 Criterion 2 considers European or Ramsar sites with qualifying mobile features/species whose range (e.g. foraging, migratory, overwintering, breeding or natural habitat range) overlaps with the Proposed Development.
- 1.2.6.6 Otters can have relatively large home ranges and can travel considerable distances in one night, particularly during dispersal (e.g. more than 20km, cited in Chanin 2003; or an estimated average home range of 27km, Harris *et al* 1995, cited in Chanin 2003). However, territories and distances travelled can vary considerably depending on the resources available.
- 1.2.6.7 Therefore, there is some potential for activities associated with the Proposed Development to result in impacts on Annex II otter at a distance from the European sites for which they are qualifying interest features, on the basis that these species are mobile and utilise both aquatic and terrestrial habitats throughout their life cycles.
- 1.2.6.8 Sites within the 27km buffer will therefore be considered further.

### Criterion 3

- 1.2.6.9 Criterion 3 considers European or Ramsar sites and/or qualifying interest features which are located within the potential ZOI of impacts associated with the Proposed Development (e.g. habitat loss/disturbance). Given the large buffer associated with criterion 2 above, the ZOI for key impacts to otter are anticipated to be well within this range. No additional European sites with Annex II otter as qualifying features, beyond those already identified for criterion 2, are therefore screened in for further consideration on the basis of criterion 3.

## 1.2.7 Sites designated for marine ornithological features

### Initial identification for marine ornithological features

#### Defining the qualifying features and sites: broad-scale considerations

- 1.2.7.1 Birds present in offshore waters and potentially affected by the construction, operation and decommissioning of the Morgan/Mona Offshore Wind Projects will be predominantly seabirds (defined for this report as auks, gulls, terns, gannets, skuas, shearwaters, petrels, cormorants and divers) and seaducks. These species have the potential to be present in the vicinity of the Morgan/Mona Offshore Wind Projects during the breeding and non-breeding seasons (including the spring and autumn passage periods). Other bird species that may be affected by the Morgan/Mona Offshore Wind Projects include those which may fly through the area of the Morgan/Mona Offshore Wind Projects during their spring and/or autumn migration (or passage) periods (e.g. waterbirds), and any other species which may use the intertidal habitats or the inshore or offshore waters which are potentially affected by the Morgan/Mona Offshore Wind Projects.

- 1.2.7.2 Based on the above, it is considered that (in relation to marine ornithology) the Special Protection Areas (SPAs) (and Ramsar sites) which have the potential to be affected by the Morgan/Mona Offshore Wind Projects are those which:

- Overlap with the location of the Morgan/Mona Offshore Wind Projects, or with the area in which potential effects from the Morgan/Mona Offshore Wind Projects could extend (e.g. displacement effects extending beyond the boundary of the array area)
- Include seabird qualifying features that use the waters and habitats in and around the Morgan/Mona Offshore Wind Projects (e.g. for foraging)
- Include qualifying features which may fly through the area of the Morgan/Mona Offshore Wind Projects during migration.

- 1.2.7.3 The SPAs (and Ramsar sites) which meet these different criteria are outlined below under the categories of:

- Marine SPAs
- Breeding seabird colony SPAs (and Ramsar sites)
- SPAs (and Ramsar sites) with migratory waterbird qualifying features (subsequently termed migratory waterbird SPAs for convenience, with waterbirds defined for this report as waders, ducks, geese, swans, grebes, divers, gulls, terns and cormorants)
- Other SPAs (and Ramsar sites) which are located within the ZOI of the Morgan/Mona Offshore Wind Projects.

#### Marine SPAs

- 1.2.7.4 Marine SPAs located within the initial area of search will also be considered for LSE. Where there is overlap with the SPA, all qualifying features of the SPA will be considered for determination of LSE.

#### Breeding SPAs

- 1.2.7.5 Seabird species may have large foraging ranges during the breeding season (Table 1.2, Woodward *et al.*, 2019). Therefore, the Morgan/Mona Offshore Wind Projects could potentially have an effect on seabird qualifying features from a large number of SPA breeding colonies. Indeed, the area within which it is located may be used by these qualifying features when foraging or when commuting between the colony and foraging areas. Furthermore, seabird qualifying features from SPA breeding colonies may use, or fly through, the area occupied by the Morgan/Mona Offshore Wind Projects during the non-breeding season, when these populations are widely distributed and not constrained by the need to return to the colony.
- 1.2.7.6 To determine the breeding seabird colony SPAs which may have connectivity with the Morgan/Mona Offshore Wind Projects, those SPAs located in UK Western Waters, the English Channel and Ireland will be considered.

**Table 1.2: Mean maximum foraging ranges of breeding seabirds (from Woodward *et al.*, 2019)**

\*No SD available for mean maximum value.

\*\*Mean value without SD – no mean maximum value available.

Species	Mean maximum foraging range (km) ± 1 Standard Deviation (SD)	Maximum foraging range (km)
Red-throated diver <i>Gavia stellata</i>	9.0*	9
Leach's storm-petrel <i>Oceanodroma leucorhoa</i>	657.0**	N/A
European storm-petrel <i>Hydrobates pelagicus</i>	336.0*	336
Northern fulmar <i>Fulmarus glacialis</i>	542.3 ± 657.9	2736
Manx shearwater <i>Puffinus puffinus</i>	1346.0 ± 1018.7	2890
Northern gannet <i>Morus bassanus</i>	315.2 ± 194.2	709
European shag <i>Phalacrocorax aristotelis</i>	13.2 ± 10.5	46
Cormorant <i>Phalacrocorax carbo</i>	25.6 ± 8.3	35
Black-legged kittiwake <i>Rissa tridactyla</i>	156.1 ± 144.5	770
Black-headed gull <i>Chroicocephalus ridibundus</i>	18.5*	19
Common gull <i>Larus canus</i>	50.0*	50
Great black-backed gull <i>Larus marinus</i>	73.0*	73
Herring gull <i>Larus argentatus</i>	58.8 ± 26.8	92
Lesser black-backed gull <i>Larus fuscus</i>	127.0 ± 109	533
Sandwich tern <i>Thalasseus sandvicensis</i>	34.3 ± 23.2	80
Little tern <i>Sternula albifrons</i>	5.0*	5
Arctic tern <i>Sterna paradisaea</i>	25.7 ± 14.8	46
Common tern <i>Sterna hirundo</i>	17.6 ± 9.1	30
Roseate tern <i>Sterna dougallii</i>	12.6 ± 10.6	23.9
Great skua <i>Stercorarius skua</i>	443.3 ± 487.9	1003
Arctic skua <i>Stercorarius parasiticus</i>	2 ± 0.7***	NA
Razorbill <i>Alca torda</i>	88.7 ± 75.9	313 (191)*
Common guillemot <i>Uria aalge</i>	73.2 ± 80.5	338 (135)*
Black guillemot <i>Cepphus grylle</i>	4.8 ± 4.3	

Species	Mean maximum foraging range (km) ± 1 Standard Deviation (SD)	Maximum foraging range (km)
Atlantic puffin <i>Fratercula arctica</i>	137.1 ± 128.3	383

**Connectivity in the breeding season**

1.2.7.7 The initial stage in establishing potential connectivity during the breeding season will involve determining whether either the Morgan/Mona Array Area or Offshore Cable Corridors are within (i) the mean maximum foraging range plus 1 SD of each qualifying feature from each of the SPAs and (ii) the maximum foraging range of each qualifying feature from each of the SPAs (Table 1.2, Woodward *et al.*, 2019).

**Seabird connectivity in the non-breeding season and migration periods**

1.2.7.8 As well as true pelagic seabirds (e.g. gannet, fulmars and auks), other species that spend part of their annual life cycle at sea (e.g. divers, gulls and seaducks) are present during the non-breeding season and migration periods.

1.2.7.9 Seabird species that are breeding interest features at SPA sites further north or west of the Morgan/Mona Offshore Wind Projects may pass through the area or reside in the area in winter. The identification of migrating corridors and wintering areas for seabirds can be drawn from the Migration Atlas (Wernham *et al.*, 2002) and the Eurasian African Migration Atlas (Franks *et al.*, 2022). Furthermore, the Strategic Ornithological Support Services (SOSS)-05 report for The Crown Estate (Wright *et al.*, 2012) details bird migration routes for key migratory birds in relation to offshore wind developments (Round 3, Round 1 and 2 and Scottish Territorial Waters developments). Furness (2015) presents the total number of birds present in all UK territorial waters during the defined season (e.g. migration periods and winter) for each spatially distinct Biologically Defined Minimum Population Scales (BDMPS) e.g. UK Western Waters.

1.2.7.10 However, most seabirds (i.e. northern fulmar, Manx shearwater, petrels and auks) are dispersive in their migration rather than following migratory corridors, and the above guidance is therefore limited. With the advance of modern telemetry, there is a better understanding of seabird migration routes and the use of wintering areas, although it is difficult to generalise movements and usage given the relatively low sample size of tracked birds.

1.2.7.11 Nevertheless, there is potential for breeding interest features at SPA colonies along the Irish Sea or from further north (i.e. west and north coast of Scotland) to travel through and winter in the Mona Array Area. Colonies located in the 'UK Western Waters' BDMPS defined by Furness (2015) will be included. This BDMPS excludes seabird colonies in the northeast coast of Scotland and Orkney and Shetland. As the 'UK Western Waters' BDMPS excluded colonies in the Republic of Ireland, seabird colonies on the east coast of Ireland have been included for consideration in the LSE Screening.



### Migratory waterbird SPAs (and Ramsar Sites)

- 1.2.7.12 The British Isles are located along the East Atlantic Flyway - a migration route that connects bird species' breeding sites to wintering sites (Boere *et al.*, 2006). Therefore, the British Isles are of key importance for many over-wintering and migrating birds that move through the area in large numbers during the spring and autumn passage periods. Whilst some bird species will follow the coastline during their migration journey, other groups of species (e.g. waders) will undertake long journeys across open seas, often flying at high altitudes depending on the weather conditions. Wildfowl species are known to follow a coastal route during their migration (when in sight of the land). However, many wildfowl species do undertake open-sea movements to reach their wintering or moulting grounds (e.g. Shelduck (*Tadorna tardorna*) (Green *et al.*, 2019)).
- 1.2.7.13 Periodic numbers of waterbirds (e.g. wildfowl and waders) may therefore pass through the Morgan/Mona Offshore Wind Projects in spring and autumn. Many of these migrants will originate from the Arctic and sub-Arctic regions (e.g., Iceland and Scandinavia) and winter at SPA sites in the UK. Although migration occur over a broad front and often at high altitude at sea, there is a potential for migratory waterbirds to cross the Morgan/Mona Offshore Wind Projects twice per year. The connectivity is more likely to occur with SPA sites the nearest to the Morgan/Mona Offshore Wind Projects, as it is assumed that migration routes will be broader and more dispersed with increased distance to/from the wintering sites. There are several wetland sites with wintering and passage interest features along the Welsh and English Coast.
- 1.2.7.14 SPAs with migratory waterbird qualifying features will be identified by conducting a thorough review of the SPAs and associated qualifying features within the vicinity of the Morgan/Mona Offshore Wind Projects and consideration of whether the direction of migratory pathways could have the potential to interact with the Morgan/Mona Offshore Wind Projects. Broadly, a buffer of approximately 100km will be used to identify sites, although the decision to screen sites into the LSE will depend on the location of the Proposed Development relative to migratory routes for the relevant qualifying interest features.

### Other SPAs (and Ramsar sites) within the ZOI

- 1.2.7.15 The potential ZOI of impacts associated with the Morgan/Mona Offshore Wind Projects (e.g. habitat loss/disturbance, noise and risk of collision) is considered to be limited to the area within 2km of the Morgan/Mona Offshore Wind Projects for most bird species, which is the area over which displacement effects are potentially considered to occur. This may extend to considerably greater distances for some species, notably red-throated diver, which shows particular sensitivity to various sources of anthropogenic disturbance (e.g. Mendel *et al.*, 2019, Dorsch *et al.*, 2020).
- 1.2.7.16 For the Mona Offshore Wind Project other than the Liverpool Bay SPA (considered above under marine SPAs), no SPAs or Ramsar sites occur within 2km of the Morgan/Mona Offshore Wind Projects.

### 1.2.8 Sites designated for onshore ornithological features

- 1.2.8.1 The following section details the results of the stepwise process to identify the European sites with onshore ornithological features, to be taken forward for detailed

determination of LSE based on the methodology and criteria outlined in section 1.1.3 and Table 1.1.

- 1.2.8.2 The approach adopted for the LSE screening report will focus on the onshore ornithology qualifying interest features for which there is considered to be a potential for impact as a result of the Morgan/Mona Offshore Wind Projects. Whilst only these qualifying interest features will be screened in for further consideration, it is acknowledged that the Competent Authority must undertake the LSE screening, and any subsequent appropriate assessment, at the site level and not for individual qualifying interest features.

#### Initial identification for onshore ornithological features

#### Special Protection Areas (SPAs) designated for wintering and passage waterbirds

- 1.2.8.3 From the low water to the high-water mark, the onshore export cable corridor passes through intertidal habitats. Above the high-water mark, agricultural habitats (arable fields and pasture with hedgerows) dominate the potential onshore export cable corridors to the substation.
- 1.2.8.4 Although the intertidal habitats and coastal habitats do not overlap with SPAs designated for wintering or passage waterbirds, there is potential for waders and wildfowl from adjacent SPAs to use the intertidal habitats during the passage and wintering periods. Waders are known to be faithful to feeding and roosting sites in winter (Van de kam, 2004). There is however some variability between species (e.g. roosting sites Rehfishch *et al.*, 2003) and some inter-individual availability (e.g. territorial versus non-territorial birds). As competition increases and resources are being depleted on the intertidal habitats, waterbirds might need to forage outside their preferred areas to maintain their daily energy requirement. As a result, there is potential for less favoured areas (e.g. outside the SPAs) to be used by birds in winter.
- 1.2.8.5 As birds move through the SPA sites during the passage period, they can also stop and feed in a range of locations outside the SPAs. Coastal pastures and wet marshes outside the boundary of the SPAs can also be used by waterbirds as alternative or complementary foraging areas. Pink-footed geese in particular can travel long distances from their roosting sites (>50km) to feed in agricultural habitats.
- 1.2.8.6 SPAs (and Ramsar sites) with onshore waterbird qualifying features will be identified using expert knowledge and evidence from the literature on migratory routes and foraging range of waterbirds. This will be based on judgement of the sites location and surrounding SPAs designated for wintering waterbirds. A precautionary approach will be taken with sites within 50km of the cable landfall being considered as a starting point.

### 1.3 Summary

- 1.3.1.1 In summary, this note has outlined the proposed methodology which will be carried out in the LSE Screening Report for the Morgan and Mona Offshore Wind Projects. The screening methodology and associated buffers have been determined on a receptor specific basis and are considered to ascertain a high enough level of precaution to ensure that all relevant European sites are considered, and LSE is assessed. The note allows the opportunity for engagement and discussion by the Evidence Plan Steering Group on the methodology outlined, and for an approach to

LSE Screening to be agreed prior to consultation on the Preliminary Environmental Impact Report (PEIR).

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**A.5.3 Response from NRW regarding meeting minutes and LSE  
Screening Methodology Paper**



# Morgan & Mona Offshore Wind Projects: Cable Route Selection and Likely Significant Effects Screening

[REDACTED]  
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22<sup>nd</sup> August 2022

## Introduction

This advice is provided in response to the Cable Route Selection slides within the Morgan and Mona Project Evidence Plan Steering Group Meeting 3 Slide Presentation, and the LSE Screening Methodology Paper presented for consideration by the Mona and Morgan Evidence Plan Steering Group Meeting 3.

NRW advice in this document is provided (under a Discretionary Advice Service agreement) in respect of a proposal which will require an application for which Natural Resources Wales is a Statutory Consultee.

The customer acknowledges that the content of any advice or assistance provided by NRW is advisory only and that it shall not be deemed to bind or in any other way restrict NRW in performing its statutory functions.

The recipient acknowledges that:

- any advice given or materials or documentation provided by NRW do not constrain or bind NRW in respect of its statutory functions or its role as a statutory consultee or any decision NRW may make in relation to any application for a licence or permit;
- any advice given by NRW does not bind NRW in respect of any future representations it may make as statutory consultee or any decision NRW may make in relation to any application for a licence or permit;
- any views or opinions expressed by NRW are without prejudice to the consideration NRW may be required to give to any application or any future representations as statutory consultee or any decision NRW may make in relation to any application for a licence or permit;
- the final decision as to any representations made by NRW as statutory consultee will be based on all the relevant information available to NRW at the time it makes such representations;
- NRW cannot and does not give any guarantee as to the representations it may make as statutory consultee; and,
- any advice given by NRW may be overtaken by changes in available information, law, policy and guidance relevant to the subject matter of the advice.

### Advisors Consulted:

Marine Protected Sites  
Marine and Coastal Physical Processes  
Benthic Ecology  
Marine Ornithology  
Marine & Estuarine Fish  
Marine Water Quality  
Terrestrial Ecology (Protected Sites and Species)

## Advice

### Marine and Coastal Physical Processes

#### LSE Screening:

- NRW (A) agree with the LSE Screening Methodology criteria that have been provided with respect to Marine and Coastal Physical Processes.

#### Cable Route Selection:

- NRW (A) advise that Constable Bank which is an Annex I Sand Bank feature (outside an SAC) is avoided. NRW (A) note that the final cable route selection crosses directly over the sand bank feature. Sandbanks are important to the sediment budget and have a direct role in protecting the coastline from wave attack. Constable Bank is an area of active sand transport. Alteration to the sand bank through sand wave clearance, or scour through cable protection measures could alter the equilibrium conditions of the sand bank and potentially alter the sediment supply to beaches at the coast.
- NRW (A) advise that sand wave clearance should be avoided on Constable Bank as well as placement of cable protection on the bank or adjacent to the bank, which could indirectly alter the morphodynamics of the sand bank feature. NRW (A) reiterate that sandbanks are Annex I habitats that support a wide range of species upon which the conservation objectives of an SAC may be based, all of which can be sensitive to disturbance and changes in morphology. NRW (A) advise that these features are avoided where possible within Welsh SACs.
- NRW (A) encourage the applicant to engage early on with NRW to discuss any potential cable protection that might be placed before and/or after the feature as potential indirect impacts to the morphodynamics of the feature will also need to be considered.
- NRW's advice on Annex I features outside SACs is as follows:

*NRW advises that competent authorities and project promoters should also consider, as far as is reasonably possible, impacts on Habitats Directive Annex I habitats outside of protected sites, to help ensure compliance with the requirements of the Directive. The overarching aim of the Habitats Directive is to achieve favourable conservation status (FCS) of Annex I habitats, and this aim relates to the entire occurrence of a habitat type within its natural range rather than applying only to the occurrences within the SAC network. We therefore consider that the impacts of development or activities on*

*'undesigned' Annex I habitat outside SACs should be assessed and adverse effects minimised or mitigated as far as possible. In addition, Article 10 of the Directive acknowledges the importance of improving the ecological coherence of the Natura 2000 network, and encourages the management of features which support the migration, dispersal and genetic exchange of wild fauna and flora, both within and outside the Natura 2000 sites.*

## Benthic Ecology

### LSE Screening:

- NRW (A) agree with the LSE Screening Methodology criteria that have been provided with respect to Benthic Ecology.

### Cable Route Selection:

- Regarding potential impacts on Annex I Sandbank outside SACs, namely Constable Bank, as outlined above, NRW encourages the applicant to avoid routing through this feature and advises that impacts to this feature are avoided as much as possible i.e. no cable protection to be placed on the feature. Please refer to NRW advice on Annex I features outside SACs, as outlined in the Marine and Coastal Physical Processes Section above.
- Regarding the proposed cable route through the Menai Strait and Conwy Bay SAC, it appears from our feature layers that the cable route may potentially overlap and/or be in very close proximity to Annex I Reef, a feature designated for the Menai Strait and Conwy Bay SAC. NRW (A) advise that the cable route is micro-sited to avoid impacts to any potentially sensitive features within the SAC. Ideally, NRW (A) would advise avoidance of the Menai Strait and Conwy Bay SAC if there remains scope to do so. NRW (A) also advise that no cable rock protection is placed within the SAC.

## Marine Mammals

- Discussions on LSE Screening with respect to Marine Mammals is currently on-going via the Marine Mammal Expert Working Group.

## Marine Ornithology

### LSE Screening:

#### Key Issues

- It is likely that all Welsh SPAs and SSSIs with marine or estuarine bird features should be scoped in at this stage, until surveys are complete and data analysis has been finalised.

### Detailed comments

- NRW (A) advise that all designated sites with named features whose foraging ranges fall within the mean maximum foraging range +1 standard deviation (Mean Max +1SD) in Woodward et al 2019, should be scoped in and included in the screening process. This

represents a relatively quick and straightforward approach to establishing connectivity between a proposal's location and a site's qualifying features, as is required to establish likely significant effects. However, there is the possibility that using this approach could miss out some colonies, therefore a sense check will also need to be done to ensure that all colonies where there is a potential for likely significant effect are included at the screening stage. Assessments should always be based upon the best and most up to date evidence available. Potential impacts on wintering bird features and the potential impacts on birds migrating to and from designated sites, along with estuarine SPA and SSSI features which could be affected by collision risk on migration, should also be included in scoping and screening. Due to the location of the proposed work it is likely that all Welsh SPAs and SSSIs with marine or estuarine bird features should be scoped in at this stage, until surveys are complete and data analysis has been finalised.

## Marine and Estuarine Fish

### LSE Screening:

In Section 1.2.3.5 of the LSE Screening Methodology, the applicant states the following:

*'After consideration of the likely migratory routes for diadromous fish as outlined in ABPmer (2014), 100km is considered an appropriate buffer, in line with guidance from the Plan Level HRA (The Crown Estate, 2021).*

NRW (A) note that with reference to The Crown Estate Round 4 HRA principles, specifically Section 3.6.17 – 3.6.23 Migratory Fish and Freshwater pearl mussel, and Figure 3.1 Proposed regional boundaries for Atlantic salmon (from ABPmer (2014), cited in ABPmer (2018)), that a 100km buffer is used for most diadromous fish except Atlantic Salmon and Fresh Water Pearl Mussel, which use a 'Regional Areas Approach'.

NRW (A) advise that The Crown Estate Round 4 HRA principles are adopted in their original form, or that further justification is provided if they are not.

## Marine Water Quality

### Cable Route Selection:

- With respect to Marine Water Quality, consideration will need to be given to the impact of the development on Bathing Waters and WFD Water Bodies.
- With reference to the proposed Cable Route Selection, there are no designated Shellfish Water Protected Areas, Nitrate Vulnerable Zones or Urban Waste Water Treatment Directive (UWWTD) sensitive areas (eutrophic). There is a UWWTD sensitive area (bathing water) – Rhyl – but this will be considered via inclusion of Bathing Waters.
- Designation of these areas are unlikely to hinder development, but they must be considered in the environmental assessments. Further information can be found online at Water Watch Wales: [Water Watch Wales \(naturalresourceswales.gov.uk\)](https://www.naturalresourceswales.gov.uk) (Select Cycle 3 for the recent classifications). Annual updates on Bathing Water information are available at [Find a bathing water \(data.gov.uk\)](https://data.gov.uk).

## Terrestrial Ecology

### LSE Screening:

- NRW (A) concur with the assessment and conclusions presented with respect to Otter.
- NRW (A) concur with the assessment and conclusions presented with respect to Great Crested Newt.

### Cable Route Selection:

- The Steering Group Slides including the Cable Route Selection, do not appear to identify Traeth Pensarn SSSI as a 'key environmental constraint'. The applicant is correct that the SSSI would not be included in the context of designated Natura 2000 Sites, however, Vegetated Shingle Ridge is an Annex 1 habitat, even if it is not designated as such, and should therefore be a consideration.
- It is not possible to determine from the map provided whether the cable route (up to 1.5 km width) will come onshore within the SSSI or to the side of the SSSI. Excavations for a cable onshore may therefore damage the feature of the SSSI. If undergrounded with a landward out point, the cables within the intertidal would possibly need some form of protection, which may impede the sediment movement critical to the maintenance of the SSSI feature. There is therefore potential for direct and indirect impact on the SSSI feature. It would be useful to discuss the landfall / point of interconnection proposals in more detail as early as possible / via the relevant Expert Working Group.

## References

Woodward, I., Thaxter, C.B., Owen, E. & Cook, A.S.C.P. (2019) Desk-based revision of seabird foraging ranges used for HRA screening. Report by BTO for Niras and TCE. BTO Research Report No. 724. BTO, Thetford.



## **A.5.4 Response from JNCC regarding LSE Screening Methodology Paper**

[REDACTED]  
Senior Marine Consultant  
RPS | Energy  
Goldvale House  
22-41 Church Street West  
Woking  
Surrey  
GU21 6DH

JNCC Reference: OIA-08817  
Date: 22 August 2022

Dear [REDACTED],

**Mona and Morgan Offshore Wind Projects, LSE Screening Methodology Paper:  
Version F01**

Thank you for consulting JNCC on the EnBW and bp Morgan and Mona Offshore Wind Projects LSE Screening Methodology Paper, (Version F01), dated 7 July 2022, which we received on 7 July 2022.

The JNCC advice contained within this minute is provided (under a Discretionary Advice Service agreement) as part of our advisory role relating to nature conservation in UK offshore waters (beyond territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters.

Any advice or assistance provided by JNCC via our Discretionary Advice Service is advisory only, and with reference to the [General terms and conditions for DAS chargeable services](#), JNCC excludes any warranty that the advice provided by its officers represents JNCC's opinion or otherwise binds JNCC when acting as a Statutory Consultee.

The documents reviewed are;

- LSE Screening Methodology Paper for consideration by the Morgan and Mona Evidence Plan Steering Group (Version F01, dated 7 July 2022)

The advice below relates to:

- [Sites designated for Annex I habitats \(offshore\)](#)
- [Sites designated for Annex II Marine Mammals](#)
- [Sites designated for marine ornithological features](#)

## Sites designated for Annex I habitats (offshore)

JNCC are content with the LSE Screening Methodology in respect to Annex I habitats and have no comments at this time.

## Sites designated for Annex II Marine Mammals

JNCC are content with the LSE Screening Methodology in respect to marine mammals and have no comments at this time.

## Sites designated for marine ornithological features

Table 1.2 Manx shearwater foraging range mean max + 1SD is  $1346.8 \pm 1018.7$ km.

Table 1.2 Black-headed gull foraging range max is 18.5km.

Table 1.2 Common tern foraging range mean max + 1SD is  $18 \pm 8.9$ km.

Table 1.2 Roseate tern foraging range max is 24km.

Table 1.2 For razorbill we advise the use of the foraging range within appendix 1 of Woodward et al 2019 which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Razorbill foraging range mean max + 1SD is  $73.8\text{km} \pm 48.4\text{km}$  and max is 191km.

Table 1.2 For guillemot we advise the use of the foraging range within appendix 1 of Woodward et al 2019 which excludes data from Fair Isle where foraging range may have been unusually high as a result of reduced prey availability during the study year. Guillemot foraging range mean max + 1SD is  $55.5\text{km} \pm 39.7\text{km}$  and max is 135km.

Table 1.2 Black guillemot foraging range max is 8km.

1.2.7.15 Note the **SNCB advice** on the spatial extent of displacement impacts to seaducks and diver species other than red-throated diver is 4km, and the spatial extent of displacement impacts to red-throated diver is 10km, making the potential ZOI at least 10km.

Please contact me with any questions regarding the above comments.

Yours sincerely,

[Redacted Signature]

**Offshore Industries Adviser**

Email: [Redacted]

Telephone: 0 [Redacted]

## **A.6. Steering group meeting 4**

### **A.6.1 Meeting minutes**

# MINUTES OF MEETING



Security Classification: Project  
External

**MOM Number** : 20230214\_Morgan and Mona SG **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group meeting 4.

## MINUTES OF MEETING

**MEETING DATE** : 14/02/2023

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : [REDACTED] (RPS)

**ISSUED BY** : [REDACTED]

### PERSONS PRESENT:

- [REDACTED] – bp (GV)
- [REDACTED] – bp (MP)
- [REDACTED] – bp (LH)
- [REDACTED] – EnBW (IK)
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED] – RPS (AP)
- [REDACTED] – JNCC (JW)
- [REDACTED]
- [REDACTED] – MMO (GR)
- [REDACTED] – MMO (AP)
- [REDACTED] – Natural England (EW)
- [REDACTED] – Natural England (LB)
- [REDACTED] – Planning Inspectorate (HT)
- [REDACTED] – Planning Inspectorate (EC)
- [REDACTED] – Planning Inspectorate (AD)
- [REDACTED] – Planning Inspectorate (EP)
- [REDACTED] – Planning Inspectorate (KN)

### APOLOGIES:

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1.	<p><b><u>Project update (presented by MP)</u></b></p> <p>The Applicant is planning to submit the Mona and Morgan Generation Preliminary Environmental Information Reports (PEIR) end of March/ April 2023. Statutory consultation will then take place in April and May 2023. We have increased the duration of statutory consultation to 47 days taking into account the Easter holidays so we hope this will give stakeholders time to read and respond to the PEIRs.</p>		

	<p><i>Post meeting note: The Mona and Morgan Generation PEIRs will be submitted mid-April.</i></p> <p>Only the first year of data from the digital aerial surveys was available to feed into the Morgan Gen PEIR. The surveys end in March 2023 and the full two years of data will be incorporated into the Environmental Statement to accompany the DCO application. The Applicant has reviewed 18 months of surveys and are not expecting any noticeable change from the first year of data.</p> <p>A small section of the intertidal area within the red line boundary was not surveyed in 2022 but an intertidal phase 1 walkover survey will be undertaken in spring/ summer 2023 to cover this area and results included in the Environmental Statement.</p> <p>The benthic subtidal ecology baseline and assessment of the Mona Offshore Cable Corridor in the PEIR relied on desk top data as the site-specific data collection was undertaken in 2022 and the analysis was not available to inform the PEIR. The data will be included in the Environmental Statement.</p> <p>The Applicant will consult with the Expert Working Group (EWG) in summer 2023 to provide an update on the site-specific data and to confirm if there are any changes to the assessment as a result of the second year of data.</p> <p>The Applicant has included gravity base foundations in the Project Design Envelope considered for the PEIR. These foundations were not included in the EIA scoping report however following review of the site-specific ground data the Applicant identified the requirement for further flexibility in foundation options. Suction bucket jackets remain as the maximum design scenario for almost all assessments with the exception of one impact for physical processes relating to the offshore substation platform foundations only (for turbines, suction bucket foundations were the maximum design scenario).</p>		
<p>2.</p>	<p><b><u>PEIR consultation- EWGs (presented by KL)</u></b></p> <p>The focus now is on the approach to agreement as part of the EPP remit and building towards the statement of common ground that will be submitted with or soon after the application for consent. When you read the PEIR we would appreciate it if you could think about agreement on the baseline and assessments, keeping in mind the agreements we are aiming for, for the application – see Evidence Plan Template Remit and Inputs as presented on the slides. If you do not agree with what is in the PEIR, please focus on what the Applicant can provide to get agreement. It is important to note that the HRA and EIA process are a step in the process to agree how the Applicant can build these projects with minimal impact to the environment. The Applicant is looking to get as much agreement as possible before the application.</p> <p>HT- What level of agreement has currently been reached on offshore ornithology apportioning and displacement rates. These have taken up a lot of time in examination of other offshore wind projects. We would</p>	<p><b>Steering group to consider the agreements on the baseline and assessments that the Applicant is aiming for the application when reading the PEIR.</b></p>	<p><b>Q2 2023</b></p>

	<p>recommend that an agreement is reached before examination, where possible.</p> <p>KL- In general, we have good agreement on the broad approach to baseline characterisation and assessment (e.g. modelling input parameters etc.). The Applicant has a few actions to look at between the PEIR and the Environmental Statement. We also have good progress with the EWG for parameters used in the assessment.</p> <p>HT- If agreement cannot be reached before the application for development consent is submitted, the Inspectorate advises the Applicant to submit alternative versions of the assessment using the parameters preferred by each party as it is probable that this would otherwise be sought during an Examination.</p>		
<p>3.</p>	<p><b><u>LSE Screening methodology (Presented by KL)</u></b></p> <p>We discussed the approach to LSE screening with the steering group in July 2022. We described the slightly different approach that has been taken for the Mona and Morgan Gen PEIRs. Following this, we have had clear feedback from stakeholders on the approach to LSE Screening and therefore would like to discuss a compromise approach for the final application.</p> <p>Approach taken in the PEIR is that the apportioning assessment has been used to identify the SPAs and qualifying features where a risk of LSE could not be excluded. Where mortalities were &lt;1 individual they were screened out from the assessment as LSE could be ruled out alone and in-combination.</p> <p>Where mortalities identified from apportioning were &gt;1 individual, these sites were screened in, with a particular focus on ‘in combination’ effects. Where mortality was &lt;1 these sites were screened out. This is based on the worst-case scenario where the layers of conservatism in the displacement and CRM analysis as well as the maximum design parameters used (e.g. for displacement the maximum mortalities associated with the greatest displacement, up to 70% displacement, and the greatest mortality rates, up to 10%) should ensure a precautionary approach. If more realistic/ less conservative assumptions are made (e.g. lower displacement and mortality rates), the numbers of birds affected are reduced considerably.</p> <p>For those sites that have been taken forward to the appropriate assessment i.e. where there is the potential for more than one bird to be affected, only very small numbers have been identified both in absolute numbers and as a proportion of the background mortality for the relevant SPAs (see slide showing mortalities for guillemot at Lambay Island and Ireland’s Eye SPAs). These are against background mortalities of hundreds or thousands of individuals per annum (i.e. therefore the in-combination impacts are well within background variation). If all sites with potential connectivity with the Mona and Morgan Generation Offshore Wind Projects were screened in, the Information to Support Appropriate Assessment (ISAA) would be exceptionally long with a large number of tables presenting very small mortality numbers.</p>		

	<p>In the approach adopted for PEIR, the Applicant is looking to develop a proportionate HRA, responding to well known and acknowledged criticisms of the HRA process and making the assessment more accessible for stakeholders.</p> <p>As flagged by the offshore ornithology EWG, in terms of an audit trail, the apportioning numbers that have been used to screen out SPAs are set out in the HRA Stage 1 screening document. As such future projects can undertake a full in-combination assessment that includes mortality estimates from the Mona and Morgan Generation Offshore Wind Projects.</p> <p>We have had feedback from stakeholders in the offshore ornithology EWG that this approach to LSE screening is not what has been applied to other wind farms historically.</p> <p>The Applicant is therefore suggesting a compromise solution, noting that the approach for PEIR will be as previously set out. For the HRA Stage 1 screening and ISAA to be submitted with the application for consent, the Applicant will look to take a more traditional approach to the HRA Stage 1 screening while trying to control the level of detail in the ISAA. We would look to screen on the basis of the foraging ranges (as is typically undertaken for UK offshore wind farms). We would also look to screen SPAs and qualifying features out, where it can be demonstrated that there will be 0 mortalities (i.e. through CRM, displacement or apportioning e.g. fulmer and Manx shearwater and collision risk modelling. See slides).</p> <p>The Applicant is proposing to undertake a “two step” integrity test. The first step would be to undertake a high level initial assessment within the ISAA, using the apportioning paper to present where there is no risk of adverse effects on integrity on an SPA and not including a detailed assessment against the conservation objectives for each low risk SPA (e.g. using a brief, tabulated approach to concluding no adverse effects on integrity). The Mona and Morgan Generation Offshore Wind Projects have been suitably located; seabirds numbers across the sites area generally low therefore we expect a good number of SPAs to fall into this low risk category, that is, most if not all of the SPAs and features which were screened out at LSE in the PEIR.</p> <p>In the second step, a more detailed assessment would then be undertaken on the SPAs where there is a greater risk of adverse effects on integrity (likely to be limited to in-combination effects).</p> <p>Requested Feedback:</p> <ul style="list-style-type: none"> <li>• Please can the Steering Group provide feedback to these meeting minutes to indicate if a compromised solution (outlined above) would be acceptable in principle – this would allow us to work on restructuring the LSE Screening and ISAA.</li> <li>• While reviewing the PEIR could stakeholders provide feedback on which SPAs would be worth taking forward to the detailed assessment within the ISAA (i.e. second step integrity test).</li> </ul> <p>HT- The conservation objectives of each site need to be considered for each SPA taken forward to assessment. The Planning Inspectorate will</p>	<p><b>Steering group to provide feedback on whether a compromised solution to the ISAA assessment would be acceptable in principle.</b></p> <p><b>While reviewing the PEIR</b></p>	<p>Complete</p>
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<p>The site selection processes started with a constraints analysis to identify 'show stopper' constraints and refinement of constraints mapping through RAG analysis and workshops.</p> <p>The Mona Offshore Cable Corridor is subject to a number of hard constraints which translated into a number of unviable options. Key technical constraints included having a 1.5km wide cable corridor, although this increases as it enters then Mona Array Area to allow for flexibility of where the offshore export cables enter the Mona Array Area. The Applicant is looking to refine this area to ensure the application for consent covers as small an area of seabed as possible. The Applicant has sought to reduce the number of cable crossings and total length of the Mona Offshore Cable Corridor. The landfall considerations included technical feasibility of landfall locations and onshore routing options.</p> <p>The Applicant has also taken into account any publicly available information from feedback on the Awel Y Mor site selection process as the Mona Offshore Wind Project has a very similar point of interconnection.</p> <p>A landfall search area was established between Llandulas and Prestatyn on North Wales coast. The primary landfall locations assessed were Llandulas, Llandulas east, Belgrano and Rhyl. The intertidal area at Belgrano required crossing the Gwynt y Mor offshore wind farm cables in the nearshore environment. There is limited space in that area therefore this option was not considered viable. The Rhyl landfall was discounted as this landfall was selected for the Awel y Mor offshore export cable landfall. The Applicant looked at whether the same landfall could be used but it there is not enough space for both sets of cables.</p> <p>The Llandulas east landfall interacts with the Pensarn SSSI and other significant construction works in the area, which meant that there also is not enough space for additional cables in this location.</p> <p>The Llandulas landfall avoids putting cables though the SSSI and the Applicant is also looking to avoid the <i>Sabellaria alveolata</i> reef in the intertidal area at this landfall. The export cable will go under the hard constraints that run along the whole section of that coastline e.g. the road, railway and the historical landfill site.</p> <p>Further detail on the assessment for each landfall option has been provided in the PEIR site selection chapter.</p> <p><u>Mona Offshore Cable Corridor</u></p> <p>This area of the Irish Sea is very constrained with significant constraints in the offshore environment including environmental designations and other sea users.</p> <p>The Applicant identified four potentially viable routes between the Mona Array Area and the Bodelwyddan National Grid Substation. The potential routes either went through the gap between the two halves of the Gwynt y Mor array area or to the west of the Gwynt y Mor array area. Any options to the east of Gwynt y Mor were discounted during review due to significant technical constraints associated with</p>		
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	<p>anchorage area, export cables crossings, other wind farm infrastructure and designated sites. The routes through the centre of the Gwynt y Mor array area were discounted due to the pipeline already in that location taking up all available space. The route to the west of the Gwynt y Mor array area was taken forward for further development.</p> <p>The Mona Offshore Cable Corridor crosses the shipping lanes between Anglesey and Liverpool perpendicularly. It crosses the Awel y Mor Agreement for Lease area but is outside of the area for which they have applied for development consent. It passes through the Liverpool SPA (unavoidable), Constable Bank at the western end and through the corner of Menai Strait and Conwy Bay SAC. It avoids the mapped features of Menai Strait and Conwy Bay SAC (e.g. reefs) and it avoids the Lavan Sands / Conway Bay SPA and the North Anglesey Marine SAC.</p> <p>In relation to Constable Bank and the Menai Strait and Conwy Bay SAC, the specific location of the Mona Offshore Cable Corridor was chosen as if it moved further east then it encroaches further on the main body of Constable Bank and if it moves further west then it encroaches on the mapped features of the SAC.</p> <p>HT- What is Constable Bank?</p> <p>KL- A large sandbank which qualifies as an Annex I habitat. The sandbank is outside of an SAC so it is not a HRA consideration but the Applicant has had feedback from NRW that efforts should be made to reduce the impact on this feature.</p> <p>LR- It would be useful to have the four options laid out in the PEIR site selection chapter and presentation of the constraints associated with each.</p> <p>LH- Yes this will be laid out within the PEIR site selection chapter. If you have any feedback on the site selection chapter please let us know so we can build on it for the Environmental Statement.</p>		
<p>6.</p>	<p><b><u>Engineering considerations Constable Bank and the Menai Strait and Conwy Bay SAC (presented by KL and IK)</u></b></p> <p>KL presented an overview of PEIR assumptions. While the Mona Offshore Cable Corridor does overlap the Menai Strait and Conwy Bay SAC it doesn't overlap with areas of historically mapped reef features. This will be confirmed through the site-specific surveys carried out in summer 2022. The current indication is that the Mona Offshore Cable Corridor does not overlap with any reef habitats but full analysis of geophysical and benthic ecology (seabed imagery and grab sampling) is still being undertaken.</p> <p>For the purpose of the PEIR we have assumed that up to 14km of the cable corridor will be installed within the SAC. This 14km is made up of 4 cables, each 3.5km long (which is likely to be precautionary). We have assumed that all cables could require sandwave clearance and that up to 20% would require cable protection. The same assumptions for cable protection and sandwave clearance have been made for the cables going through Constable Bank. This is the maximum design</p>		

	<p>scenario and is a conservative estimate as site specific survey data were not available during PEIR drafting. However, this will be refined using site-specific survey data for the Environmental Statement.</p> <p>IK presented slides on cable installation methodologies included in PEIR. When the Applicant has the site-specific data, we will select the most appropriate cable burial methodology. The Applicant is looking to bury the cable wherever possible and only use cable protection where burial and remedial burial has not been successful. The preference is to use cable ploughs which have a smaller impact on the seabed compared to other technologies. Pre-lay plough may also be used, which is a form of ploughing with a larger seabed impact. Both will be considered and their use will depend on ground conditions. The PEIR also considered jet trenching and mechanical ploughing for harder ground conditions. Area of seabed close to the shore and close to Constable Bank are not expected to require large amounts of cable protection, but we are investigating this via site specific survey data. Even if we are not able to achieve burial with the plough, then jet trenching would be used before cable protection.</p> <p>KL noted that no cable crossings are required in the SAC or Constable Bank so there is no required cable protection associated with asset crossings.</p> <p>The PEIR considers sandwave clearance. The Applicant would prefer to use cable burial equipment to achieve cable burial rather than requiring sandwave clearance. Pre-lay plough may be used in Constable Bank, the trenches are generally very small, likely up to 3m at the top and 0.5m at the bottom. Further refinement to burial methods and the requirement for sandwave clearance will be done once the 2022 survey data has been analysed. Once the 2022 survey data has been analysed, the Applicant will undertake a cable burial risk assessment to determine the depth of burial required and look at the risks to the export cable for external activities and other sea users. There are new trenchers coming on to the market that allow trenching in harder ground conditions (which may be more relevant for offshore areas of the Mona Offshore Cable Corridor). The Applicant will select contractors for cable burial in order to meet the requirements of the ground conditions. The Applicant is looking to avoid using cable protection where possible.</p> <p>JI- If the project can minimise cable protection that would be NRWs preference. We appreciate the effort the project is putting into reducing the cable protection proposed.</p> <p>JI- When is the PEIR going to be submitted?</p> <p>LH-The PEIR for both Mona and Morgan Gen is being submitted end of March/ April so it will likely be with stakeholders in April. Consultation will run through April and May.</p>		
7.	<b>Close of meeting.</b>		

## **A.7. Steering group meeting 5**

### **A.7.1 Meeting minutes**

# MINUTES OF MEETING



Security Classification: Project External

Partners in UK offshore wind

**MOM Number** : 20230629\_Morgan and Mona SG **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group meeting 5

## MINUTES OF MEETING

**MEETING DATE** : 29/06/2023

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : ██████████ (RPS)

**ISSUED BY** : ██████████ (RPS)

### PERSONS PRESENT:

- ██████████ – bp (GV)
- ██████████ – bp (SR)
- ██████████ – bp (PC)
- ██████████ – RPS (KL)
- ██████████ – RPS (ST)
- ██████████ – JNCC (JW)
- ██████████ – MMO (AP)
- ██████████ – Natural England (EW)
- ██████████ – Natural England (KB)
- ██████████ – Planning Inspectorate (EP)
- ██████████ – NRW (LR)
- ██████████ – NRW (RN)

### APOLOGIES:

ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
	<p><b><u>Project updates (presented by GV)</u></b></p> <p>Statutory consultation on the Mona and Morgan Generation PEIRs ended on 4<sup>th</sup> June. The Applicant appreciates all the feedback; we are currently reviewing all the responses and how they can be addressed. From the statutory consultation feedback and parallel activities, the Applicant has been considering a number of project updates. There are several updates to the project description envelope that are expected to be included in the application.</p> <p>The Applicant is looking to reduce the Mona Array Area and the Morgan Generation Array Area. They are expected to be reduced from what was presented in PEIR and lie wholly within the array areas presented in the PEIR. The Mona Array Area is anticipated to be reduced by approximately 33% and lie wholly within Welsh offshore waters. The Morgan Array Area is anticipated to be reduced by approximately 10%. The primary driver for these</p>		

	<p>reductions is shipping and navigation, specifically ensure safety of navigation. The need for changes for the project design envelope has been highlighted through engagement with a number of the ferry companies in the Irish Sea. The reductions have also been driven through consultation with aviation and other sea users receptors.</p> <p>The layout principles for both Mona and Morgan Generation are expected to be updated to increase the spacing requirements between offshore structures, the specific updates will be communicated in due course. These updates are to address concerns from commercial fisheries.</p> <p>The Applicant is anticipating that monopile foundations will be removed from the project design envelope. The foundations options remaining will be gravity base or jackets (which may be pin piled or suction bucket foundations). This is being driven by the ground conditions. The Applicant expect there to be a mixed foundation solution taken forward to the application, likely to be a mix of jacket and gravity base foundations.</p> <p>The smallest wind turbine option is being removed from the project design envelope due to feedback from the supply chain that this turbine option won't be available at the time of construction. The rotor diameter will therefore also increase from 280m to 320m and this is also based on feedback from the supply chain on the parameters for the wind turbines that will be available at the time of construction.</p> <p><i>Post meeting note: The rotor diameter will increase from 280m to 320m not 340m. The slide deck has been updated (attached) accordingly.</i></p> <p>The Applicant is also reviewing the parameters for the design envelope following the statutory consultation responses. Any updated parameters will be fully explained and justified within the application.</p> <p>EP- Is the Mona offshore cable corridor also wholly within Welsh waters.</p> <p>GV- Yes, the Mona Array Area is entirely within Welsh offshore waters and the Mona Offshore Cable Corridor is within Welsh offshore and inshore waters.</p>		
	<p><b><u>LSE screening and ISAA approach (presented by KL)</u></b></p> <p>This slide is a repeat of what has been presented in previous EWGs. It summarises the updated approach to the HRA screening and ISAA that was sent to the steering group and offshore ornithology EWG in May 2023. The applicant is looking for feedback on if this approach is acceptable for the application.</p> <p>LR- NRW agree with the updated HRA methodology for the project alone assessment. We would like it acknowledged that this methodology has been agreed for the Mona and Morgan Generation assets project only and advice may differ for other</p>		

	<p>offshore wind farm projects. The methodology set out in the note sent to the EWG does not address impacts to non-breeding birds. NRW disagree that this updated HRA methodology is appropriate for the in-combination assessment. Sites with less than 1% baseline mortality should still be considered for the in-combination assessment. Step 1 of the integrity test relies on the magnitude of impact. This does not take into account conservation objectives that aren't linked to the magnitude of impact e.g. distribution of features. For these features this approach may not be suitable.</p> <p>KL- Thank you for providing initial comments, we can discuss the detail with the Offshore Ornithology EWG.</p> <p>KB- Natural England have similar comments to NRW, as the projects have high connectivity and low magnitude of effect you would end up screening in a lot of sites with a very small impact so we are broadly contact with the updated approach. There are two concerns which are regarding the screening of non breeding birds and screening out sites with less than 1% mortality for in-combination effects.</p> <p>KL- Could you provide you high level comments in writing today so we can discuss them with the ornithologists ahead of the offshore ornithology EWG?</p> <p>JW- JNCC are also aligned with NRW and Natural England's comments.</p> <p>EP- Can Natural England, JNCC and NRW include the Planning Inspectorate when providing their feedback on the updated HRA methodology.</p> <p>KB/LR/JW- Yes this should be fine.</p> <p><i>Post meeting note- Initial feedback from Natural England, JNCC and NRW included as an appendix to these minutes.</i></p>	<p><b>NE, NRW and JNCC to provide written feedback on HRA approach following close of the meeting.</b></p>	<p>29/06/2023 (completed, see below)</p>
	<p><b><u>Section 42 responses (presented by KL)</u></b></p> <p>The Applicant and RPS have been working through all the S42 responses, looking to the project design envelope and the environmental assessment. There were a couple of key responses that we wanted to raise to the steering group; these will also be discussed with the EWGs.</p> <p>There was several requests for the project to undertake assessments for historic projects where quantitative information required to include them in the cumulative and in-combination assessments is not available. The cumulative and in-combination assessment can only be undertaken on publicly available data and it may not be appropriate to undertake analysis for other projects. There is also no precedent for that type of analysis. Noted that Natural England had a suggested approach they would like to discuss in the Ornithology EWG – for discussion at next EWG.</p> <p>The IoM offshore windfarm is in the early stage of the planning process and we expect the scoping report to be published in the autumn. We will incorporate the information in the public domain</p>		



<p>into the cumulative and in-combination assessment for Mona and Morgan Generation, in line with the Tiered approach.</p> <p>There were a few comments on the site specific data available to be included in the PEIR. The benthic data for the Mona Offshore Cable Corridor and the zone of influence for the Mona and Morgan Array Areas will be presented in the July EWG. For marine mammals and offshore ornithology, the 24 months of survey data for Morgan Generation will be presented and discussed in the October EWG meetings for those topics.</p> <p>Natural England provided comments on the Morgan Generation and the Morgan and Morecambe Offshore Wind Farms: Transmission Assets (Transmission Assets) applications to ensure that a whole project assessment is undertaken.</p> <p>Are there specific topics or receptors that are of particular concern for the cumulative assessment for Morgan Generation and the Transmission Assets together? The Applicant is considering how human topic cumulative impacts are addressed and we have strategies for those impacts.</p> <p>KB- Mobile species e.g. Offshore ornithology and marine mammals would be the key receptors of concern.</p> <p>KL- For Morgan Generation, we will be undertaking a whole project assessment within the cumulative effects assessment (CEA). The Transmission Assets will be included within the CEA as a separate section so it clearly presents the impact of the Morgan Offshore Wind Project as a whole project.</p> <p>We can only base the CEA on information in the public domain. These projects are subject to separate consent applications so there will always be difficulty regarding what information is available at the time of application. However, that is why the tiered approach to CEA was developed and adopted and we feel the approach set out in the slides adequately addresses the concerns raised.</p> <p>We will circulate the slides after the meeting so you can review the approach to CEA in full. Please can the stakeholders provide their feedback in writing with the meeting minutes.</p> <p>SR- Does this provide reassurance that the project is being considered as a whole?</p> <p>KB- How it is set out is clear but we will need to review in more detail before providing any feedback.</p> <p>EP- The Planning Inspectorate will consider the proposed approach and provide any comments in writing. How will changes between PEIR and the application be considered?</p> <p>SR- The majority of changes made as projects move from PEIR to application are to refine parameters so impacts are likely to reduce. Therefore basing the CEA on a project PEIR may be a more conservative approach.</p>	<p><b>Stakeholders to provide their feedback on the approach to the CEA for Morgan Generation</b></p>	<p>Complete</p>
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	<p>KL- This a challenge across offshore wind projects. Incorporating changes from PEIR to application for CEA projects is challenging as they are separate consent applications and we have to use information in the public domain.</p> <p>LR- Are there any further indications of what the timescales for these projects are.</p> <p>KL- The Transmission Assets is expecting to publish its PEIR in autumn 2023, Mona and Morgan Generation are expected to apply for consent in Q1 2024.</p> <p>LR- Do you know what the lag between Mona and Morgan Generation will be?</p> <p>GV- We don't know what the lag between the two projects will at this point, they are both scheduled for Q1 2024.</p> <p>SR- The Transmission Assets application for consent is likely to be Q3 2024.</p>		
	<p><b><u>Agreement logs (presented by KL)</u></b></p> <p>The latest agreement logs were circulated in May and it would be useful if stakeholders could review their positions within those agreement logs and update them now the PEIR has been reviewed. Parallel to that the Applicant and RPS are working through the statutory consultation responses and looking at where we consider agreement has been reached. If stakeholders can provide feedback on agreement logs to date following the EWGs, we will circulate the meeting minutes two weeks after the meeting but the agreement logs may be a week or so behind that to incorporate the statutory consultation feedback.</p> <p>JW- To clarify, you are asking stakeholders to take the most recent agreement logs and update them with the information to date.</p> <p>KL- Yes. In the current agreement logs there are a lot of agreements with caveats for when the detail could be read in the PEIR. Can these historic comments be updated based on review of the PEIR to provide an updated position on the previous agreements.</p>	<p><b>Stakeholders to provide updated EWG agreement logs to reflect the information provided in the PEIR.</b></p>	<p>Complete</p>
	<p><b><u>Next Steps (presented by KL)</u></b></p> <p>KL noted that meeting minutes are to be circulated 2 weeks following the meeting, with agreement logs circulated after the meeting minutes.</p> <p>Next Steering Group meeting planned for October 2023.</p> <p><b><u>Any other Business</u></b></p> <p>KB noted that there may not be an ornithology specialist from Natural England at the Offshore Ornithology EWG on 30 June. As such, feedback will be provided in writing.</p>		

	SR queried whether other ornithology specialists would be attending from other SNCB organisations. JW and LR confirmed this would be the case.		
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Appendix – Initial feedback on the updated HRA methodology

## **A.7.2 Response from Natural England regarding the meeting minutes**

Date: 27 July 2023  
Our ref: DAS/UDS A009203 442336  
Your ref: Morgan and Mona Steering Group 05 29th June 2023



[REDACTED]  
RPS/ Energy  
Goldvale House  
27-41 Church Street West  
Woking  
Surrey  
GU21 6DH

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

0300 060 3900

cc [REDACTED]  
RPS

## BY EMAIL ONLY

Dear [REDACTED]

**Discretionary Advice Service (Charged Advice): UDS A009203**  
**Development proposal:** Morgan Generation and Mona Offshore Windfarm  
**Consultation:** Morgan and Mona Steering Group 05

This advice is being provided as part of Natural England's Discretionary Advice Service (DAS) in accordance with the Quotation and Agreement dated 23<sup>rd</sup> May 2023 to Morgan Offshore Wind Limited & Mona Offshore Wind Limited.

The following advice forms Natural England's response to the meeting minutes provided for the Morgan and Mona Steering Group 05 attended by Natural England on 29<sup>th</sup> June 2023.

Natural England were asked to provide feedback on the following points:

- The approach to the CEA for Morgan Generation

## Detailed comments

### Cumulative and in-combination assessments

Natural England understands the approach being taken for the CEA for Morgan Generation. However, we retain concerns associated with stranded assets during the consenting process (ref: 435658/436243). In particular, if there are significant changes to the Transmission Assets following the PEIR consultation, there is a concern that these won't have been considered in the Morgan and Mona Generation Assets CEA at the time of Application.

Natural England have secured funding for a project to quantify displacement and collision impacts from all relevant extant offshore wind farms using contemporary assessment methods projects. We anticipate the project can prioritise the assessment of Irish Sea projects to facilitate a more comprehensive cumulative and in-combination assessment of relevant Round 4 and Round 5 projects.

Natural England will keep the Applicant up to date as far as possible in terms of timelines and outputs from this work, and their potential application for the assessments of the Morgan and Mona OWFs. Given the accelerated timelines for submission, this project may not deliver data to enable gap-filling of relevant impacts in time for the cumulative effects assessment. Thus, Natural England would welcome further discussion and consideration of this issue through the EWG. A qualitative assessment/consideration of unknown impacts may be an appropriate compromise.

For clarification of any points in this letter, please contact me using the details provided below.

Yours sincerely,

[REDACTED]  
Marine and Coastal Lead Adviser  
Coast and Marine Team  
Cheshire to Lancashire Area Team  
[REDACTED]

The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Cc [commercialservices@naturalengland.org.uk](mailto:commercialservices@naturalengland.org.uk)

## **Annex 1**

### **European Protected Species**

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's ['How to get a licence'](#) publication.

If the application requires planning permission, it is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [guidance](#) on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant planning permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help developers and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after planning permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on [Natural England's website](#).

## **A.7.3 Morgan and Mona updated HRA Methodology Note**



# MORGAN GENERATION AND MONA OFFSHORE WIND PROJECTS

HRA Methodology Update



05 May 2023  
F01

Image of an offshore wind farm

**Document status**

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Issue to stakeholders	RPS	bpEnBW	bpEnBW	05/05/2023

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The report has been prepared using the information provided to RPS by its client, or others on behalf of its client. To the fullest extent permitted by law, RPS shall not be liable for any loss or damage suffered by the client arising from fraud, misrepresentation, withholding of information material relevant to the report or required by RPS, or other default relating to such information, whether on the client's part or that of the other information sources, unless such fraud, misrepresentation, withholding or such other default is evident to RPS without further enquiry. It is expressly stated that no independent verification of any documents or information supplied by the client or others on behalf of the client has been made. The report shall be used for general information only.

<b>Prepared by:</b>	<b>Prepared for:</b>
<b>RPS</b>	<b>Morgan and Mona Offshore Wind Ltd.</b>

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**Acronyms**

Acronym	Description
AEOI	Adverse Effect on Integrity
HRA	Habitats Regulations Assessment
ISAA	Information to support and Appropriate Assessment
LSE	Likely Significant Effect
PEIR	Preliminary Environmental Impact Assessment
SPA	Special Protection Area

**Units**

Unit	Description
%	Percentage

# 1 HRA METHODOLOGY UPDATE

## 1.1 Introduction

1.1.1.1 The benefits of a proportionate Habitats Regulations Assessment (HRA) for all parties are well understood. The approach undertaken for ornithology Stage 1 HRA Screening in the Preliminary Environmental Information Report (PEIR), set out the Applicant's aim to develop a proportionate Habitats Regulations Assessment (HRA), in response to the well-known and acknowledged criticisms of the HRA process whilst making the assessment more accessible for stakeholders. However, the feedback from stakeholders in the offshore ornithology Expert Working Group (EWG) was that this methodology is not what has been applied to other wind farms historically. The Applicant is therefore proposing a compromise solution for the Stage 1 HRA Screening and Stage 2 (Information to Support Appropriate Assessment (ISAA)) to be submitted with the application for development consent.

1.1.1.2 This technical note provides a summary of the proposed ornithology HRA methodology for both the Mona and Morgan Generation Offshore Wind Projects. The purpose of this note is to outline the process that will be undertaken within the HRA Stage 1 Screening and the Stage 2 ISAA and seek approval for this method with the Evidence Plan Steering Group prior to drafting the HRA to be submitted with the application for consent. This note is for the offshore ornithology EWG members to consider and to also use to update the offshore ornithology EWG agreement logs as appropriate, while reviewing this technical note alongside the PEIR for the Morgan Generation and Mona Offshore Wind Projects.

1.1.1.3 It should be noted that this technical note does not list the sites considered, a full list of European sites will be presented separately in the fully updated Stage 1 HRA Screening reports for the Morgan and Mona Offshore Wind Projects.

## 1.2 Stage 1 HRA Screening

1.2.1.1 For the Stage 1 HRA Screening, the Applicant will look to take a more traditional approach whilst aiming to manage the level of detail included in the Stage 2 ISAA. The Applicant will undertake a preliminary screening based on the foraging ranges from Special Protection Areas (SPAs) with breeding colonies (as is typically undertaken for UK offshore wind farms), with an LSE Screening matrix presented for each SPA within the relevant foraging range. However, in order to ensure a proportionate Stage 2 ISAA which focusses on the key SPAs and associated features of importance; where it can be demonstrated that there will be zero mortalities (i.e. zero mortalities will be considered as 0.0, a 0.2 figure will not be rounded down to 0) of breeding birds (i.e. through collision risk modelling and/or displacement assessments and subsequent apportioning to individual SPAs) the associated qualifying feature will be screened out of further assessment.

1.2.1.2 All sites and features where mortalities associated with collision or displacement are predicted to be more than zero (>0) will be screened in for further assessment in the ISAA. The evidence to support these conclusions (i.e. numbers of bird mortalities apportioned to individual SPAs) will be set out in the individual LSE Screening matrices (as per the approach in PEIR).

## 1.3 Stage 2 ISAA

1.3.1.1 For the HRA Stage 2 ISAA, the Applicant is proposing to undertake a 'two step' integrity test as discussed with the Evidence Plan Steering Group and the offshore ornithology EWG. This will involve a high level initial step 1 assessment to determine those SPAs with low risk (further information on 'step 1 for 'low risk' SPAs is provided below in paragraph 1.3.2.1) of Adverse Effect on Integrity (AEOI), and a more detailed step 2 assessment for those SPAs where there is greater risk of an AEOI.

### 1.3.2 Integrity test: step 1

1.3.2.1 Step 1 will involve a high level initial assessment using the apportioning assessment to present where there is low risk of AEOI of an SPA. If the predicted magnitude for the project alone is <1% of the baseline mortality of the reference population for a qualifying feature, then a high level assessment will be presented and a conclusion of no AEOI can be made. For those deemed 'low risk' SPAs, a high-level assessment will be provided against the conservation objectives (e.g. a brief, tabulated approach to concluding no AEOI). As discussed with the EWG (to be agreed via this note), this level of detail is deemed sufficient if the predicted magnitude is <1% of the baseline mortality of the reference population. In these cases, it will be concluded that the predicted magnitude will not affect the achievement of the conservation objectives for the SPA and as a result will not have an adverse effect on the integrity of the SPA.

1.3.2.2 Based on information presented within the PEIRs, impacts from the Mona and Morgan Generation Offshore Wind Projects on SPAs and associated ornithological features from displacement and collision are generally low and therefore the Applicant is anticipating that a large number of SPAs will fall into this low risk category, that is, most if not all of the SPAs and features which were screened out at the Stage 1 HRA Screening Stage in the PEIRs.

1.3.2.3 If the predicted magnitude is >1% of the baseline mortality of the reference population for a qualifying feature, then further consideration will be given to the magnitude of the likely effect, including the contribution of impacts from other plans and projects, in-combination. In this case an AEOI cannot be ruled out and the SPA and associated qualifying features will be progressed to the Integrity test: step 2, outlined in paragraph 1.3.3.1 below. This approach broadly follows the same approach as that followed for other DCO applications (e.g. Hornsea Four), although as set out above, the Applicant would look to streamline this process (e.g. by tabulating information for ease of review).

### 1.3.3 Integrity test: step 2

1.3.3.1 In the second step, a more detailed assessment will be undertaken on the SPAs where there is a greater risk of AEOI (likely to be focussed on in-combination effects). As outlined above in paragraph 1.3.2.3 these will be for European sites where the predicted magnitude is >1% of the baseline mortality of the SPA reference population for a qualifying feature. Step 2 will then follow a similar process to that undertaken to the Stage 2 ISAA submitted with the PEIR, and will use further detailed information from collision risk modelling assessments, displacement assessments and Population Viability Analysis (where required for particular species/sites) to examine against each conservation objective for the relevant SPAs in order to make a conclusion with regard to adverse effects on integrity.

## **A.8. Steering group meeting 6**

### **A.8.1 Meeting minutes**

# MINUTES OF MEETING



Security Classification: Project External

Partners in UK offshore wind

**MOM Number** : 20231017\_Morgan and Mona SG **REV. No.** : F02

**MOM Subject** : Morgan and Mona Evidence Plan Steering Group meeting 6

## MINUTES OF MEETING

**MEETING DATE** : 17/10/2023

**MEETING LOCATION** : Microsoft Teams

**RECORDED BY** : ██████████ (RPS)

**ISSUED BY** : ██████████ (RPS)

### PERSONS PRESENT:

- ██████████ – bp (MP)
- ██████████ – bp (████)
- ██████████ – bp (████)
- ██████████ – RPS (████)
- ██████████ – RPS (████)
- ██████████ – JNCC (████)
- ██████████ – MMO (████)
- ██████████ – MMO (████)
- ██████████ – Natural England (████)
- ██████████ – Natural England (████)
- ██████████ – Planning Inspectorate (████)
- ██████████ – NRW (████)


ITEM NO:	DISCUSSION ITEM:	Responsible party	Date
1	<p><b><u>Project updates (presented by MP)</u></b></p> <p>Following responses to the Mona and Morgan Generation Preliminary Environmental Information Report (PEIR), the project design envelope has been reviewed and updated. The Mona and Morgan array areas have been reduced in size, mainly in response to shipping and navigation and commercial fisheries consultation. The slide (slide 5) provides links to the offshore newsletters for Mona and Morgan Generation that were published in September 2023 and present key offshore updates.</p> <p>The minimum spacing between offshore infrastructure has been increased to 1,400 m both within and between rows. The maximum number of wind turbines has been reduced from 107 to 96 for both Mona and Morgan Generation. The rotor diameter of the largest wind turbine has increased from 280 m to 320 m for both Mona and Morgan Generation. Monopiles have been removed from the list of foundation options included in the project design envelopes. Gravity base foundations and jackets on suction buckets or pin piles (drilled or driven) are retained.</p>		

	<p>No cable protection higher than 70 cm will be installed within in the Menai Strait and Conwy Bay SAC. The percentage of export cable requiring cable protection has been reduced to not exceed 10% of the total length within the SAC. Additionally, no more than a 5% reduction in water depth will occur at any point along the export cables without prior written approval from the Licensing Authority in consultation with the MCA.</p> <p>In addition, we can confirm that the Mona export cables will be installed under the intertidal area from below MLWS to above MHWS onshore via trenchless techniques. Open-cut trenching within the intertidal area has been removed for the project design envelope. This will remove any direct impact to the clay and piddock habitat in the intertidal area. The project has also made a significant reduction to the volume of seabed preparation material in the Mona and Morgan Generation Array Areas and the Mona Offshore Cable Corridor.</p> <p>EP- Do you know if the applications will be submitted towards the beginning or the end of Q1 and Q2 2024?</p> <p>PC- Ideally in the middle of those time frames, middle of Q1 for Mona but we cannot commit to timeframes at the moment.</p> <p>EP- And for Morgan?</p> <p>SR- Morgan will be submitted within Q2 2024, hopefully fairly close to Mona.</p>		
2	<p><b><u>Approach to LSE screening (Presented by KL)</u></b></p> <p>The approach on breeding birds has been agreed, where the apportioning shows 0 birds impacted from a SPA, we will screen those birds out within the Stage 1 screening report, otherwise they will be taken forward to the Information to Support Appropriate Assessment (ISAA).</p> <p>This methodology does not apply to SPA where the conservation objectives are not related to populations that are affected by displacement or collision. The approach to these SPAs (e.g. Liverpool Bay SPA) has not been updated, this will be clarified in the updated HRA methodology note.</p> <p>The approach the projects are adopting for birds during the non-breeding season is based on feedback from Natural England and NRW. The approach is based on the Morecambe PEIR and we are also aware that this approach has been used for the Berwick Bank Offshore Windfarm. The approach starts with the BDMPS areas, and SPAs within foraging ranges of breeding colonies of the BDMPS populations. Where the non-breeding bird population of an SPA contributes less than 1% of the BPMPS population, LSE will be screened out. Where the non-breeding bird population of an SPA contributes 1% or more of the BPMPS population, the SPA will be taken through to the ISAA. This approach means that the key</p>	<p><b>The Applicant to issue the final updated HRA methodology note</b></p>	<p>Complete</p>

	<p>SPAs that contribute the regional population are included in the assessment.</p> <p>Following the HRA Stage 1 Screening, we have the Step 1 and Step 2 AEIO test to the ISSA. So for Step 1 we'll do a 'high level' assessment of AEIO. This High level assessment is likely to be tabulated.</p> <p>The ISAA Step 1 is likely to include a table for the project alone assessment which will be &lt;1% for all species with a clear conclusion of no AEIO.</p> <p>Step 1 will include another table for each feature/species, with the project alone number and the other plans/projects considered cumulatively. This will have more accompanying text because of the uncertainties associated with some of the older projects.</p> <p>The project has received advice from Natural England on how older offshore wind projects should be included in the cumulative and in-combination assessments. We will include Morgan Generation and Morecambe Generation in Mona's cumulative/in-combination assessment as these assessments have been undertaken recently following the best practice advice and they have recent assessments in the public domain. The area of complexity comes from the older projects which may not have done full apportioning, baseline data is not available (e.g. the very old ones) etc. Natural England advised in a previous EWG that a Natural England project was being commissioned to help provide these answers; but unfortunately that project will not be available in time to inform the Applications.</p> <p>For the other projects, we are looking into how we can include a quantitative assessment but there is likely to be some qualitative text and caveats. We may present collisions risk numbers in the tables but if they are not apportioned in the original cumulative projects assessment then would need to flag in the table that there are uncertainties associated with these numbers (e.g. they may be over-conservative).</p> <p>It may also not be appropriate to quantify effects of some historic projects, especially where they are very old. For projects that are already part of the baseline e.g. for a project that is 15 years old and pre-dates the designation of an SPA and the SPA population counts. The current baseline mortality against which impacts are measured would therefore already include the mortality from these older projects as they are ongoing impacts.</p> <p>We are looking at the advice from Natural England; our ornithology specialists are considering the advice. We will need to get back to the EWG on what we can do on this and our approach for the final applications. However, it is the project's intention to consider these historic projects in the CEA where possible to ensure there are no gaps in the CEA, but context is important to ensure we're not overestimating impacts. Further, it might not be appropriate to assess quantitatively for projects without the</p>	<p><b>The Applicant to consider how to include a quantitative assessment for older offshore wind projects in the CEA (but there is likely to be some qualitative text and caveats)</b></p>	<p>Ongoing</p>
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<p>modelling being originally presented in the ES/HRA for these projects.</p> <p>KL-The Applicant would not want to redo assessment for other projects where the information was not originally presented in the ES/HRA.</p> <p>EP: Is there a cut of date between projects that are part of the baseline and what is included in the cumulative assessment?</p> <p>KL- That is good question and not one we have an answer to at the moment. It is something that we will be considering alongside the Natural England advice. We will pick this up with the ornithology EWG, potentially in a separate meeting when the Applicant has had time to consider the advice.</p> <p>SR: Some older projects don't have much information in their project description and EIA so to make an informed decision on impacts would be very difficult and almost impossible to undertake CRM for these projects.</p> <p>KL- The industry is definitely really interested in the Natural England project to determine the numbers for older projects. Unfortunately the dates will not allow us to include these in the applications, we wouldn't want to pre-empt these results.</p> <p>EP: Will the results of the Natural England project be ready for the examination?</p> <p>SR: That is what the projects were expecting but the email from Natural England yesterday suggested that that it will not be ready for examination and would be expected towards the end of 2024 or 2025.</p> <p>KL: We will follow up with the offshore ornithology EWG with the updated HRA methodology with the final updates to the methodology from stakeholder comments. We have agreed the methodologies with the EWG but we would like to get it in writing.</p> <p>SR: We have received legal advice on the structure of the ISAA which is very long due to the nature of the document and that we are now screening lots of additional sites and a lot of additional information. We are aware that it is important to keep all of the information together but we would like to split the ISAA up into three sections. These will take the form of three separate PDFs for each section but will be parts of the ISAA rather than separate documents. Would this approach be acceptable for the steering group?</p> <p>KL: Part 1 of the ISAA would provide an overview of the HRA in general, background information and methodologies. Part 2 would present the assessment on SACs and part 3 would present the assessment of SPAs. This structure would make it more accessible as ornithology would be in one section and specialists can go to the section they are most interested in. It will form one part of the application but this format will make producing it and reviewing it easier. In addition, it will make the report easier to download and</p>	<p><b>The Applicant to consider if a further EWG is required to discuss approach to the CEA</b></p>	<p>Complete</p>
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	<p>scroll through. The integrity matrices would form an appendix to these.</p> <p>EP: In principle, this format sounds helpful, a good idea and sensible. I will take this away and ask for feedback from the Planning Inspectorate lead advisor for the projects. <i>Post meeting note: As requested, the Inspectorate has provided advice on this matter which will be published as s51 advice on the Morgan and Mona project pages of the National Infrastructure Planning website.</i></p> <p>KL: We can provide a link to the Berwick Bank RIAA which followed this approach on its structure (see below).</p> <p>LR: This sounds reasonable and a link to the Berwick Bank RIAA would be helpful.</p> <p>AP: MMO has no comments on this.</p> <p>KB: We agree with this approach in principle but would like to see the Berwick Bank example.</p> <p><i>Post meeting note: The Berwick Bank RIAA can be found here:</i>  </p>	<p><b>Stakeholders to confirm that the Mona and Morgan Generations ISAAs can be split into parts.</b></p>	<p>Complete</p>
<p>33</p>	<p><b><u>Piling Strategy (presented by KL)</u></b></p> <p>Site Integrity Plans have historically been applied to projects in the Southern North Sea (SNS), in particular those within or close to the SNS SAC, which is designated for Harbour Porpoise. In these SIP's there are defined thresholds for cumulative effects of piling – 10% in a particular season, or 20% on a particular day. Mona and Morgan Generation are not predicted to reach the 10% area threshold for the nearest harbour porpoise SAC (i.e. North of Anglesey Marine SAC), either alone or in-combination with other projects. As such, a SIP, similar to those used in the Southern North Sea SAC, is not considered appropriate to manage underwater sound impacts.</p> <p>At PEIR, outstanding concerns were raised with respect to:</p> <ul style="list-style-type: none"> <li>• Bottlenose dolphin populations, including those associated with Welsh SACs;</li> <li>• Cumulative concerns about impacts of piling on cod spawning;</li> <li>• Concerns about piling impacts on herring spawning.</li> </ul> <p>The Applicant is looking to agree a mechanism (similar to SIPs) that allow us to agree an approach to managing of underwater sound impacts post consent, when more details of the project construction for the individual projects, and more detail on cumulative projects in the region is known. We are considering a Piling Strategy (name TBC) to do this.</p> <p>Also worth noting that underwater sound impacts (particularly in relation to cumulative impacts) were also flagged in the Awel y</p>		

	<p>Mor consent decision and the Awel y Mor applicant and NRW are still in discussions on the marine licence.</p> <p>The Piling strategy would allow the projects to focus on underwater sound for multiple receptors (fish and marine mammals). If this is acceptable for the steering group then we can put together an outline plan to be included with the application so the stakeholders and Secretary of State can have confidence that this will be effective and agreed post consent.</p> <p>The piling strategy would set out the detailed project design pre-construction (e.g. the number of foundations that will need piling may be reduced, hammer energies may be revised etc.) as the application collects more information on the ground conditions.</p> <p>It will contain more environmental information e.g. cod and herring stock or spawning grounds. These have previously been used post-consent in discussion on underwater sound impacts.</p> <p>The impact assessments within applications assume all the piling is occurring at the same time and therefore you end up with a large, conservative assessment. In reality, all cumulative projects may not be piling at the same time therefore the cumulative impacts will likely be reduced from what has been assumed in the final applications. This has been the experience for SIPs where impacts have been reduced due to phasing of projects.</p> <p>The Piling strategy will set out potential mitigation options which could be employed if there are residual concerns about the cumulative impacts of underwater noise following refined project design. These are often agreed in principle at the application stage with final agreement achieved post consent with the final project design.</p> <p>The main advice the applicant is looking for is whether this approach would be acceptable. We are trying to put forward a process where the projects can continue towards consent and the detail can be discussed post-consent when further information is available. If there is general agreement on this approach then we can discuss it in further detail with the EWGs. An example Piling Strategy was shown on slide 12 from a Scottish project, but these would be developed to be project specific and would include consideration of cumulative projects and timing of these.</p> <p>LR: NRW Advisory welcome the Piling strategy approach, the outline Table of Contents and the intention to consider noise abatement as an option for management and mitigation.. This would help address the concerns highlighted at PEIR.</p> <p>EP: In principle this sounds good, we would be looking to make sure it accounts for the worst case scenario and therefore, that any altering of the project design post any consent would only decrease impacts. For cumulative scenarios, there should be consideration of concurrent piling and cumulatively with UXO detonation as well.</p>	<p><b>Stakeholders to confirm whether the Piling strategy is an acceptable approach to manage underwater sound impacts</b></p>	<p>Complete</p>
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	<p>KL: The applications looking at different scenarios, both the temporal and spatial worst case scenario. There is a lot of precaution built into the assessment.</p> <p>EP: You mentioned about having a draft Piling Strategy. When would this be available?</p> <p>KL: We would need to look at the programme, we would definitely submit an outline during the examination but we would need to consider what is possible with the application. The Applicant would look to consult on the draft ahead of the examination.</p> <p>SR: It would definitely be a draft rather than an outline plan as the project wouldn't have the detail required at examination. The project parameters would not be refined down to the point of final design.</p> <p>EP: An Examining Authority is likely to be looking for evidence of consultation and agreement with the SNCBs on the content of the draft/ outline Piling Strategy.. <i>Post meeting note: As requested, the Inspectorate has provided further advice on the Piling Strategy approach, which will be published as s51 advice on the Morgan and Mona project pages of the National Infrastructure Planning website.</i></p> <p>KL: Yes the Applicant would also be looking for agreement with the SNCBs.</p> <p>SR: Does the MMO have any thoughts on this approach? It would be good to hear your thoughts as you have experience on SIPs in the North Sea.</p> <p>AP: Initially this looks like a good approach but I will take this away and discuss it with Cefas.</p> <p>KL: If you want to pass the slides and meeting minutes on to Cefas then we are happy for you to do that.</p> <p>JW: There are no objections from JNCC but I will take this away for the marine mammal specialists to consider.</p> <p>KB: Agree that we are happy with this in principle I will take this away for the marine mammal specialists to consider.</p>		
4	<p><b><u>Agreement logs (presented by KL)</u></b></p> <p>We have had a benthic EWG last week and an offshore ornithology EWG later this week and we will be re-circulating the agreement logs. There have been lots of recent written correspondence with the EWGs and there are items that the Applicant now thinks we can get agreement on. In addition, we want to map out the progress towards agreement on conclusions and mitigation. The Applicant is aware that there are issues that will be still under discussion for the final application as we anticipate that you will</p>		

	<p>want to see the detail included in the final application to support the conclusions (flagged in agreement logs a “under discussion”).</p> <p>The applicant is asking stakeholders if some items can now be agreed based on discussions since PEIR (flagged in agreement logs as “can this be agreed”. These are items for the project alone based on the PEIR and updates that the project has made since PEIR. The Applicant is not looking for agreement on everything but we are looking to close out as much as possible.</p> <p>If there are items that the specialists want to add or items that they want to split out in the agreement logs then please feed that back to us. The agreement logs will form a framework for the statements of common ground.</p>		
5	<p><b><u>Next steps</u></b></p> <p>The meeting minutes will be circulated two weeks following this meeting.</p>		

## **A.8.2 Response from Natural England regarding the meeting minutes**

Date: 14 November 2023  
Our ref: DAS/UDS A009203 456624  
Your ref: Morgan and Mona Steering Group 06 17th October 2023



[REDACTED]  
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RPS

**BY EMAIL ONLY**

Dear [REDACTED]

**Discretionary Advice Service (Charged Advice): UDS A009203**  
**Development proposal:** Morgan Generation and Mona Offshore Windfarm  
**Consultation:** Morgan and Mona Steering Group 06

This advice is being provided as part of Natural England's Discretionary Advice Service (DAS) in accordance with the Quotation and Agreement dated 23<sup>rd</sup> May 2023 to Morgan Offshore Wind Limited & Mona Offshore Wind Limited.

The following advice forms Natural England's response to the meeting minutes provided for the Morgan and Mona Steering Group 06 attended by Natural England on 17<sup>th</sup> October 2023.

Natural England were asked to provide feedback on the following points:

- Stakeholders to confirm that the Mona and Morgan Generation ISAAs can be split into parts
- Stakeholders to confirm whether the Piling strategy is an acceptable approach to manage underwater sound impacts

**Detailed comments**

**Splitting the ISAAs**

Splitting of the ISAAs may have happened in other OWF projects. It sounds like this decision ultimately lies with the Planning Inspectorate. From Natural England's perspective, if the reason for splitting it is due to the file size rather than changing the methodology of the assessment, we think this would be acceptable. We advise that it is as reader friendly as possible and clear which documents/figures are being referred to throughout. Ultimately, we'd be happy to go with the Planning Inspectorate's decision for this.

**Piling Strategy**

Natural England welcomes the Piling strategy approach as it addresses some of our concerns raised from the PEIR. It is hoped that it will produce more accurate assessments which will allow for more appropriate mitigation measures to be put in place.

Natural England also welcomes the comparison with the previous assessment. However, from the Table of Contents that was presented with the Piling strategy, it says that the strategy will be compared with the 2012 assessment. Natural England would like to clarify if this is meant to say 2021 rather than 2012?

For clarification of any points in this letter, please contact me using the details provided below.

Yours sincerely,

[Redacted signature block]

The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

[Redacted signature block]

## **Annex 1**

### **European Protected Species**

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's [REDACTED] publication.

If the application requires planning permission, it is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [REDACTED] on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant planning permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help developers and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after planning permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on [REDACTED]



## **A.8.3 Response from the Planning Inspectorate regarding the meeting minutes**

#### Enquiry:

The Inspectorate attended an online Steering Group for the Morgan Generation Assets and Mona Offshore Wind Projects. The meeting provided a project update and an update on the approach to the Habitats Regulations Assessment (HRA), as well as an overview of progress and agreement reached as part of the Expert Topics Groups. The Applicant also outlined its proposed approach to manage underwater noise impacts on fish and marine mammals (a Piling Strategy) and requested any comments on this approach.

#### Advice given:

The Applicant proposed that the Information to Inform an Appropriate Assessment (ISAA) report is split into three parts, to assist with production and navigation of the document. Part 1 of the ISAA would provide an overview of the Habitats Regulations Assessment (HRA) in general, background information and methodologies. Part 2 would present the assessment of effects on Special Areas of Conservation (SACs) and part 3 would present the assessment of effects on Special Protection Areas (SPAs).

The Inspectorate considers this is an acceptable approach, subject to clear cross referencing being provided between the different parts of the ISAA (as required).

The Applicant outlined why it does not consider a Site Integrity Plan (SIP) (including defined thresholds for cumulative effects of piling - 10% in a particular season, or 20% on a particular day) to be appropriate to manage underwater noise impacts from Mona and Morgan Generation. The Applicant stated that Mona and Morgan Generation are not predicted to reach the 10% area threshold for the nearest harbour porpoise SAC (i.e. North of Anglesey Marine SAC), either alone or in-combination with other projects.

The Applicant is instead looking to agree a mechanism (similar to SIPs) that would allow it to agree an approach to managing underwater noise impacts post consent, when more details of the project construction for the individual projects and more detail on cumulative projects in the region is known. The Applicant is considering a "Piling Strategy" (name TBC) as a method of achieving this. The Piling Strategy would set out potential mitigation options which could be employed if there are residual concerns about the cumulative impacts of underwater noise following refined project design. The Applicant noted such matters are often agreed in principle at the application stage with final agreement achieved post consent with the final project design. The Applicant stated that it could potentially provide an outline plan for draft document review during the pre-application phase, so the stakeholders and Secretary of State can have confidence that this will be effective and agreed post consent.

The Inspectorate considers the approach set out by the Applicant to be acceptable in principle. It advised the Applicant to ensure its approach accounts for the worst case scenario and therefore, that any altering of the project design post any consent would only decrease impacts. Cumulative scenarios should include consideration of concurrent piling and detonation of Unexploded Ordnance (UXO). However, the Applicant should make efforts to discuss and agree the approach (including the content of the draft/outline Piling Strategy) with relevant consultation bodies including Natural England, Natural Resources Wales and the Marine Management Organisation and should justify the approach taken in the HRA Report.

Any assumptions used in the definition of applicable worst case scenarios should be explained in the ES.

The Applicant was not able to commit to submitting a draft/ outline Piling Strategy with the Development Consent Order (DCO) application at this time, but confirmed it would look to consult on the draft Piling Strategy ahead of an Examination and that it would be submitted during the Examination. The Inspectorate advised that an Examining Authority is likely to look for evidence of consultation and agreement with the Statutory Nature Conservation Bodies on the content of the draft/ outline Piling Strategy.

Section 55 of the Planning Act 2008 (Regulation 5(2) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 refers) requires that the DCO application must be accompanied by sufficient information that will enable the Secretary of State to make an appropriate assessment of the implications for European sites if required by Regulation 48(1) of the Habitats Regulations. The Inspectorate advises that if the Piling Strategy is being relied upon to mitigate impacts on European site(s), the draft/ outline Piling Strategy should be provided with the DCO application. This could otherwise present a risk that the application for development consent may not be accepted for Examination.

If the Piling Strategy is not being relied upon to mitigate impacts on European site(s), where possible the Applicant should submit a draft/ outline Piling Strategy with the DCO application, as it is possible that this would otherwise be sought by an Examining Authority prior to commencement of an Examination.

## **A.8.4 Response from Cefas regarding the meeting minutes**

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Mona and Morgan Generation Sixth Steering Group - response from CEFAS UWN Team  
**Date:** 17 November 2023 16:48:22  
**Attachments:** [Picture \(Device Independent Bitmap\) 1.jpg](#)  
[Picture \(Device Independent Bitmap\) 2.jpg](#)

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**CAUTION:** This email originated from outside of RPS.

[REDACTED]

Following the above meeting we forwarded the slides and questions sent over on to the CEFAS UWN Team for their comment. Please see below:

I have reviewed the following document: 'Morgan and Mona offshore wind Projects Steering Group meeting 6 PowerPoint slides, dated October 2023'.

I have discussed the proposed approach of a Piling Strategy with our noise team. We would be interested to hear Natural England's views on this, specifically the applicant's view that a SIP is not considered appropriate to manage noise impacts.

I note in the accompanying slides that "*Mona and Morgan Generation are not predicted to reach the 10% area threshold for the nearest harbour porpoise SAC (i.e. North of Anglesey Marine SAC), either alone or in-combination with other projects*". What about the 20% daily disturbance threshold?

If a Piling Strategy is agreed as the preferred approach, then it would be helpful to set out in advance the conditions under which noise abatement, for example, will be required, so that there is a clear set of boundaries within which the developer will be working. This approach would still allow for the construction planning to evolve, but it would also give confidence that appropriate safeguards are in place at the stage of giving consent to the project, rather than leaving it to time-pressured discussions (which is too often the case) after consent has been granted.

Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

**Our MMO Values:** Together we are **Accountable**, **Innovative**, **Engaging** and **Inclusive**



*Enabling sustainable growth in our marine area*

The MMO 'call for evidence - MMO assessment of fishing impacts in marine protected areas - Stage 2' is now open. To respond please go to Citizen Space: <https://consult.defra.gov.uk/mmo/call-for-evidence-stage-2/>

To receive information from the MMO's Marine Conservation Team regarding marine protected areas in England, please email "Contact me" to



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## **A.8.5 Response from JNCC regarding the meeting minutes**

**From:**



**Subject:**

RE: Morgan Mona steering group meeting 5

**Date:**

23 November 2023 15:56:45

**Attachments:**

[image001.png](#)

[image002.png](#)



I've had feedback from our marine mammal specialists regarding the proposed Piling Strategy and can confirm that, having discussed this internally and with NRW, JNCC are content with the approach proposed.

Many thanks for your patience on this one.

Kind regards,





## **A.8.6 Response from NRW regarding the meeting minutes**

**From:**

[REDACTED]

[REDACTED]

**Subject:** RE: Morgan Mona steering group meeting 5

**Date:** 13 November 2023 13:58:27

**Attachments:** [20231017\\_Morgan\\_Mona\\_SG05\\_MoM\\_DRAFT\\_F01\\_NRW\\_Comments.docx](#)

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**CAUTION:** This email originated from outside of RPS.

[REDACTED]

Please find attached minor NRW amendments on the minutes from the Mona / Morgan Steering Group Meeting 5. Please also note the following:

- NRW Advisory confirm we are content for the Mona and Morgan Generation ISAAs to be split into 3 parts, but note it would be useful to be able to easily navigate between the documents through e.g. an overarching contents page with links to the separate sections.
- NRW Advisory welcome the Piling Strategy approach, the outline Table of Contents and the intention to consider noise abatement as an option for management and mitigation, and we anticipate the approach will help address concerns raised at PEIR. We believe further discussion on the Piling Strategy will be conducted through the Marine Mammal EWG, but it would be useful to have advanced warning of when / an indication of whether it will be discussed at the start / end of the meeting to enable our Fish Specialist to also input to the discussion.

Kind regards,

[REDACTED]