Partners in UK offshore wind

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Planning statement

Planning Inspectorate Reference Number: EN010136

Document Number: MRCNS-J3303-RPS-10101

Document Reference: J2

APFP Regulations: 5(2)(q)

April 2024

F01

Image of an offshore wind farm

www.morganandmona.com/morgan

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Application	RPS	Morgan Offshore Wind Ltd.	Morgan Offshore Wind Ltd.	April 2024

Prepared by:

RPS

Prepared for:

Morgan Offshore Wind Ltd.

Contents

Tables

Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Climate change	A change in global or regional climate patterns, in particular a change apparent from the mid to late 20th century onwards and attributed largely to the increased levels of atmospheric carbon dioxide produced by the use of fossil fuels.
Climate emergency	A situation in which urgent action is required to reduce or halt climate change and avoid potentially irreversible environmental damage resulting from it.
Climate resilience	The capacity of social, economic and ecosystems to cope with a hazardous event or trend or disturbance.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project.
Emissions	An amount of a substance that is produced and sent out into the air that is harmful to the environment, especially carbon dioxide.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment process for the Morgan Offshore Wind Project.
Fossil fuel	A hydrocarbon-containing material formed naturally in the earth's crust from the remains of dead plants and animals.
Geophysical surveys	Surveys of the seabed which collect data on seabed form and boulder mapping.
Geotechnical surveys	Surveys of the seabed which collect data on underlying seabed geology and rock layers.
Greenhouse Gas (GHG)	A gas that absorbs and emits radiant energy within the thermal infrared range, causing the greenhouse effect. Examples include carbon dioxide and methane.
Greenhouse effect	The trapping of the sun's warmth in a planet's lower atmosphere, due to the greater transparency of the atmosphere to visible radiation from the sun than to infrared radiation emitted from the planet's surface.
Hydrodynamics	Physical processes of water movement e.g. ocean currents.
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.
International commitments	Commitments made publicly on the international level.
Local impact report	A report in writing giving details of the likely impact of the proposed development on the authority's area.
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 a 'deemed marine licence' as part of the Development Consent Order process.

Term	Meaning
Maximum Design Scenario (MDS)	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.
Micrositing	The final selection of the position of infrastructure which may move in the order of a few metres to avoid an obstruction.
Morecambe Offshore Windfarm: Generation Assets	The Morecambe Offshore Windfarm is located in the east Irish Sea approximately 28.75km (15.5nm) from the northwest coast of England (when measured from Mean High Water Springs (MHWS)). The anticipated nominal capacity of the Morecambe Offshore Windfarm is 480MW.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms forming part of the Morgan Offshore Wind Project will be located.
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.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (including all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
Morgan Offshore Wind Project Generation Assets PEIR	The Morgan Generation Assets Preliminary Environmental Information Report (PEIR) that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan Offshore Wind Project Generation Assets.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the offshore substation platforms, interconnector cables, Morgan offshore booster station, offshore export cables, landfall site, onshore export cables, onshore substations, 400kV grid connection cables and associated grid connection infrastructure such as circuit breaker infrastructure (as defined in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets PEIR).
National Policy Statement(s) (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2023.
Nationally Significant Infrastructure Project (NSIP)	Large scale development including power generating stations which requires development consent under the Planning Act 2008. An offshore wind farm project with a capacity of more than 100MW in England, or 350MW in Wales, constitutes a Nationally Significant Infrastructure Project.
Net zero	A target of completely negating the amount of greenhouse gases produced by human activity either worldwide or by a country or organisation, to be achieved by reducing emissions and implementing methods of absorbing carbon dioxide from the atmosphere.
Offshore Substation Platform (OSP)	A fixed structure located within the wind farm sites, containing electrical equipment to aggregate the power from the wind turbine generators and convert it into a more suitable form for export to shore.
Pathway to 2030 Holistic Network Design	Suite of documents that together set out a coordinated approach for connecting 23GW of offshore wind following an integrated design that supports the large-scale delivery of electricity generated from offshore wind, taking power to where it's needed across Great Britain.
Policy	A set of decisions by governments and other political actors to influence, change, or frame a problem or issue that has been recognized as in the political realm by policy makers and/or the wider public.

Term	Meaning
Project Design Envelope (PDE)	The Project Design Envelope sets out the design assumptions and parameters from which the realistic MDSs are drawn for the Morgan Generation Assets Environmental Impact Assessment. This is also often referred to as the 'Rochdale Envelope' approach.
Protected species	A species of animal or plant which it is forbidden by law to harm or destroy.
Ramsar sites	Wetlands of international importance that have been designated under the criteria of the Ramsar Convention. In combination with Special Protection Areas and Special Areas of Conservation, these sites contribute to the national site network.
Renewable energy	Energy from a source that is not depleted when used, such as wind or solar power.
Sites of Community Importance (SCIs)	Sites which, in the biogeographical region or regions to which they belong, contribute significantly to the maintenance or restoration at a favourable conservation status of a natural habitat type.
Special Areas of Conservation (SAC)	A site designation specified in the Conservation of Habitats and Species Regulations 2017. Each site is designated for one or more of the habitats and species listed in the Regulations. The legislation requires a management plan to be prepared and implemented for each Special Area of Conservation to ensure the favourable conservation status of the habitats or species for which it was designated. In combination with Special Protection Areas and Ramsar sites, these sites contribute to the national site network.
Special Protection Area (SPA)	A site designation specified in the Conservation of Habitats and Species Regulations 2017, classified for rare and vulnerable birds, and for regularly occurring migratory species. Special Protection Areas contribute to the national site network.
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
The Secretary of State for Energy Security and Net Zero	The decision maker with regards to the application for development consent for the Morgan Offshore Wind Project Generation Assets.
Unexploded Ordnance	Remains of explosive devices that did not detonate when they were deployed.
Water quality	The chemical, physical, and biological characteristics of water based on the standards of its usage.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.

Acronyms

Acronym	Description
ADD	Acoustic Deterrent Devices
AEoI	Adverse Effect on Integrity
AEZ	Archaeological Exclusion Zone
AHEF	Archaeology and Heritage Engagement Forum
ALARP	As Low as Reasonably Practicable
CAA	Civil Aviation Authority

Acronym	Description
CEA	Cumulative Effect Assessment
CCC	Committee on Climate Change
CCUS	Carbon Capture, Usage and Storage
CFLO	Company Fisheries Liaison Officer
CNP	Critical National Priority
CNS	Communication, Navigation and Surveillance
CoP	Conference of Parties
DCO	Development Consent Order
Defra	Department for Environment Food and Rural Affairs
EIA	Environmental Impact Assessment
EMF	Electromagnetic Field
EWG	Expert Working Group
EPP	Evidence Plan Process
FIR	Fishing Industry Representative
GHG	Greenhouse Gas
GVA	Gross Value Added
HDD	Horizontal Directional Drilling
HDNR	Holistic Design Network Review
HND	Holistic Network Design
HRA	Habitats Regulations Assessment
ICCI	In-Combination Climate Impact
ICFA	Inshore Fisheries and Conservation Authorities
IEF	Important Ecological Features
INNS	Invasive Non-Native Species
IMO	International Maritime Organisation
ISAA	Information to Support the Appropriate Assessment
LNG	Liquified Natural Gas
LSE	Likely Significant Effect
MCAA	Marine and Coastal Access Act 2009
MCZ	Marine Conservation Zone
MDS	Maximum Design Scenario
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MNEF	Marine Navigation Engagement Forum
MNR	Marine Nature Reserves
MMMP	Marine Mammal Mitigation Protocol

Acronym	Description
MMO	Marine Management Organisation
MPA	Marine Protected Areas
MPS	Marine Policy Statement
MU	Management Units
NAS	Noise Abatement Systems
NGESO	National Grid Electricity System Operator
NPS	National Policy Statement
NPPF	National Planning Policy Framework
NRA	Navigational Risk Assessment
NRP	Natural Resources Policy
NRW	Natural Resources Wales
NSIP	Nationally Significant Infrastructure Project
OEMP	Offshore Environment Management Plan
OFLCP	Outline Fisheries Liaison and Co-existence Plan
OLS	Obstacle Limitation Surfaces
OTNR	Offshore Transmission Network Review
OSP	Offshore Substation Platform
OWES	Offshore Wind Environmental Standards
PAD	Protocol for Archaeological Discoveries
PDE	Project Design Envelope
PEIR	Preliminary Environmental Information Report
PSR	Primary Surveillance Radar
PTS	Permanent Threshold Shift
REZ	Renewable Energy Zone
RYA	Royal Yachting Association
SMP	Shoreline Management Plan
PTS	Permanent Threshold shift
SAC	Special Area of Conservation
SAR	Search and Rescue
SCI	Sites of Community Importance
SIP	Site Integrity Plan
SNCBs	Statutory Nature Conservation Bodies
SPA	Special Protection Areas
SoS	Secretary of State
SSC	Suspended Sediment Concentrations
SSSI	Site of Special Scientific Interest

Acronym	Description
SPI	Species of Principal Importance
TCE	The Crown Estate
TTS	Temporary Threshold Shift
TSS	Traffic Separation Scheme
UWSMS	Underwater Sound Management Strategy
UXO	Unexploded Ordnance
WFD	Water Framework Directive
WSI	Written Scheme of Investigation

Units

Unit	Description
%	Percent
km^2	Square kilometres
km	Kilometres
nm	Nautical miles
GW	Gigawatts
MW	Megawatts
°C	Degrees Celsius
TWh	Terrawatt Hour

Executive Summary

1.1.1.1 This Planning Statement has been prepared on behalf of Morgan Offshore Wind Limited (the Applicant) and accompanies a Development Consent Order (DCO) application under Section 37 of the Planning Act 2008 for the Morgan Offshore Wind Project: Generation Assets (hereafter Morgan Generation Assets). The Morgan Generation Assets is an offshore wind farm within English waters with a proposed electricity generating capacity of over 100 megawatts.

1.1.1.2 The Morgan Generation Assets comprises an offshore array area of up to 96 wind turbines in English waters, which is the focus of this application, a single part of the wider consenting process for the overarching Morgan Offshore Wind Project. The export cable, landfall of offshore export cables and other onshore elements will be covered by a separate application under the name of Morgan and Morecambe Transmission Assets, which will work collaboratively with Morecambe Offshore Windfarm on a grid connection at Penwortham in Lancashire. As such none of these elements are discussed in this Planning Statement.

1.1.1.3 The Morgan Generation Assets Environment Impact Assessment (EIA) process has employed a Maximum Design Scenario approach, also known as the Rochdale Envelope approach. This approach is consistent with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (Planning Inspectorate, 2018). This provides flexibility, while ensuring all potentially significant effects (positive or adverse) are assessed within the EIA process and reported in the Environmental Statement. The Morgan Generation Assets are in the early stages of the development process. Therefore, the project description is indicative, and the 'envelope' has been designed to include flexibility to accommodate further project refinement during detailed design, post consent.

1.1.1.4 The installation of the Morgan Generation Assets would assist with realising the UK Government's ambition within its National Policy Statements of delivering up to 50 gigawatts of offshore wind by 2030 and contributing to the UK's energy security. The proposal in its entirety sits offshore, meaning it is outside the boundary of any local authority and consequently local planning policy consideration is not applicable.

1.1.1.5 The Morgan Generation Assets would make a positive contribution to reducing carbon emissions and make a significant contribution to UK renewable energy targets. The UK's ambition is to lead the world in combatting climate change, reducing reliance on fossil fuels and embracing a future where renewable energy powers homes and businesses. At the centre of this drive is a commitment to reducing UK greenhouse gas emissions and reaching net zero by 2050. The UK government has an ambition to generate 50 GW of clean, renewable energy from offshore wind by 2030.

1.1.1.6 The Morgan Generation Assets has a critical role to play, both in helping the UK to achieve its net zero ambitions and, specifically, in reaching offshore wind generation goals. Further, the additionalf renewable energy generated by the Morgan Generation Assets will contribute to increased overall energy security and network resilience, which is required to meet future energy demand.

1.1.1.7 The Morgan Generation Assets will contribute to the UK economy by providing socio-economic benefits through employment opportunities and low-cost energy to consumers.

1.1.1.8 This Planning Statement outlines a detailed assessment of the Morgan Generation Assets against relevant National Policy Statements and marine policy considerations.

This assessment demonstrates that the Morgan Generation Assets accords with these policies.

1.1.1.9 The construction, operations and maintenance, and decommissioning of the Morgan Generation Assets would be carried out in accordance with the relevant National Policy Statements and other identified material planning policy matters. Where there are predicted impacts from the Morgan Generation Assets , appropriate and proportionate mitigation measures are proposed.

1.1.1.10 The need for the Morgan Generation Assets and offshore wind in general is also clearly supported by the National Policy Statements, in addition to wider governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy.

1.1.1.11 In consideration of the above, the Secretary of State can conclude that the proposed Morgan Generation Assets:

- Accords with the requirements of section 104 of the Planning Act 2008
- Contributes to meeting renewable energy targets and providing energy security
- Assists in reducing carbon emissions
- Brings significant socioeconomic and environmental benefits that would outweigh any adverse impacts
- Complies with national and marine policy.

2 Planning statement

2.1 Introduction

2.1.1 Purpose of the planning statement

2.1.1.1 This Planning Statement has been prepared by RPS on behalf of Morgan Offshore Wind Limited (the Applicant), a joint venture of bp Alternative Energy investments (hereafter referred to as bp) and Energie Baden-Württemberg AG (hereafter referred to as EnBW), who is developing the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the Morgan Generation Assets). The Morgan Generation Assets is a proposed offshore wind farm located in the east Irish sea. This Planning Statement is submitted as part of a Development Consent Order (DCO) application for the Morgan Generation Assets.

2.1.1.2 As the Morgan Generation Assets is an offshore generating station with a capacity greater than 100 MW located wholly in English waters, it is a Nationally Significant Infrastructure Project (NSIP) as defined by Section 15(3) of the Planning Act 2008 (as amended) (the 2008 Act). As such, there is a requirement to submit an application for a DCO to the Planning Inspectorate to be decided by the Secretary of State (SoS) for Energy Security and Net Zero. A marine licence is required before carrying out any licensable marine activity under the Marine and Coastal Access Act 2009. For the Morgan Generation Assets, two marine licences will be deemed under the DCO for licensable activities in English waters.

2.1.1.3 The Planning Statement is one of a series of documents that accompanies the DCO application submitted in accordance with Section 37 of the 2008 Act and Regulations 5 and 6 of the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 (the 'APFP Regulations'). The APFP Regulations do not require a planning statement to support DCO applications; however, in order to assist the SoS in determining the application, it is considered helpful to bring all the principle matters together into one statement in order to consider them in the context of relevant policy.

2.1.1.4 The Morgan Generation Assets has been subject to an Environmental Impact Assessment (EIA), the outcomes of which have been reported in the Environmental Statement that also accompanies the DCO application. The Environmental Statement has been prepared in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 2017 EIA Regulations).

2.1.1.5 Aspects concerning the need for the Morgan Generation Assets (section 1.4), the site selection process and alternative designs and technologies considered by the Applicant during the design-development process are explained fully in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) and presented in summary form within this Planning Statement. The full legislative and policy context relating to renewable energy within which the Morgan Generation Assets would be progressed is set out fully in Volume 1 Chapter 2 of the Environmental Statement (Document Reference F1.2). This Planning Statement provides the policy context which the Morgan Generation Assets should be tested against and assesses how the project complies with relevant policies.

2.1.1.6 The outcomes of the EIA (in the form of the Environmental Statement) and the Habitat Regulations Assessment (HRA) (in the form of the Information to Support the Appropriate Assessment (ISAA) (Document Reference E1.1 to E1.3)) have informed the content of this Planning Statement, specifically in relation to assisting the

determination of accordance of the Morgan Generation Assets with relevant National Policy Statements (NPSs).

2.1.1.7 The Planning Statement is structured as follows:

- Section 1.1: Introduction
- Section 1.2: Application location and project description

  This section summarises the project description that is set out in full in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3), describing all the offshore components necessary to deliver the Morgan Generation Assets
- Section 1.3: Relevant legislation and policy

  This section sets out the legislative and policy context that is considered relevant to the determination of the DCO application.
- Section 1.4: Need for the Morgan Generation Assets

  This section of the Planning Statement sets out the need case for the Morgan Generation Assets, in the context of national, European and international policy and legislation.
- Section 1.5: Accordance with NPSs and other national policy

  This section considers the relationship of the Morgan Generation Assets with the topic-specific planning policies set out in NPS Overarching National Policy Statement for Energy (NPS EN-1) and NPS for Renewable Energy Infrastructure (NPS EN-3). Consideration of other planning policies are described under the 'other policy considerations' heading for each topic.
- Section 1.6: Balance of considerations and overall conclusions

  This section provides an overview of the need for the Morgan Generation Assets, sets out the Morgan Generation Assets benefits and effects and weighs up the planning balance in an overall conclusion. It concludes that the Morgan Generation Assets, as a Critical National Priority infrastructure project, is urgently needed and the presumption in favour of consenting the Morgan Generation Assets, as set out in particular in NPS EN-1 paragraphs 3.3.63 and 4.1.7, is unaffected by its residual effects.

2.1.2 About the Applicant

2.1.2.1 The Applicant is a joint venture between two leading energy companies (bp and EnBW). The two companies are working together as partners to deliver offshore wind projects in both Offshore Wind Leasing Round 4 and ScotWind Leasing.

2.1.2.2 EnBW is one of the largest energy supply companies in Germany and supplies electricity, gas, water and energy solutions and energy industry services to around 5.5 million customers with a workforce of more than 27,000 employees. EnBW aims to strengthen its position as a sustainable and innovative infrastructure partner for customers, citizens and local authorities to an even greater extent. The repositioning of EnBW with a focus on renewable energies and smart infrastructure solutions is a key component of its strategy. With a focus on renewable energy and smart infrastructure solutions, EnBW's objective is for half of the electricity it supplies to be from renewable sources by the end of 2025. This is already having a noticeable effect on the reduction of CO2 emissions, which EnBW aims to halve by 2030 and to be

climate neutral by 2035. EnBW has been involved in the operation of hydro power plants in the Black Forest for more than 100 years and has a large and continuously growing number of onshore wind farms and solar photovoltaics in Germany, France and Sweden. In addition, EnBW developed, constructed and operates four offshore wind farms in Germany (EnBW Baltic 1, Baltic 2, Hohe See and Albatros) with a total installed capacity of 945 MW, commissioned between 2011 and 2020. A further 900 MW offshore wind farm, He Dreiht, is currently under development in Germany.

2.1.2.3 bp has set out an ambition to be a net-zero company by 2050 or sooner, and to help the world get to net zero. Bp has set out a strategy for delivering this ambition. Bp is focused on delivering its transformation into an integrated energy company, helping to provide the energy the world needs today, and investing in the energy transition.

2.1.2.4 In January 2021, bp and Equinor agreed to develop together two major lease areas located in federal waters off New York and Massachusetts, Empire Wind and Beacon Wind. In January 2024, bp and Equinor announced that bp will take ownership of Equinor's 50% stake in the Beacon Wind US offshore wind projects and Equinor will take ownership of bp's 50% stake in the Empire Wind US offshore wind projects. Subject to closing the transaction, bp will work independently to develop Beacon 1 and Beacon 2 on a wholly owned basis. Beacon Wind 1 and 2 comprise a combined potential generative capacity in excess of approximately 2.5 GW. In the UK, bp and partner EnBW are leading the development of the Morgan and Mona offshore wind projects in the Irish Sea and the Morven offshore wind project in the North Sea. These projects have a combined potential generating capacity of 5.9 GW, sufficient to power the equivalent of around 6 million UK households. In early 2023, bp was successful in its bid to develop its first floating offshore wind demonstration project offshore Aberdeenshire.

2.1.2.5 In July 2023, bp was successful in its bids for two sites offshore in Germany with a potential generating capacity of 4 GW. Bp has formed a strategic partnership with Japanese conglomerate Marubeni to explore offshore wind opportunities in Japan. Bp has also formed a JV with Norway's Deep Wind Offshore, a part of which saw bp acquire a 55% stake in the company's early-stage offshore wind portfolio, which includes four projects across the Korean Peninsula.

2.1.2.6 bp already has an onshore wind business in the US with a gross generating capacity of 1,700 MW, operating nine wind assets across the country. On 30 November 2023, bp announced that it agreed to acquire the 50.03% interest it does not already own in Lightsource bp, a global leader in utility-scale solar. The deal is expected to complete in the second half of 2024, subject to regulatory approvals.

2.2 Application location and project description

2.2.1 Introduction

2.2.1.1 Morgan Offshore Wind Limited (the Applicant), a joint venture of bp Alternative Energy Investments Ltd. (hereafter referred to as bp) and Energie Baden-Württemberg AG (hereafter referred to as EnBW) is developing the Morgan Offshore Wind Project. The Morgan Offshore Wind Project and the Morecambe Offshore Windfarm (developed by Morecambe Offshore Wind Farm Ltd a joint venture between Cobra Instalaciones Servicios, S.A. and Flotation Energy plc) have been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR). Under the OTNR, the National Grid Electricity System Operator is responsible for conducting a Holistic Network Design Review to assess options to improve the coordination of

offshore wind generation connections and transmission networks. The output of this process concluded that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively on a coordinated grid connection at Penwortham in Lancashire.

2.2.1.2 A coordinated grid connection for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm will be delivered as part of a separate transmission assets application for consent.

2.2.1.3 The parameters required for the construction, operations and maintenance and decommissioning phases of the Morgan Generation Assets are based on the design information and the current understanding of the receiving environment.

2.2.2 Project location

2.2.2.1 The Morgan Array Area (which includes The Morgan Generation Assets infrastructure, including the wind turbines, foundations, inter-array cables, OSPs, scour protection, cable protection and interconnector cables)) is 280 km2 in area and is located 22.22 km (12 nm) from the Isle of Man coastline, 37.13 km (20.1 nm) from the northwest coast of England and 58.5 km (31.7 nm) from the Welsh coastline (Anglesey) (when measured from Mean High Water Springs (MHWS)). The Morgan Array Area is located wholly within English offshore waters (beyond 12 nm from the English coast) and its location is shown in the submitted Location Plan (Document Reference B1).

2.2.3 Project description

2.2.3.1 The Morgan Offshore Wind Project has been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify and wherever possible facilitate collaborative approach to offshore wind projects connecting to the UK National Grid. Under the OTNR, the National Grid Electricity System Operator (NGESO) is responsible for assessing options to improve the coordination of offshore wind generation connections and transmission networks and has undertaken a Holistic Network Design Review (HNDR). In July 2022, the UK Government published the 'Pathway to 2030 Holistic Network Design' documents, which set out the approach to connecting 50 GW of offshore wind to the National Grid (NGESO, 2022). A key output of the HNDR process was the conclusion that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. Although the projects are being developed by separate companies, Ih means it is not feasible for all aspects of both projects to be consented under a single application, the Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham.

2.2.3.2 Given the grid connection arrangements, the consenting strategy for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm is as follows:

2.2.3.3 A stand-alone DCO application to consent the construction, operations and maintenance, and decommissioning of the generation assets of the Morgan Offshore Wind Project

2.2.3.4 A stand-alone DCO application to consent the construction, operations and maintenance, and decommissioning of the generation asset of the Morecambe Offshore Windfarm

2.2.3.5 A separate application to consent the construction, operations and maintenance and decommissioning of the transmission assets required to enable the export of electricity from both the Morgan Generation Assets and the Morecambe Offshore Windfarm to the National Grid entry point at Penwortham.

2.2.3.6 In order to achieve this, the Applicant, together with the applicant for the Morecambe Offshore Windfarm, has requested, and been granted, a direction from the Secretary of State under section 35 of the 2008 Act to pursue a transmission assets consent (covering both projects' offshore and onshore transmission infrastructure) through the DCO process.

2.2.4 Key components of the Morgan Generation Assets

2.2.4.1 The key components of the Morgan Generation Assets include:

- Offshore wind turbines
- Foundations (for wind turbines and Offshore Substation Platforms (OSPs))
- Scour protection
- Cable protection
- Inter-array cables linking the individual wind turbines to the OSPs
- High Voltage Alternating Current (HVAC) transmission system including:
- OSPs
- Interconnector cable(s).

2.2.4.2 The area where the Morgan Generation Assets infrastructure will be located is referred to as the Morgan Array Area throughout this project. The term Morgan Generation Assets is used to refer to the project including all works associated with construction, operations and maintenance and decommissioning of the Morgan Array Area.

2.2.5 Site selection

2.2.5.1 The site selection process, including alternatives considered and any refinements to the Morgan Generation Assets that have taken place as a result of the EIA process in response to consultation and stakeholder feedback, technical studies, landowner engagement, engineering feasibility etc, is presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).

2.2.6 Project Design Envelope

2.2.6.1 The Project Design Envelope (PDE) approach (also known as the Rochdale Envelope approach) has been adopted for the EIA, in accordance with current industry good practice. This approach allows for a project to be assessed on the basis of a Maximum Design Scenario (MDS) (i.e. the worst-case scenario) in order to provide flexibility, while ensuring all potentially significant effects are assessed within the EIA process and reported in the Environmental Statement. The PDE approach allows for some flexibility in project design options, where the full details of a project are not known at DCO application submission stage.

2.2.6.2 This approach has been taken for the EIA because it is not possible to provide precise final design details of the Morgan Generation Assets a number of years ahead of the

time it will be constructed. Offshore wind is a constantly evolving industry with a constant focus on cost reduction, therefore improvements in technology and construction methodologies occur frequently and an unnecessarily prescriptive approach could preclude the adoption of new technology and methods or result on an economically unviable consent.

2.2.6.3 The use of the PDE approach has been recognised in NPS EN-1 and NPS EN-3, which are considered in section 2.3below. The PDE approach is also consistent with the Planning Inspectorate's Advice Note Nine: Rochdale Envelope (The Planning Inspectorate, 2018).

2.2.6.4 There have been a number of refinements to the Morgan Generation Assets primarily following consultation on the PEIR. These refinements have mitigated impacts on receptors such as shipping and navigation and commercial fisheries and are an example of the Applicant's iterative approach to design. Further, the Applicant has considered feedback from statutory and non-statutory consultation to date to inform the design process.

2.3 Relevant legislation and policy

2.3.1 Introduction

2.3.1.1 This section outlines the legislative and policy framework that is relevant to the Morgan Generation Assets and, in particular, that which should be considered by the Secretary of State when determining this application for development consent under the Planning Act 2008.

2.3.2 International obligations on climate change

2.3.2.1 The United Nations Convention on Climate Change supreme decision-making body is termed the Conference of Parties (CoP) which reviews the implementation of the Convention and any other legal instruments that the CoP adopts and takes decisions necessary to promote the effective implementation of the Convention, including institutional and administrative arrangements. In 2021, the CoP was held in Glasgow. The conference negotiated a global agreement (UNFCCC) 2021) with the key goal of limiting increases of global temperatures to 'well below 2°C compared to pre-industrial levels'. The parties also agreed to "pursue effects to limit the temperature increase to 1.5°C". This was a development of the earlier United Nations (2015) agreement for a binding and universal agreement on climate from all the parties. The (UNFCCC) 2021 agreement was reached by 196 parties, seeking to prevent a "climate catastrophe" by keeping temperature rises within 1.5°C.

2.3.3 National obligations on climate change

2.3.3.1 The Climate Change Act 2008 (the Climate Act) is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases (GHG) are reduced and that climate change risks are adapted to.

2.3.3.2 Through the Climate Act, the UK government has set a target to significantly reduce UK GHG emissions by 2050 and a path to get there. The Climate Act also established the Committee on Climate Change (CCC) to ensure that emissions targets are evidence-based and independently assessed. In addition, the Climate Act requires the

Government to assess the risks and opportunities from climate change for the UK, and to adapt to them.

2.3.3.3 The Climate Act commits the UK government by law to reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming'.

2.3.4 UK Governments energy ambitions

2.3.4.1 An ambition set out in the UK Government's Energy White Paper, 'Powering our Net Zero Future' 2021, the Net Zero Strategy: Build Back Greener (2021) and the British Energy Security Strategy (2022) is to have 40GW offshore wind by 2030, a fourfold increase on today's installed capacity. This aligns with the Prime Minister's Ten Point Plan for a Green Industrial Revolution (2020). In addition, the UK Government would generate more power than all our homes use today, back new innovations to make the most of this proven technology and invest to bring new jobs and growth to our ports and coastal regions.

2.3.4.2 The Morgan Generation Assets will contribute towards the British Energy Security Strategy's recently revised target of 50 GW of offshore wind by 2030 set out in the UK Government's 2022 Energy Security Statement.

2.3.5 Planning legislation

The Planning Act 2008

2.3.5.1 The 2008 Act (as amended) is the primary legislation that establishes the legal framework for the preparation, examination and determination of applications for DCOs for NSIPs. It sets out the consenting system for all NSIPs, including those in the energy sector.

2.3.5.2 Amendments have been made to the planning system that are applicable to the Planning Act 2008. Under the Localism Act 2011, the Planning Inspectorate became the executive agency responsible for the NSIP consenting process. Any developer wishing to construct a project that is classified as an NSIP must apply for a DCO. The Planning Inspectorate will examine the application submissions and make a recommendation to the SoS for the Department for Energy Security and Net Zero (DESNZ) to grant or refuse consent.

2.3.5.3 The 2008 Act sets out that for offshore generating station and transmission developments in English waters, the NSIP threshold is a generating capacity of over 100 MW.

2.3.5.4 The Morgan Generation Assets will include up to 96 wind turbines. The maximum proposed number of turbines has been reduced from 107 proposed in the Preliminary Environmental Information Report (PEIR). The proposed capacity of the Morgan Generation Assets is over 100 MW; therefore it exceeds the 2008 Act threshold for an NSIP. The final capacity of the Morgan Generation Assets will be determined based on available technology and constrained by the design envelope of the wind turbines.

2.3.5.5 Section 104 of the 2008 Act makes it clear that in determining a DCO application the SoS must take into account any relevant NPS, any appropriate Marine Policy

Statement (MPS), any local impact report, any matters prescribed in relation to the development and any matters the SoS considers important and relevant.

2.3.5.6 The Morgan Generation Assets are entirely offshore, meaning it does not sit within the boundary of any local authority. As such, no local plans, local development frameworks, neighbourhood plans or local policy of any type are applicable. Consequently, the assessment purely examines Morgan Generation Assets against National Policy Statements and marine policy considerations, accordance with these aspects is demonstrated throughout.

Marine and Coastal Access Act 2009

2.3.5.7 The Marine and Coastal Access Act (MCAA) 2009 introduced, in parts 3 and 4, a marine planning system for overseeing the marine environment and a requirement to obtain a marine licence for certain activities and works at sea.

2.3.5.8 Section 149A of the 2008 Act allows an applicant for development consent to apply for a 'deemed marine licence' as part of the consenting process. The Marine Management Organisation (MMO) are the responsible authority for deemed marine licences in English waters and work with the Planning Inspectorate to ensure that deemed marine licences are transposed into the DCO. The MMO remain the regulatory and enforcement body in respect of the conditions and restrictions contained within the deemed marine licences.

2.3.5.9 Part 5 of the MCAA enables the designation of Marine Conservation Zones (MCZs) in England and Wales as well as UK offshore areas. Consideration of MCZs is required for any marine licence application or application for development consent which includes a deemed marine licence.

2.3.5.10 MCZs were a crucial consideration for the Morgan Generation Assets assessments and resulting design. A total of 10 MCZs were assessed, and the screening concluded that the Morgan Generation Assets are incapable of affecting (other than insignificantly) the protected features of the MCZs. It can therefore be concluded that there is no significant risk of the Morgan Generation Assets hindering the achievement of conservation objectives stated for any MCZ.

2.3.6 UK energy policy

National Policy Statements

2.3.6.1 The energy NPSs were first designated in 2001, following the context for them to be produced being set out under the Planning Act 2008. The NPSs have since been amended and following consideration before parliament, were formally designated on 17th January 2024.

2.3.6.2 NPSs describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the SoS when considering an application for development consent.

2.3.6.3 There are six energy NPSs, two of which are relevant to offshore wind development and therefore the Morgan Generation Assets:

- Overarching NPS for Energy (NPS EN-1) which sets out the UK Government's policy for the delivery of major energy infrastructure (Department for Energy Security & Net Zero, 2023a).

- NPS for Renewable Energy Infrastructure (NPS EN-3) (Department for Energy Security & Net Zero, 2023b).
- NPS for Electricity Networks Infrastructure (EN-5) which provides detail of electricity networks and assessment principles relating to electricity network applications.

2.3.6.4 These topics are discussed in detail below and their relevant accordance tables are located within the NPS tracker in Appendix A.

2.3.6.5 The key test is to assess, on balance, whether the application is in accordance with the relevant NPSs and whether any specified exceptions apply. This may include considering whether the policies set out in the NPSs for delivery of renewable energy are outweighed by any adverse impacts that have been identified, noting the presumption is in favour of applications which accord with any relevant NPSs. Section 3 discusses the Morgan Generation Assets accordance in detail.

2.3.7 Overarching National Policy Statement for Energy (EN-1)

2.3.7.1 This is the overarching energy NPS, setting out the broad basis for considering applications for development consent. It sets out the Government's policy for the delivery of major energy infrastructure. Paragraph 3.3.3 stresses the importance of ensuring that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand.

2.3.7.3 Paragraph 3.2.8 confirms that when determining applications for national infrastructure, the Secretary of State is "not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS."

2.3.7.4 Whilst there is a general presumption in favour of consenting Nationally Significant Infrastructure Projects (NSIPs) based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 – 3.3.63 of the NPS, the NPSs designated in January 2024 now include a strengthened presumption specifically in favour of critical national priority (CNP) infrastructure.

2.3.7.5 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirms that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

2.3.7.6 Section 4.2 of the NPS states which energy generating technologies are low carbon and are therefore CNP infrastructure. Paragraph 4.2.5 of NPS EN-1 confirms what constitutes CNP infrastructure and states that for electricity generation it includes "… all onshore and offshore generation that does not involve fossil fuel combustion…."

2.3.7.7 Therefore, as an offshore wind generation project that does not involve fossil fuel combustion, the Morgan Generation Asset is considered by NPS EN-1 to be low carbon CNP infrastructure.

2.3.7.8 The strengthened presumptions in favour of CNP infrastructure include that even "where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure" (paragraph 4.2.16). The paragraph then goes on to confirm " …in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."

2.3.7.9 Paragraph 4.6.16 then confirms that the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the

NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances. This includes development within Green Belts, development affecting Sites of Special Scientific Interest (SSSIs), development in nationally designated landscapes and where there is substantial harm to or loss of significance to heritage assets (paragraph 4.2.17). See also Figure 2 of NPS EN-1.

2.3.7.10 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 – 4.2.22 (see also Figure 3) confirm that the starting point is that energy security and decarbonising the power section to combat climate change are capable of amounting to imperative reasons of overriding public interest (IROPI) with the benefit to the public being capable of outweighing the risk of environmental damage. These paragraphs also confirm that the fact there are other potential projects deliverable in different locations to meet the need for CNP infrastructure is unlikely to be treated as an alternative solution. If there are no alternative solutions the compensation measures must be secured.

2.3.7.11 NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (Paragraph 4.2.21).

2.3.7.12 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 – 4.2.12 confirm that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements, that they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success.

2.3.7.13 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst this paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

2.3.7.14 None of the above exceptions apply to the Morgan Generation Assets.

2.3.7.15 In conclusion, therefore, NPS EN-1 confirms that “Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.” (paragraph 3.3.63).

2.3.7.16 There is therefore a strong presumption in favour of consenting the Morgan Generation Assets in accordance with NPS EN-1.

2.3.8 National Policy Statement for Renewable Energy Infrastructure (NPS EN- 3)

2.3.8.1 NPS EN-3 is the NPS for renewable energy infrastructure and sets out assessment principles in relation to the consideration of renewable projects.

2.3.8.2 Section 3 of NPS EN-3 contains the matters that need to be considered by applicants and the SoS in the general assessment of energy infrastructure, as well as technology specific information. Of relevance to the Morgan Generation Assets are:

- The factors influencing site selection and design
- Climate change adaptation

- Consideration of good design for energy infrastructure
- Flexibility in the project details
- Offshore wind.

2.3.8.3 NPS EN-3 outlines that offshore wind development, and the supporting onshore and offshore transmission infrastructure and related network reinforcements, are viewed by the Government as being a critical national priority (CNP) and should be progressed as quickly as possible.

2.3.8.4 Paragraph 2.8.1 states 'As set out in the British Energy Security Strategy, the Government expects that offshore wind (including floating wind) will play a significant role in meeting demand and decarbonising the energy system. The ambition is to deploy up to 50GW of offshore wind capacity (including up to 5 GW floating wind) by 2030, with an expectation that there will be a need for substantially more installed offshore capacity beyond this to achieve net zero carbon emissions by 2050.'

2.3.8.5 On the consenting process paragraph 2.8.7 states 'Given ambitions to deliver up to 50 GW of offshore wind by 2030, including up to 5 GW of floating wind, there is a need to speed up, and reduce delays in, the consenting process.'

2.3.8.6 Paragraph 2.8.64 confirms support for flexibility in the project details citing typical unknown project aspects whilst paragraph 2.8.66 bolsters support for flexibility for unforeseen events through micrositing. Where micrositing is requested by an Applicant paragraph 2.8.69 states the preferred tolerance should be factored into the EIA assessment of the development's worst case scenario.

2.3.8.7 Paragraph 3.8.13 states that "applicants for CNP infrastructure must continue to show how their application meets the requirements in NPS EN-1 and NPS EN-3, applying the mitigation hierarchy, as well as any other legal and regulatory requirements".

2.3.8.8 Paragraph 3.8.49 states that "Co-ordinated transmission proposals are principally developed through, and as a consequence of, a process of ongoing reform through the Offshore Transmission Network Review (OTNR) with the lead party or parties for the initial co-ordination proposals varying according to the different temporal workstreams. Further details are provided in EN-5, section 2.12".

2.3.8.9 The impacts arising from the development of energy infrastructure are identified in Part 5 of NPS EN-1, and paragraphs 3.8.107 to 3.8.228 of NPS EN-3 and are not intended to be exhaustive.

2.3.8.10 When considering the impacts of energy infrastructure, paragraph 3.8.229 states that "Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting HRA sites and/or Marine Conservation Zones (MCZ)".

2.3.8.11 Mitigation referred to in paragraph 3.8.230 states that "At the earliest possible stage, alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology".

2.3.8.12 Further, paragraph 3.8.231 states that "Only once all feasible alternatives and mitigation measures have been employed, should Applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity".

2.3.9 National Policy Statement for Electricity Networks Infrastructure (EN-5)

2.3.9.1 NPS EN-5 is the NPS which provides detail of electricity networks (including grid connections for wind farms) and sets out assessment principles in relation to the consideration of applications relating to electricity networks and, in terms of offshore wind, this relates to substations, convertor stations and other kinds of electricity infrastructure such as underground and sub-sea cables.

2.3.9.2 EN-5 is of limited relevance to Morgan Generation Assets given that the transmission asssets, (including marine export cable, cable landfall, terrestrial cable works and onshore substations) do not form part of this DCO but instead are subject to consent under the Morgan and Morecambe Transmission Assets DCO process. This provides for a coordinated approach to consenting and development to be taken between Morgan Offshore Wind Project and Morecambe Offshore Windfarm. Both projects have been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR), which is designed to improve the coordination of offshore wind generation connections and transmission networks. The output of this process concluded that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively on a coordinated grid connection at Penwortham in Lancashire.

2.3.9.3 This collaboration aligns with EN-5 as it provides a co-ordinated approach to connections to the onshore transmission network, having consideration of strategic network design. The proposal of a radial offshore transmission option to two windfarms, aligns with section 2.13 and alleviates the concern that connecting individually to the grid on a radial (point-to-point) basis, would present a major barrier to realising the UK Government's ambition of building 50GW in offshore wind capacity by 2030.

2.3.9.4 Despite this, a matter of relevance to this application is discussed under NPS EN-5 2.9.61 – 2.9.64, which advises applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of Sulphur Hexafluoride (SF6) reliant assets. Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost. In particular, an accounting of the cost differential between the SF6-reliant asset and the appropriate SF6-free alternative should be provided. Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors. In the particular case of Morgan Generation Assets, the Applicant is seeking to use alternatives to SF6 where possible.

2.3.10 National Planning Policy Framework

2.3.10.1 The National Planning Policy Framework (NPPF) was published in 2012 and updated in 2018, 2019, 2021 and 2023 by the Department for Levelling Up, Housing and Communities (DLUHC)).

2.3.10.2 Paragraph 5 states that the NPPF does not contain specific policies for NSIPs. These are to be determined in accordance with the decision-making framework set out in the 2008 Act and relevant NPSs for nationally significant infrastructure, as well as any other matters that are considered both important and relevant (which may include the

NPPF). National Policy Statements (EN-1, EN-3 and EN-5) and Marine Policy have been considered throughout this statement, as the two applicable policy documents for the Morgan Generation Assets to be evaluated against. This is due to the Morgan Generation Assets being solely offshore.

2.3.11 Marine policy

UK Marine Policy Statement 2011

2.3.11.1 The UK-wide MPS was published in March 2011, under the MCAA, in order to provide a framework for marine spatial planning, specifically for the preparation of Marine Plans and taking decisions that affect the marine environment (Department for Environment Food and Rural Affairs (Defra, 2011). The MMO has taken a regional approach to the development of marine plans in English waters.

2.3.11.2 The MCAA requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the MPS and the relevant Marine Plans.

2.3.11.3 The MPS provides that the following issues should be taken into account by decision makers when examining and determining applications for energy infrastructure:

- The national level of need for energy infrastructure, as set out in NPS EN-1
- The positive wider environmental, societal and economic benefits of low carbon electricity generation and carbon capture and storage as key technologies for reducing carbon dioxide emissions
- The potential impact of inward investment in offshore wind, wave, tidal stream and tidal range energy related manufacturing and deployment activity; as well as the impact of associated employment opportunities on the regeneration of local and national economies. All of these activities support the objective of developing the UK's low carbon manufacturing capability (MPS, paragraph 3.3.4).

2.3.11.4 The MPS does acknowledge that renewable energy developments can potentially have adverse impacts on fish, mammals and birds and that further research is required to better understand potential impacts, however it goes on to state that:

2.3.11.5 ‘The UK has some of the best wind resources in the world and offshore wind will play an important and growing part in meeting our renewable energy and carbon emission targets and improving energy security by 2020, and afterwards towards 2050’ (MPS, paragraph 3.3.19).

2.3.11.6 In addition, the MPS states that offshore wind:

2.3.11.7 ‘…..has the potential to have the biggest impact in the medium-term on security of energy supply and carbon emission reductions through its commercial scale output’ (MPS, paragraph 3.3.19).

2.3.11.8 Relevant policies of the UK Marine Policy Statement 2011 for the Morgan Generation Assets project are included and addressed in each of the relevant topic chapters of the submitted Environmental Statement and an assessment of compliance with these is presented within this Planning Statement.

North West Inshore and North West Offshore Marine Plan 2021

2.3.11.9 The Morgan Generation Assets is located within English offshore waters covered by the North West Offshore Marine Plan area. The North West Inshore and North West

Offshore Marine Plan was published by the MMO in June 2021 (His Majesty's (HM) Government, 2021a) and introduces a strategic approach to marine planning within the marine plan area. It is intended to inform decision-making by marine users and regulators on where, when or how activities may take place within the marine plan area. Relevant policies for the Morgan Generation Assets project are included and addressed in each of the relevant topic chapters of the submitted Environmental Statement and an assessment of compliance with these is presented within this Planning Statement.

2.4 Need for the project

2.4.1 Overview

2.4.1.1 The NPSs establish the policy need for new renewable energy generation. The key drivers underpinning the need for renewable energy within the UK, and why the government believes there is an urgent need for new electricity NSIPs are discussed throughout this section. The NPSs in particular are considered further in section 1.5 of this planning statement.

2.4.2 The need for new nationally significant energy infrastructure projects and offshore wind projects

2.4.2.1 Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 3.1.1 and 3.3.63).

2.4.2.2 When determining applications for offshore wind this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and subsequently substantial weight should be given to the contribution these projects would make towards satisfying this need. However, NPS EN-1 (paragraph 3.2.8) also confirms that when determining applications for national infrastructure, the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS.

2.4.2.3 Whilst there is a general presumption in favour of consenting NSIPs based on the Government's assessment of the need for electricity generating capacity as set out in paragraphs 3.3.57 – 3.3.63 of the NPS, the NPSs designated in January 2024 now include a strengthened presumption specifically in relation to critical national priority (CNP) infrastructure.

2.4.2.4 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirms that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

2.4.2.5 Paragraph 4.2.5 of NPS EN-1 confirms that offshore wind constitutes low carbon CNP infrastructure.

2.4.2.6 Therefore, as an offshore wind generation project, the Morgan Generation Asset is considered by NPS EN-1 to be low carbon CNP infrastructure.

2.4.2.7 The strengthened presumptions in favour of CNP infrastructure set out in paragraph 4.2.16 of EN1 states that se in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."

2.4.2.8 Paragraph 4.6.16 then confirms that the starting point for decision making is that CNP infrastructure is to be treated as if it has met any tests which are set out within the

NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances.

2.4.2.9 Similarly, in terms of any HRA or MCZ residual impacts, paragraphs 4.2.18 – 4.2.22 confirm that the starting point is that energy security and decarbonising the power section to combat climate change are capable of amounting to imperative reasons of overriding public interest (IROPI) with the benefit to the public being capable of outweighing the risk of environmental damage and NPS EN-1 imposes no limit on the number of CNP infrastructure projects that can be consented (Paragraph 4.2.21)

2.4.2.10 In terms of the requirements for applicants for CNP infrastructure, paragraphs 4.2.10 – 4.2.12 confirms that they must continue to show how their application meets the requirements of the NPSs applying the mitigation hierarchy, as well as any other legal and regulatory requirements. That they should also seek the advice of the appropriate SNCB or other relevant statutory body and demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated, setting out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success.

2.4.2.11 The exceptions to this presumption of consent are set out in NPS EN-1 paragraph 4.1.7. Whilst the paragraph reiterates that the need case will outweigh the residual effects in all but the most exceptional cases, it also states that those exceptions include residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero and to unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.

2.4.2.12 None of the above exceptions apply to the Morgan Generation Assets and it has evolved to ensure that the mitigation hierarchy has been met in relation to potential effects identified throughout the application preparation process such that there are no effects of the Morgan Generation Assets that should affect the strong presumption in favour of granting consent.

2.4.2.13 Part 3 of NPS EN-3 also confirms that the Government has concluded that there is a critical national priority for the provision of nationally significant new offshore wind development and supporting onshore and offshore network infrastructure, which the development of Morgan Generation Assets supports.

2.4.3 The need to reduce greenhouse gas emissions

2.4.3.1 The UK is a signatory to the Kyoto protocol, which committed industrialised countries and economies to limit and reduce GHG emissions in accordance with agreed individual targets. The protocol came into effect in 2005 and its commitments were transposed into UK law by the Climate Act. This placed a duty on the UK to ensure that the net UK carbon account for the year 2050 is 80% lower than the 1990 baseline. This was revised to a 'net zero target' of GHG emissions for the year 2050 to be 100% lower than the 1990 level by the Climate Act (2050 Target Amendment) Order 2019.

2.4.3.2 In December 2015, 195 countries adopted the first ever universal, legally binding global climate deal at the Paris climate conference (COP21). The Paris Agreement (2015) sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to below 2°C above pre-industrial levels, and to pursue efforts to limit global warming to 1.5°C. In November 2021, the UN Climate Change Conference (COP26) was held in Glasgow. The Glasgow Climate Pact, agreed by all parties, ensures the 1.5°C warming limit remains achievable but

only with accelerated action on climate. Guidelines for how the Paris Agreement will be delivered were also completed at COP26.

2.4.3.3 Power sector emissions fell 17% in 2015 to 50% below 1990 levels. This follows an average annual decrease of 5% in the years between 2009 and 2014. This reduction is largely due to an increase in renewable and nuclear generation, equating to almost half of the UK's electricity demand in 2015 (Climate Change Committee (CCC 2016)). In order to achieve necessary ongoing reductions in emissions, the UK CCC recommended that the UK government should set out an intention to support 1 to 2 GW of offshore wind per year, provided costs continue to fall, with a view to phasing out subsidies in the 2020s. By facilitating the expansion of renewable energy supply, the Morgan Generation Assets would contribute towards meeting these obligations and assist the UK Government target of achieving a fully decarbonised power system by 2035 and the UKs aim to become net zero by 2050.

2.4.4 Future increases in electricity demand

2.4.4.1 NPS EN-1 (paragraph 2.2.1) outlines the need for the UK to meet its legally binding 2050 emissions reductions targets.

2.4.4.2 Even with major improvements in overall energy efficiency, the Government expects that demand for electricity is likely to increase, as significant sectors of energy demand switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption (measured in terawatt hours (TWh) over a year) could double by 2050.

2.4.4.3 In 2020, the CCC identified that as demand grows, more capacity will be needed and its balanced scenario would necessitate deploying 3 GW a year of wind, to reach 430 TWh by 2050, and reach the target 40 GW of de-rated electricity capacity by 2030, and 65 to 125 GW by 2050.

2.4.4.4 NPS EN-1 concludes that in order to secure energy supplies that enable Government obligations for 2050 to be met, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible. The Morgan Generation Assets would contribute significantly towards meeting these obligations.

2.4.5 The role of offshore wind and national policy support

2.4.5.1 The role of offshore wind is key in achieving the UK Government renewable energy targets for 2030 and 2050. The offshore wind industry presents an opportunity to utilise and further develop the UK's maritime engineering skills as other industries decline (such as shipbuilding and North Sea oil) in order to secure supply chain and other employment opportunities in the UK. The importance of maximising opportunities for the involvement of local businesses and communities in offshore wind has been highlighted as a key success factor for the sector in the UK (TCE, 2014).

2.4.5.2 An ambition set out in the UK Government's Energy White Paper, 'Powering our Net Zero Future' 2021, the Net Zero Strategy: Build Back Greener (HM Government, 2021) and the British Energy Security Strategy (HM Government 2022) is to have 40 GW of offshore wind by 2030, a fourfold increase on today's installed capacity. This aligns with the Prime Minister's Ten Point Plan for a Green Industrial Revolution (HM Government, 2020). In addition, the UK Government would generate more power than all our homes use today, back new innovations to make the most of this proven technology and invest to bring new jobs and growth to our ports and coastal regions.

2.5 Policy accordance

2.5.1 Accordance with National Policy Statements and other policy

2.5.1.1 This section provides an assessment of how the Morgan Generation Assets accords with EN1, EN3 and any other relevant policy which was considered in detail in sections 1.3 to 1.4 of this statement.

2.5.1.2 With regards to the NPSs, updates to the original 2011 versions were published in November 2023 and were formally designated on 17 January 2024. Therefore, the application for consent and this Planning Statement has regard to the designated NPSs.

2.5.1.3 The SoS must start with a presumption in favour of granting consent for the Morgan Generation Assets and the presumption will continue to apply unless specific policies and requirements relevant to the application cannot be met.

2.5.1.4 The individual topic chapters of the Environmental Statement submitted with this DCO application are considered below, having regard to the provisions the relevant NPSs and how their assessment of the Morgan Generation Assets has accorded with them. As mentioned in section 1.3 of this Planning Statement, further detail on accordance with the NPSs is provided in the NPS Tracker (Appendix A).

2.5.1.5 Each Environmental Statement topic is considered using the following structure:

- National Policy Statements – outlines the requirements of the relevant NPSs for the topic and how Morgan Generation Assets Project has addressed these requirements
- Other policy considerations – where other relevant planning policy requirements have been identified beyond the NPSs, consideration of how the Morgan Generation Assets has addressed those requirements in relation to each topic is set out in this section
- Summary – Summarises the potential effects of the Morgan Generation Assets for each topic and provides a conclusion as to the topic's compliance with the NPSs and other policy considerations.

2.5.1.6 In terms of general Environmental Effects/Considerations Section 4.3 of NPS EN-1 sets out the approach that applicants should take. The Morgan Generation Assets has complied with the requirements of this section of NPS EN-1 as set out below.

2.5.1.7 As the Morgan Generation Assets is subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the application is accompanied by an Environmental Statement as required by NPS EN-1 paragraph 4.3.1.

2.5.1.8 In accordance with NPS EN-1 paragraph 4.3.10 the Environmental Statement provides information proportionate to the scale of the Morgan Generation Assets that is sufficient to meet the requirements of the EIA.

2.5.1.9 As set out in section 1.2.4 of this Planning Statement, and in accordance with NPS EN-1 paragraphs 4.3.11 and 4.3.12, which recognise that some details of a proposal may not be finalised, Morgan Generation Assets has adopted an MDS based on Rochdale Envelope principles that ensures that it is assessed on the basis of a worst-case scenario in order to provide flexibility, whilst ensuring all potentially significant effects are assessed.

2.5.1.10 In order to avoid repetition in the topic sections below, it is also confirmed that all topics have assessed all phases of the Morgan Generation Assets (construction, operations and maintenance and decommissioning) and they all assess the potential cumulative effects of the project in conjunction with other projects as well as potential transboundary effects.

2.5.1.11 Additionally, it is noted that a number of NPS EN-1 topic-specific sections refer to the 25 Year Environment Plan. The UK government set out its vision for a quarter of-a-century action to help the natural world regain and retain good health and a commitment to review the plan every five years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023, which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity is set out in the Environmental Improvement Plan 2023, the aim of which is to halt overall biodiversity loss by 2030 and then reverse loss by 2042 in the context of the challenge presented by climate change.

2.5.1.12 The Environment Act 2021 sets out a number of targets and those that are relevant to the Morgan Generation Assets are considered in Table J2.1.1 of the NPS Tracker (Appendix A) which forms an appendix to this Planning Statement. Table J2.1.1 provides a summary of the likely effects that the Morgan Generation Assets may have on those targets.

2.6 Physical processes

2.6.1.1 This topic is assessed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.2 Table 2.1below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to physical processes. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Asset has addressed the requirements of the relevant NPS paragraphs.

Table 2.1: Summary of National Policy Statements relevant to the physical processes assessment.

National Policy Statements – Paragraphs relevant to the Physical Processes assessment
NPS EN-1
Coastal Change – Applicant Assessment – Paragraph 5.6.10 - 5.6.14
NPS EN-3
Offshore Wind – Physical Environment - Paragraphs 3.8.126 - 3.8.128
Offshore Wind – Subtidal habitats and species – Paragraph 3.8.163
Offshore Wind – Subtidal habitats and species – Paragraph 3.8.166
Offshore Wind – other offshore infrastructure and activities – Paragraph 3.8.213 = 3.8.215
Offshore Wind – Other offshore infrastructure and activities – Paragraph 3.8.216
Offshore Wind - Physical Environment – Paragraph 3.8.239 - 3.8.240
Offshore Wind – Subtidal habitats and species – Paragraph 3.8.335
Offshore Wind – Biodiversity and ecological conservation – Paragraph 3.8.323

2.6.1.3 The different procedures associated with the construction, operations and maintenance and decommissioning of the Morgan Generation Assets are considered within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

2.6.1.4 As required by **NPS EN-1 paragraph 5.6.10** an assessment of sediment dynamics was undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime. Refer to Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1).

2.6.1.5 In accordance with **NPS EN-1 paragraph 5.6.11,** baseline and post-construction physical processes were compared alongside extreme storm conditions to consider the wave climate detailed in Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1), whilst climate change is discussed in section 1.5.3 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). The modelling study confirmed that there are no impacts on the coast, tidal rivers or estuaries; this was scoped out of the assessment.

2.6.1.6 Climate change and the future baseline scenario with respect to the proposed development is discussed in section 1.5.3 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.7 A Cumulative Effects Assessment (CEA) has been undertaken and is outlined in section 1.11 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.8 The effects of the proposed project on the range of offshore receptors are assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2), Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). Coastal recreation is addressed in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

2.6.1.9 As required by NPS **EN-1 paragraph 5.6.12**, the provisions for dredging activities are considered within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3). Best practice techniques will be employed to ensure sediment mobilisation is minimised.

2.6.1.10 Consultation was undertaken with the appropriate statutory bodies under the evidence plan through Expert Working Groups (EWG) as detailed in section 1.3 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.11 Assessment of sediment dynamics undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime, as presented in section 1.5.1 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). Refer to Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1) for further detailed information.

2.6.1.12 Predicted changes to the tidal current, wave climate, littoral currents and sediment transport are quantified in Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1).

2.6.1.13 The requirements of **NPS EN-1 paragraph 5.6.13** have been met as designated sites and features of importance within and surrounding the physical processes study area have been identified, as evidenced in section 1.5.2 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). Further information is also provided in the ISAA (Document reference E1.1 – E1.3) and MCZ Screening Assessment (Document reference E2).

2.6.1.14 In addition, potential impacts have also been identified and the significance of the effects on physical processes receptors has been assessed in section 1.9 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). and the integrity of special features are also assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) and Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.6.1.15 In accordance with **NPS EN-3 paragraphs 2.8.112 to 2.8.114** an assessment of the significance of effects during installation of foundations and site preparation (construction phase) on physical processes receptors is detailed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) and an assessment of sediment dynamics undertaken using the hydrodynamic and spectral wave modelling, together with an understanding of the sediment regime is set out in Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1). Scour protection is included within the assessment as defined by the project description outlined in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

2.6.1.16 In accordance with **NPS EN-3 paragraph 2.8.123** mitigation measures have been considered during consultation and included within the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). This includes scour/cable protection techniques and cable burial techniques as set out in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.17 **NPS EN-3 paragraph 2.8.126** has been addressed in the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) with the impact of increased suspended sediment loads and subsequent deposition being considered. Hydrodynamic modelling has been undertaken for the physical processes assessment (refer to Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1)).

2.6.1.18 It is considered that changes to bathymetry due to depressions left by jack-up vessels will be very limited and these are therefore scoped out of the assessment with justification presented in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.19 With regard to the requirements of **NPS EN-3 paragraphs 2.8.197 to 2.8.200**, the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) includes the impact of increased suspended sediment loads and subsequent deposition. Legislative requirements for offshore wind farms are considered within Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) and the Cumulative Effects Assessment (CEA) was carried out in accordance with these procedures as detailed in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). Marine plans have been reviewed and assessed to consider which activities may be more affected by the Morgan Generation Assets.

2.6.1.20 Key issues have been raised and discussed during consultation activities and engagement specific to physical processes. A summary of the key issues and responses is provided in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.21 As required by **NPS EN-3 2.8.215**, the physical processes assessment has considered all relevant research and current guidance on avoidance, reduction and mitigation of potential effects. Installation and decommissioning methods have been designed to minimise physical effects as set out in section 1.9 in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

2.6.1.22 In accordance with **NPS EN-3 paragraphs 2.8.224 to 2.8.225**, measures adopted as part of the Morgan Generation Assets, including scour/cable protection techniques and cable burial techniques, have been considered during consultation and included within the assessment in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). Any relevant mitigation measure is included within the Mitigation and Monitoring Schedule (Document Reference J6).

Summary of Effects

2.6.1.23 Information on physical processes within the physical processes study area was collected through detailed desktop review of existing studies and datasets and supported by numerical modelling, and the assessments were undertaken having full regard to the relevant sections of NPSs EN-1 and EN-3 as set out above.

2.6.1.24 Whilst those assessments have identified a number of potential effects on physical processes receptors due to the Morgan Generation Assets, all of these are considered to be negligible.

2.6.1.25 Increased suspended sediment concentrations may arise due to seabed preparation involving sandwave clearance, the installation of the wind turbines and OSP foundations, the installation and/or maintenance of cables and associated decommissioning activities. This impact is relevant to the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets and may cause indirect impacts to receptors. During both the construction phase and operations and maintenance phases the impact is predicted to be of local spatial extent, short term duration, intermittent and high reversibility and the magnitude is therefore, considered to be **negligible**. During the operations and maintenance phase. Following decommissioning, increases in suspended sediments and potential impact on the physical features would be of lesser magnitude than both the construction phase and the operations and maintenance phase with scour and cable protection remaining *in situ*.

2.6.1.26 The presence of infrastructure may lead to changes to the tidal regime during the operations and maintenance phase of the Morgan Generation Assets. This impact is also relevant to the construction phase and following decommissioning associated with residual infrastructure. Overall, the impact is predicted to be of local spatial extent, long term duration, continuous and high reversibility. It is predicted that the impact will affect the receptor indirectly. The magnitude is therefore, considered to be **negligible**.

2.6.1.27 Introducing infrastructure may lead to changes to the wave regime principally during the operations and maintenance phase of the Morgan Generation Assets. Also, relevant to a lesser degree is the construction phase and decommissioning associated with residual infrastructure. Overall, the impact is predicted to be of local spatial extent, long term duration, continuous and high reversibility. It is predicted that the impact will affect the receptor indirectly. The magnitude is therefore, considered to be **negligible**.

2.6.1.28 During the operations and maintenance phase the presence of infrastructure may alter sediment transport and sediment transport pathways leading to changes in the Morgan Generation Assets physical processes study area and associated potential impacts to physical features and bathymetry. The construction and decommissioning phases will be impacted to a lesser degree. Overall, the impact is predicted to be of local spatial extent, long term duration, continuous and high reversibility. It is predicted that the impact will affect the receptor indirectly. The magnitude is therefore, considered to be **negligible**.

2.6.1.29 Within the physical processes study area most of the water column remains thoroughly mixed due to the occurrence of sufficiently intense tidal mixing throughout the year. There are short periods when marginal stratification occurs for example during hot, calm conditions however these are easily disrupted by storms or spring tides. Localised changes in tidal flow around infrastructure would be beneficial in providing additional mixing in the immediate vicinity. It has been noted that stratification of the water column can occur in estuaries and specifically in Morecambe Bay, but the modelling studies undertaken demonstrated that potential changes in tidal currents and wave climate do not extend into these areas located beyond the physical processes study area therefore there will be no impact on thermal stratification.

2.6.1.30 A cumulative effect assessment was undertaken and effects upon physical processes receptors described. The CEA takes into account the impact associated with the Morgan Generation Assets together with the Morgan and Morecambe Offshore Wind Farms Transmission Assets, the Morecambe Offshore Windfarm Generation Assets, and other projects and plans.

2.6.1.31 No potential transboundary impacts have been identified in relation to effects of the Morgan Generation Assets.

Policy Compliance

2.6.1.32 With regard to physical processes, the Morgan Generation Assets has been assessed as required by the relevant NPSs and the WNMP.

2.6.1.33 Those assessments conclude that there will only be negligible effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases.

2.6.1.34 Accordingly, it has been demonstrated that the Morgan Generation Assets accords with the requirements of NPS EN-1 and EN-3 and with Policies NW-CAB-1, NW-MPA-1, NW-MPA4, NW-BIO-1 and NW-CE-1 of the ENV-01, ENV-02 and SOC-09 of the North West Inshore and North West Offshore Coast Marine Plans.

2.6.1.35 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the negligible potential effects on physical processes.

2.7 Benthic subtidal ecology

2.7.1.1 This topic is assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.2 Table 2.2below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to benthic subtidal ecology. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.2: Summary of National Policy Statements relevant to the Benthic Subtidal Ecology Assessment

National Policy Statements – Paragraphs relevant to the Benthic Subtidal Ecology Assessment
NPS EN-1
Environmental Effects/Considerations - Applicant Assessment - Paragraph 4.3.10
Biodiversity and geological Conservation – Applicant Assessment - Paragraph 5.4.17
Biodiversity and geological Conservation – Applicant Assessment - Paragraph 5.4.19
Biodiversity and geological Conservation – Mitigation - Paragraph 5.4.35
Biodiversity and geological Conservation – Secretary of State Decision Making - Paragraph 5.4.42 and 5.4.43
Biodiversity and geological Conservation – Secretary of State Decision Making - Paragraph 5.4.48
Coastal Change – Applicant Assessment - Paragraph 5.6.13
NPS EN-3
Offshore Wind – Offshore wind environmental standards - Paragraph 2.8.90 – 2.8.92
Offshore Wind – Subtidal and coastal habitats and species - Paragraph 2.8.119
Offshore Wind - Subtidal habitats and species- Paragraph 2.8.126
Offshore Wind – Subtidal and coastal habitats and species - Paragraph 2.8.231

2.7.1.3 The EIA Scoping process has enabled the Morgan Generation Assets to deliver environmental information proportionate to the proposed development as required by NPS EN-1 paragraph 4.3.10. This is demonstrated in regard to the justification of the topics scoped out (Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) as this demonstrates a proportionate approach.

2.7.1.4 In accordance with NPS EN-1 paragraph 5.4.17 and 5.4.48, all designated sites with relevant benthic ecology features which have the potential to be impacted by the Morgan Generation Assets as well as protected habitats and species within the benthic subtidal ecology study area have been identified and considered in the assessment within Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of the Morgan Generation Assets as set out in section 2.8 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.5 In accordance with NPS EN-1 paragraph 5.6.13, MCZs have been taken account of through the identification of designated sites within the Morgan benthic subtidal area (Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement, Document Reference F2.2) As a result of this process two MCZs have been considered in this assessment, and the relevant MCZs are identified in section 2.5.6 and assessed throughout section 2.8.2 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). The impact of the Morgan Generation Assets on all habitats, species and sites protected under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) is assessed in the HRA Stage 1 Screening Report (Document Reference E1.1) and HRA

Stage 2 Information to support the Appropriate Assessment (ISAA) (Document References E1.1, E1.2 and E1.3).

2.7.1.6 As required by NPS EN-1 paragraphs 5.4.19, 5.4.35, 5.4.42 and 5.4.43, the MDS represents the parameters that make up the realistic worst-case scenario. The worst case that could potentially be built out is selected on a topic-by-topic and impact-by-impact basis and subsequently assessed. This is presented in section 2.7.1 and Table 2.26 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.7 Best practice during construction and maintenance will be set out in the Construction Method Statement and the Environmental Management Plan (Table 2.16).

2.7.1.8 Following the completion of most activities sedimentary habitats will recover naturally and measures have been adopted for the Morgan Generation Assets to avoid direct impacts on sensitive habitats where recovery would be limited (section 2.8 Volume 2, Chapter 2 Benthic subtidal ecology in the Environmental Statement).

2.7.1.9 The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of the Morgan Generation Assets and seek to avoid or reduce the magnitude of impacts in line with the mitigation hierarchy as set out in section 2.8 Volume 2, Chapter 2 Benthic subtidal ecology in the ES with all such measures set out in the Mitigation and Monitoring Schedule (Document Reference J6).

2.7.1.10 The Applicant is aware of the requirements in NPS EN-3 paragraphs 2.8.90-92 to consider the relevant Offshore Wind Environmental Standards (OWES) to support developers to take a more consistent approach to avoiding, reducing, and mitigating the impacts of an offshore wind farms and/or offshore transmission infrastructure and has taken any existing guidance into account.

2.7.1.11 In accordance with NPS EN-3 paragraph 2.8.126 the impact of suspended sediments, long term habitat loss, EMF from subsea cables, the introduction and spread of Invasive Non-Native Species (INNS) and temporary habitat disturbance from cable installation and maintenance as well as anchors and vessel legs (i.e. jack-up legs) has been quantified and presented in the MDS Table 2.15 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). The effect of these impacts on the habitats within the Morgan Array Area has then been assessed throughout section 2.8 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.12 The predicted rates of recovery in the subtidal zone from temporary effects has been considered in the sensitivity of the subtidal biotopes and then used to determine the final significance of an impact as set out in section 2.9 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.13 The Morgan Generation Assets alone assessment MDS includes the impact of cable crossings in Table 2.26 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).

2.7.1.14 Cumulative effects have been quantified and their significance assessed in section 2.10 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2), including the impact of cables from other projects within the benthic subtidal ecology CEA study area in accordance with NPS EN-3 paragraph 2.8.231.

Other Policy Considerations

2.7.1.15 Table 2.3 below lists other national policy considerations relevant to the Benthic Subtidal Ecology Assessment.

Table 2.3: Summary of Other National Policy Considerations relevant to the Benthic Subtidal Ecology Assessment

North West Inshore and North West Offshore Coast Marine Plan provisions
Marine Protected Areas - Policy NW-MPA-1
Biodiversity - Policy NW-BIO-1
Biodiversity - Policy NW-BIO-2
Biodiversity - Policy NW-BIO-3
Invasive non-native species - Policy NW-INNS-1
Cumulative Effects - Policy NW-CE-1

2.7.1.16 With regards to NWCMP **Policy NW-MPA-1,** Designated sites within the Morgan benthic subtidal ecology study area have been identified in section 2.5.6 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). This was done to ensure all habitats, features and species of conservation importance were considered, where relevant.

2.7.1.17 Section 2.8 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) sets out that the Morgan Generation Assets will aim to conserve habitat through a number of measures adopted to reduce the impact of the Morgan Generation Assets and Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) demonstrates mitigation is considered where the significance of an impact is moderate or major to reduce the significance of the impact to negligible or minor. This assessment is undertaken for each impact. Section 2.9 Volume 2, Chapter 2 Benthic subtidal ecology in the ES considers the magnitude, sensitivity and significance of the impacts associated with the Morgan Generation Assets on the relevant subtidal important ecological features (IEF). Additionally considering mitigation where impacts were found to be significant. As a result, the Morgan Generation Assets seeks to conserve the function and services provided by coastal habitats in accordance with NWCMP **Policies NW-BIO-1, NW-BIO-2 and NW-BIO-3**.

2.7.1.18 The implementation of an Environmental Management Plan as part of the measures adopted by the Morgan Generation Assets (set out within section 2.8 and Table 2.16 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2)) will manage and reduce the risk of introduction or spread of invasive non-native species which will be in compliance with NWCMP **Policy NW-INNS-1.**

2.7.1.19 Cumulative effects have been quantified and their significance assessed in section 2.11 of Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). This section includes the consideration of mitigation

where the significance is found to be moderate or major in accordance with NWCMP **Policy NW-CE-1**.

Summary of Effects

2.7.1.20 Benthic ecology refers to the communities of animals and plants which live on or in the seabed and the relationships that they have with each other and with the physical environment. The subtidal benthic ecology of the Morgan Generation Assets was characterised via a series of site-specific surveys using grab sampling, underwater video and eDNA.

2.7.1.21 These surveys indicated that seabed within the Morgan benthic subtidal ecology study area supports a variety of plant and animal communities that are typical of this area. Key habitats recorded included mixed sediment supporting a range of species such as catworms, sea urchins and amphipods, as well as course sediment habitats characterised by marine worms. Sandy mud and fine sand habitats were also identified in this area and were characterised by brittlestars, bristle worms, sea urchins and bivalves. Overlying these sediment-based communities were plant and animal assemblages comprised of larger, more mobile species, such as hermit crab, common starfish and brittlestars.

2.7.1.22 A number of potential impacts on benthic subtidal communities/species, associated with the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets, were identified. These included increased suspended sediment concentrations and deposition, temporary habitat disturbance/loss, potential disturbance/remobilisation of sediment-bound contaminants, long-term habitat loss, introduction of artificial structures, increased risk of introduction or spread of Invasive Non-Native Species (INNS), removal of hard substrate, changes in physical processes, electromagnetic fields and heat from subsea cabling. With the measures adopted as part of the project in place, these potential impacts are predicted to result in effects of either negligible or minor adverse significance.

2.7.1.23 Temporary habitat loss/disturbance and long-term habitat loss/habitat alteration were deemed to be of minor adverse significance (not significant in EIA terms) to benthic receptors, as the proportion of habitat disturbed and/or lost is predicted to be small in the context of available habitats in the Morgan Array Area and wider area.

2.7.1.24 Temporary increases in suspended sediment concentrations and associated deposition were also deemed to be of minor adverse significance (not significant in EIA terms) due to the short-term nature of the impact and as the seabed plants and animals in this area have a low sensitivity to this type of impact.

2.7.1.25 Cumulative effects from projects and activities such as aggregate extraction and other offshore renewable developments were assessed and predicted to result in effects of negligible or minor adverse significance (not significant in EIA terms) upon subtidal benthic communities within a 50 km buffer of the Morgan Generation Assets. There will be moderate adverse effects from temporary habitat disturbance/loss, however, this would only be applicable in the short term and will not extend beyond the construction phase. On the basis that the sediments and associated benthic communities are predicted to recover over time, no mitigation is required to reduce the significance of the effects. The overall significance of the effects in the medium to long term is minor adverse significance, which is not significant in EIA terms.

2.7.1.26 No significant transboundary effects with regard to benthic subtidal ecology from the Morgan Generation Assets on the interests of other States were predicted.

Policy Compliance

2.7.1.27 Information on benthic subtidal ecology within the benthic subtidal ecology study area was collected through desktop and site-specific surveys.

2.7.1.28 The habitats within the Morgan Array Area were found to be widespread and an assessment has been undertaken to understand the impact of the Morgan Generation Assets on these habitats. The impact pathways assessed and the assessment itself was informed by stakeholder engagement.

2.7.1.29 Table 2.36 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement (Document Reference F2.2) presents a summary of the potential direct and indirect impacts, measures adopted as part of the Morgan Generation Assets and residual effects in respect to benthic subtidal ecology. The impacts assessed include temporary habitat loss/disturbance, increased SSC and associated deposition, disturbance/remobilisation of sediment-bound contaminants, long term habitat loss/habitat alteration, introduction of artificial structures, increased risk of introduction and spread of INNS, removal of hard substrates, changes in physical processes, EMF from subsea electrical cabling and heat from subsea electrical cables. For all of the impacts, phases and IEFs it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases.

2.7.1.30 Table 2.37 of Volume 2, Chapter 2: Benthic Ecology of the Environmental Statement (Document Reference F2.2) presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include temporary habitat loss/disturbance, increased SSC and associated deposition, long term habitat loss/habitat alteration, introduction of artificial structures, increased risk of introduction and spread of INNS, removal of hard substrate and changes in physical processes. For all of the cumulative impacts, phases and IEFs it is concluded that there will be no significant effects arising from the Morgan Generation Assets alongside other projects/plans.

2.7.1.31 No significant transboundary impacts have been identified in regard to effects of the Morgan Generation Assets.

2.7.1.32 The construction, operations/maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs or other relevant policy.

2.7.1.33 All matters raised by the NPSs and other policy have been addressed in the Environmental Statement and supporting information.

2.7.1.34 Accordingly, it has been demonstrated that the Morgan Generation Assets accords with the requirements of NPS EN-1 and EN-3 and with Policies NW-MPA-1; NW-BIO-1; NW-BIO-2; NW-BIO-3; NW-INNS-1 and NW-CE-1 of the NWCMP.

2.7.1.35 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on benthic subtidal ecology, which are not significant in EIA terms.

2.8 Fish and shellfish ecology

2.8.1.1 This topic is assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.8.1.2 Table 2.4 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to fish and shellfish ecology. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in further detail how the Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.4: Summary of National Policy Statements relevant to the Fish and Shellfish Ecology Assessment

National Policy Statements – Paragraphs relevant to Fish and Shellfish Ecology Assessment
NPS EN-1
Assessment Principles - Weighing impacts and benefits - Paragraph 4.1.5 – 4.1.6
Assessment Principles – Other documents - Paragraph 4.1.11
Environmental Effects/Considerations - Paragraph 4.3.2 – 4.3.5
Environmental Effects/Considerations - Applicant assessment - Paragraph 4.3.10 and 4.3.12
Marine Considerations – Applicant assessment - Paragraph 4.5.8 – 4.5.9
Climate Change Adaptation and Resilience - Applicant assessment - Paragraph 4.10.5
Pollution Control and Other Environmental Regulatory Regimes – Applicant assessment - Paragraph 4.12.5 – 4.12.7
Biodiversity and Geological Conservation – Applicant assessment - Paragraph 5.4.17 and 5.4.19
Biodiversity and Geological Conservation – Mitigation - Paragraph 5.4.35 and 5.4.36
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.22 – 5.4.23
Coastal Change – Applicant assessment - Paragraph 5.6.10 and 5.6.11
Noise and Vibration – Mitigation - Paragraph 5.12.6
Noise and Vibration – Applicant Assessment - Paragraph 5.12.11 – 5.12.12
NPS EN-3
Consenting Process – Applicant Assessment - Paragraph 2.8.32 – 2.8.33
Offshore Wind – Other offshore infrastructure and activities - Paragraph 2.8.48
Consenting Process – Applicant Assessment - Paragraph 2.8.52 – 2.8.53
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.98
Offshore wind environmental standards – Impacts - Paragraph 2.8.101 – 2.8.106
Offshore Wind - Fish - Paragraph 2.8.150 – 2.8.151
Offshore wind environmental standards – Impacts - Paragraph 2.8.200 – 2.8.203
Offshore Wind – Other offshore infrastructure and activities - Paragraph 2.8.213 – 2.8.216
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.221 – 2.8.223
Offshore Wind – Fish - Paragraph 2.8.245 – 2.8.247
Offshore Wind – Mitigation - Paragraph 2.8.261 – 2.8.262

2.8.1.3 The existing ecology of the fish and shellfish ecology study area is laid out in the baseline environment in section 3.4 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), with all relevant

information used to inform the associated assessment of significant effects on this baseline in section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). This can be used to allow weighing of impacts and benefits in the decision-making process as required by NPS EN-1 paragraph 4.1.5.

2.8.1.4 Nearby designated sites, and their associated habitats and species of principal importance (SPI), have been identified in Volume 4: Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1) and are listed in section 1.11, with the identified important ecological features (IEFs) listed in section 1.12.3. These can be used in accounting for national, regional, and local impacts of these projects in compliance with NPS EN-1 paragraph 4.1.6.

2.8.1.5 All guidance and policy frameworks in relation to fish and shellfish ecology have been identified in section 3.2 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and complied with throughout in line with NPS EN-1 paragraph 4.1.11.

2.8.1.6 The Morgan Generation Assets complies with NPS EN-1 paragraph 4.3.2 – 4.3.5 as the impacts on fish and shellfish ecology have been assessed and included in section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), with all other impacts assessed throughout the chapter.

2.8.1.7 The impacts on fish and shellfish ecology have been assessed in section 3.9, with all other impacts assessed throughout the chapters, with mitigation measures identified in section 3.7.1.2. of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). The assessment of significant effects in section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) examines the impacts of all stages of the project on the environmental factors, and specifically the fish and shellfish ecology receptors, impacted by Morgan Generation Assets.

2.8.1.8 Regarding NPS EN-1 paragraph 4.3.10, Morgan Generation Assets provides in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1); the baseline (section 1.12.2); maximum design scenario (MDS), and assessment of impacts sections examine the scale of potential impacts on the fish and shellfish ecology receptors to comply with this paragraph.

2.8.1.9 In order to comply with NPS EN-1 paragraph 4.3.12, the MDS in section 3.18 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) provides the calculated maximum design scenario impacts on fish and shellfish ecology.

2.8.1.10 All relevant Marine Plans and guidelines are outlined with compliance in to relevant fish and shellfish ecology clauses highlighted in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) to comply with the requirements of NPS EN-1 paragraph 4.5.8 and 4.5.9.

2.8.1.11 NPS EN-1 paragraph 4.10.5 has been complied with as the potential future impact of climate change on fish and shellfish ecology is examined in the future baseline scenario in section 3.5.8 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.8.1.12 Regarding NPS EN-1 paragraph 4.12.5 to 4.12.7, the consultation process is outlined in section 3.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), including any communications with the MMO,

the Environment Agency and NRW, the expert working groups (EWGs), and stakeholder consultation.

2.8.1.13 NPS EN-1 paragraph 5.4.17 and 5.4.19 have been complied with as Morgan Generation Assets set within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), Designated sites are set out in section 3.5.6, with IEFs defined in section 3.5.7based on their conservation, ecological and commercial importance. The impact assessment (section3.9) has been undertaken to consider the potential effects of each project on these IEFs. The conservation of biodiversity interests has been considered directly in the impacts assessment (section 3.9), with designed in mitigation measures (section 3.7.1.2) proposed to reduce potential impacts where possible.

2.8.1.14 The Biodiversity Benefit Statement (document reference J.18) outlines the approach of the Morgan Generation Assets to biodiversity enhancement.

2.8.1.15 Compliance with NPS EN-1 paragraph 5.4.22 and 5.4.23 is achieved with Morgan Generation Assets setting out within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), that diadromous and migratory fish species have been identified as IEFs in section 1.12.3 and are considered in each relevant impact assessment in section 3.9. Vessels will operate under a Code of Conduct within the Outline plan for rafting birds and marine mammals (Document Reference J15) as part of the Environmental management Plan (EMP) and will adhere to an INNS management plan at all times, as detailed in section 3.8 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.8.1.16 In order to comply with NPS EN-1 paragraph 5.4.35 and 5.4.36 the MDS has been developed with project engineers to ensure it is appropriately precautionary and not over-conservative to ensure habitat loss is minimised wherever possible. It represents a realistic scenario without overcompensating for any one activity, in this sense it represents the maximum area required to work in the construction, operation and maintenance and decommissioning phases as set out in Table 3-17 and section 3.7.1 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Any specific mitigation measures to minimise disturbance or damage to habitats and biodiversity have been identified and justified in Table 3-18.

2.8.1.17 Any specific mitigation measures to minimise disturbance or damage to habitats and biodiversity have been identified and justified (Table 3.19). The Biodiversity Benefit Statement (document reference J18) outlines the approach of the Morgan Generation Assets to biodiversity enhancement.

2.8.1.18 With regard to the requirements of NPS EN-1 paragraph 5.4.36 the Applicant intends to produce and implement a Biodiversity Benefits Statement (Document Reference J18) which contains the mechanisms through which the Applicant intends to achieve overall biodiversity benefits and to avoid unnecessary adverse impacts on biodiversity (Document Reference J18),

2.8.1.19 NPS EN-1 paragraph 5.6.10 and 5.6.11 have been complied with, as the potential impacts of suspended sediment concentrations have been modelled, with their impacts on fish and shellfish ecology receptors assessed in section 3.9.4 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.8.1.20 Within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), sources of potential sound impacts have been identified in the MDS in section 3.7.1, and the impacts on fish and shellfish ecology receptors

have been assessed alone in section 3.9.3, and cumulatively in section 3.11.3. Specific mitigation measures, including soft-starts for piling to reduce this impact have been identified and discussed in Table 3.19 to allow compliance with NPS EN-1 paragraph 5.12.6.

2.8.1.21 In accordance with NPS EN-1 paragraph 5.12.11 and 5.12.12, all relevant protected fish and shellfish ecology receptors which could be impacted by sound generated during construction, operation and maintenance and decommissioning activities have been identified in section 3.7.1, and the impacts have been assessed alone in section 3.9.3, and cumulatively in section 3.11.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Mitigation measures to reduce this impact, including soft-starts for piling activities have been identified and discussed in section 3.8. In addition, the project plans to develop an Underwater Sound Management Strategy post-consent and in discussion with stakeholders to support reduction of the impact magnitude associated with underwater sound from piling. An Outline Underwater Sound Management Strategy (document reference J.13) has been submitted as part of the Application.

2.8.1.22 In accordance with NPS EN-3 paragraph 2.6.1 – 2.6.3 the potential impacts from the range of possible foundation design parameters are addressed in the MDS calculation based on the Project Design Envelope (section 3.7.1 and Table 3-17) of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) with the levels of impact on ecologically important fish and shellfish receptors assessed in the assessment of significant effects in section 3.9.

2.8.1.23 In compliance with NPS EN-3 paragraph 2.8.48 relevant developers have been consulted where appropriate. Other stakeholders have been consulted prior to application directly and through the EWG, as outlined in section 3.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), A range of fishers operating within the vicinity of the projects have been consulted on potential impacts and mitigation strategies.

2.8.1.24 NPS EN-3 paragraphs 2.8.52 and 2.8.53 have been complied with as potentially impacted nearby designated sites have been identified in section 3.5.2 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and are assessed throughout this chapter. Mitigation measures to minimise impacts on these designated sites have been identified and discussed in section 3.8.

2.8.1.25 As required by NPS EN-3 paragraph 2.8.98, the existing ecology and biodiversity of the projects fish and shellfish ecology area has been examined in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1) and the baseline assessment in section 3.5 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), any changes expected have been identified in the MDS calculation are set out in section 3.7.1 and Table 3-17, with the levels of impact on fish and shellfish receptors assessed in the assessment of significant effects set out in section 3.9.

2.8.1.26 Important habitats for fish and shellfish, including spawning, nursery and migration routes have been considered in Volume 6, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F6.3.1). Effects on these, including sound and EMF impacts, have been assessed in accordance with NPS EN-3 paragraph 2.8.150 to 2.8.151.

2.8.1.27 In order to address NPS EN-3 paragraphs 2.8.221 to 2.8.223, the potential for future monitoring of any significant effects exists and outlines of these programmes are included in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Whilst paragraph 3.11.9.1 of the chapter states that no specific extra future monitoring of fish and shellfish ecology is currently planned, it recognises that this can be considered further, if relevant, in the future.

2.8.1.28 As required by NPS EN-3 paragraphs 2.8.101 to 2.8.106 both potential maximum design scenario and positive effects on fish and shellfish ecology have been considered in the impact assessment presented in section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), consultation has been undertaken through the Benthic Ecology, Fish and Shellfish Ecology and Physical Processes EWG detailed in section 3.3. The impact assessment in section 3.9 has been undertaken taking into account published post-construction monitoring from offshore wind farms in the UK and overseas and all relevant guidance in section 3.4.1. where required based upon the assessment outcomes to ensure impacts are managed, appropriate post-construction monitoring will be considered for the Morgan Generation Assets.

2.8.1.29 In order to address NPS EN-3 paragraphs 2.8.200 to 2.8.203, relevant stakeholders have been consulted prior to application, together with the EWG, as outlined in section 3.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). A range of fishers operating within the vicinity of the projects have been consulted on potential impacts and mitigation strategies.

2.8.1.30 Mitigation measures to reduce potential impacts on fish and shellfish receptors have been identified in section 3.8 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) in compliance with NPS EN-3 paragraph 2.8.213, 2.8.214 and 2.8.216. In addition, relevant SNCBs and other stakeholders have been consulted prior to application, and the EWG, as outlined in section 3.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). A range of fishers operating within the vicinity of the projects have been consulted on potential impacts and mitigation strategies.

2.8.1.31 Mitigation measures are in place to reduce the significance of impacts where possible, as outlined in section 3.8. Recommendations for any potential future monitoring, where appropriate, are outlined in section 3.11of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). The comply with the requirements of NPS EN-3 paragraph 2.8.221 to 2.8.223.

2.8.1.32 In accordance with NPS EN-3 paragraph 2.8.245 to NPS EN-3 paragraph 2.8.247 mitigation measures have been discussed during consultation and adopted as part of the Environmental Statement, including measures such as scour protection, cable burial where possible, and cable protection.

2.8.1.33 EMF from subsea electrical cabling is assessed within the cumulative effects assessment as outlined in section 3.11.6 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and concludes that the magnitude of cumulative impact is of minor adverse significance, which is not significant in EIA terms.

2.8.1.34 Finally, relevant SNCBs and other stakeholders have been consulted prior to application, and the EWG, as outlined in section 3.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Commercial fisheries stakeholders operating within the vicinity of the projects have

been consulted on the potential impacts and mitigation strategies in accordance with NPS EN-3 paragraph 2.8.261 and 2.8.262.

Other Policy Considerations

2.8.1.35 Table 2.5 below lists other national policy considerations relevant to the Fish and Shellfish Ecology Assessment.

Table 2.5: Summary of Other National Policy Considerations relevant to the Fish and Shellfish Ecology Assessment.

North West Inshore and North West Offshore Coast Marine Plan – Policies relevant to the Fish and Shellfish Ecology Assessment
Fisheries - Policy NW-FISH-3
Marine Protected Areas - Policy NW-MPA-1
Biodiversity - Policy NW-BIO-2
Invasive non-native species - Policy NW-INNS-1
Disturbance - Policy NW-DIST-1
Underwater noise - Policy NW-UWN-2
Cumulative Effects - Policy NW-CE-1
Cross-border co-operation - Policy NW-CBC-1

2.8.1.36 The areas of essential fish habitat potentially impacted have been identified in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1). Within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) the baseline is assessed in section 3.5 and the detail is assessed in section 3.9 in accordance with **NWCMP Policy NW-FISH-3**.

2.8.1.37 Likewise, within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), MPAs with fish and shellfish features have been identified in section 3.5.2. Assessment of impacts on features of these sites, where relevant, are presented in section 3.9, with site specific assessments presented in section 3.4.3, and section 8.10 of Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1) all of which are in accordance with **NWCMP Policy NW-MPA-1**.

2.8.1.38 With regards to **NWCMP Policy NW-BIO-2**, volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1) presents a detailed characterisation of the fish and shellfish ecology in the fish and shellfish ecology study area. This is summarised within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), section 3.5 Assessment of impacts, with consideration of mitigation measures, on these receptors in section 3.9.

2.8.1.39 Similarly, in relation to **NWCMP Policy NW-INNS-1** the prevention of the spread of INNS has been highlighted and considered in section 3.8, dealing with measures adopted as part of the Morgan Generation Assets, with justifications given. These are also considered in the impact assessment in section 3.9 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.8.1.40 **NWCMP Policy NW-DIST-1** is complied with, as demonstrated within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). This has been examined specifically in the impacts of noise during all phases of the development, as detailed in section 3.9.3, as well as the whole of section 3.9, more broadly.

2.8.1.41 The potential impacts of noise resulting from the construction, operation and maintenance, and decommissioning phases have been considered in the noise impact assessment in section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) in compliance with NWCMP **Policy NW-UWN-2.**

2.8.1.42 The potential impacts on other existing, authorised, or reasonably foreseeable proposals have been examined in the CEA in section 3.11 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) as required by NWCMP **Policy NW-CE-1.**

2.8.1.43 Finally, NWCMP **Policy NW-CBC-1** has been complied with as Any potential cross-border impacts have been assessed in the transboundary effects in section 3.12 and inter-related effects in section 3.13 sections 3.11 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

Summary of Effects

2.8.1.44 Fish and shellfish ecology refers to the communities of animals (various commercially and ecologically important fish, crustacean, and mollusc species) which live in the water column or on and in the seabed, including diadromous fish which move between marine and freshwater environments for spawning activity, and the relationships these organisms have with each other and the physical environment.

2.8.1.45 The fish and shellfish ecology of the Morgan Generation Assets was characterised primarily through desktop review due to the large amount of data publicly available, with incorporation of data opportunistically collected from seabed characterisation surveys to help increase the scope of the review and to provide empirical evidence to support characterisation of habitat for substrate-specific species, such as herring and sandeel.

2.8.1.46 The desktop review and site-specific survey results showed the presence of a range of fish, shellfish, and shark and ray species with spawning, nursery or feeding grounds in the vicinity of the Morgan Generation Assets, and in the wider fish and shellfish ecology study area. Species of particular ecological interest included herring, which are a commercially important species with high and low intensity spawning grounds to the west of the Morgan Generation Assets. Sandeel, which are a key prey species for many other marine predators, were also noted as having important populations and spawning grounds in this area.

2.8.1.47 Consultation with stakeholders highlighted the importance of queen and king scallop to commercial fishing activities. Therefore, information from vessel position data and outputs from fisheries stakeholder consultation were incorporated to show the distribution of key fishing and spawning grounds for these species, with overlap with the Morgan Generation Assets noted. Basking shark and angel shark populations were also examined, with the potential for these passing through or occurring within the Morgan Generation Assets highlighted. The likelihood of angel shark being present within the area is low, with the most abundant local populations identified off the coast of North Wales, and only intermittently present. Whilst basking shark are known to

migrate through the wider fish and shellfish ecology study area, none were recorded from the digital aerial surveys commissioned across the Morgan Generation Assets.

2.8.1.48 A number of potential impacts on fish and shellfish species associated with the construction, operation/maintenance and decommissioning phases of the Morgan Generation Assets were identified. These included:

- Temporary habitat loss or disturbance
- Underwater sound impacts
- Increased suspended sediment concentrations and associated sediment deposition
- Long term habitat loss
- Electromagnetic fields from subsea electrical cabling
- Introduction of artificial structures and colonisation of structures
- Disturbance/remobilisation of sediment-bound contaminants
- Injury to basking shark due to increased risk of collision with vessels.

2.8.1.49 Temporary and long-term habitat loss/disturbance were both deemed to be of minor adverse significance (not significant in EIA terms) to fish and shellfish receptors, as the proportion of habitat lost within the Morgan Generation Assets was predicted to be small in the context of other similar available habitats in the wider fish and shellfish ecology study area.

2.8.1.50 The impact of underwater sound from pile driving was assessed to potentially cause a significant impact to herring spawning at the mapped spawning grounds off the coast of the Isle of Man, due to the location of these grounds in relation to the Morgan Generation Assets and the sensitivity of this species to underwater sound impacts. The project has committed to the development of an Underwater Sound Management Strategy to reduce noise levels associated with significant impacts to environmentally acceptable levels. The Outline Underwater Sound Management Strategy (Document Reference J13) will present a review of relevant mitigation measures (such as noise abatement systems, temporal and spatial restrictions) to reduce the magnitude for the project alone, which will also support reducing the magnitude cumulatively, thereby reducing the overall impact significance to minor adverse. In this case, further mitigation measures would be applied to reduce sound impacts to a level whereby a magnitude of low or negligible for herring could be concluded. These mitigation measures would also result in a reduction of sound impacts to other fish and shellfish receptors. The Underwater Sound Management Strategy will be developed and agreed with stakeholders post-consent.

2.8.1.51 Cumulative effects from nearby offshore wind farm construction, dredging and disposal, and other relevant projects were assessed within a 50km radius of the Morgan Generation Assets for direct impacts, and a 100km radius for underwater sound. These nearby projects were examined and predicted to result in negligible to minor adverse (non-significant) impacts on fish and shellfish species within the defined 50km study area. For underwater sound, the impact was assessed to be of moderate adverse significance in relation to herring and cod spawning, however as discussed for the project alone, the project has committed to the development of an Underwater Sound Management Strategy to reduce sound levels associated with significant impacts to environmentally acceptable levels; this Strategy will be developed and agreed with stakeholders post-consent. Residual effects following implementation of

the Strategy are expected to be of minor adverse significance, which is not significant in EIA terms.

2.8.1.52 No transboundary effects on the interests of other States are predicted with regard to fish and shellfish ecology from the Morgan Generation Assets.

Policy Compliance

2.8.1.53 With regard to fish and shellfish ecology, the Morgan Generation Assets has been assessed as required by the relevant NPSs and the NWCMP as set out above.

2.8.1.54 Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) presents a summary of the potential impacts and measures adopted as part of the project and residual effects in respect to fish and shellfish ecology. It also displays a summary of the potential cumulative impacts, mitigation measures and residual effects.

2.8.1.55 The construction, operations/maintenance, and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out demonstrates that there is no conflict with any of the conditions set out by the NPSs.

2.8.1.56 All matters raised by the NPSs have been addressed in the Environmental Statement and supporting information and although a number of potential impacts on fish and shellfish species associated with the construction, operation/maintenance and decommissioning phases of the Morgan Generation Assets were identified, these have been assessed as not significant in EIA terms.

2.8.1.57 Information on fish and shellfish ecology within the fish and shellfish ecology study area was collected through desktop review, with improved coverage of published literature ensured through stakeholder consultation, and incorporation of site-specific data opportunistically collected during site investigation surveys.

2.8.1.58 Table 3.42 presents a summary of the potential impacts, measures adopted as part of the project and residual effects in respect to fish and shellfish ecology. The impacts assessed include temporary habitat loss/disturbance, underwater sound impacting fish and shellfish receptors, increased SSCs and associated sediment deposition, long term habitat loss, EMFs from subsea electrical cabling, introduction and colonisation of hard structures, remobilisation of sediment bound contaminants and injury to basking shark due to increased risk of collision with vessels. Overall, it is concluded that, aside from underwater sound effects during construction, there will be no significant effects impacting fish and shellfish receptors. During construction, there is potential for the project alone to lead to potentially significant impacts to herring during the herring spawning season from underwater sound associated with piling (moderate adverse significance). It is proposed to manage and reduce the effect of this impact through establishment of an Underwater sound management strategy post-consent as tertiary mitigation (outline provided with the application, document reference J.13. This strategy establishes a process of investigating options to manage underwater sound levels in consultation with the licensing authority and SNCBs and agreeing, prior to construction of those works which would lead to underwater sound impacts, which mitigation measures will be implemented to reduce impacts such that there will be no residual significant effect. The Underwater sound management strategy is secured within the deemed marine licence in Schedule 14 of the draft DCO. Therefore, following implementation of this tertiary mitigation measure, there will be no significant residual effects.

2.8.1.59 Table 3.43 presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include temporary habitat loss/disturbance; underwater sound impacting fish and shellfish receptors; increased SSCs and associated sediment deposition; long term habitat loss; EMF from subsea electrical cabling; colonisation of hard structures, and injury due to increased risk of collision with vessels (basking shark only). Overall, it is concluded that there will be potentially significant cumulative effects from the Morgan Generation Assets alongside other projects and plans to herring and cod during their respective spawning seasons through the impact of underwater sound from piling (moderate adverse significance). Tertiary mitigation proposed for the project alone, based upon post-consent development of an Underwater sound management strategy (outline provided with the application, document reference J.13), will also reduce any cumulative effect based upon reducing the magnitude of sound generated by the Morgan Generation Assets. The Underwater sound management strategy is secured within the deemed marine licence in Schedule 14 of the draft DCO. Contribution to any cumulative effect from underwater sound during piling (and other relevant activities) by the Morgan Generation Assets will therefore not be significant. The assessment of cumulative effects from other plans and projects is based upon the respective MDSs presented in the Environmental Statements for tier 1 projects or PEIR for tier 2 projects. The assessment does not consider any further mitigation or reduced/refined project design envelopes for other tier 1 and/or tier 2 projects that may be implemented post-consent. However, it is understood that if other projects are consented, it is reasonable to assume that they will each implement appropriate measures such that any significant effect is reduced to a non-significant level. Although this assessment cannot conclude based upon this assumption, a significant cumulative impact is considered unlikely for this reason. No residual significant cumulative effects are expected to occur.

2.8.1.60 No potential significant transboundary impacts have been identified in regard to effects of the Morgan Generation Assets.

2.8.1.61 Accordingly, it has been demonstrated that the Morgan Generation Assets, subject to the mitigation adopted, accords with the requirements of NPS EN-1 and EN-3 and with Policies NW-FISH-3; Policy NW-MPA-1; Policy NW-BIO-2; Policy NW-INNS-1; Policy NW-DIST-1; Policy NW-UWN-2; Policy NW-CE-1 and Policy NW-CBC-1 of the WNMP.

2.8.1.62 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on fish and shellfish.

2.9 Marine mammals

2.9.1.1 This topic is assessed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.2 Table 2.6 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to marine mammals. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in further detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.6: Summary of National Policy Statements relevant to the Marine Mammals Assessment.

National Policy Statements – Paragraphs relevant to the Marine Mammals Assessment
NPS EN-1

Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.17
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.19
Biodiversity and Geological Conservation – Applicant Assessment - Paragraph 5.4.22
Biodiversity and Geological Conservation – Mitigation - Paragraph 5.4.35
NPS EN-3
Offshore Wind – Marine Protected Areas - Paragraph 2.8.52 and 2.8.53
Offshore wind environmental standards - Paragraph 2.8.90 – 2.8.92
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.98
Offshore Wind – Biodiversity and ecological conservation - Paragraph 2.8.101 – 2.8.106
Offshore Wind – Marine Mammals - Paragraph 2.8.131 – 2.8.135

2.9.1.3 In accordance with NPS EN-1 paragraphs 5.4.17 and 5.4.19, the potential effects on internationally, nationally and locally designated sites for ecological or geological features of conservation importance have been identified and assessed for the Morgan Generation Assets.

2.9.1.4 The HRA Stage 1 Screening (Document Reference E1.4) identified direct or indirect effects on sites which could be affected, and those sites have been assessed in the HRA Stage 2 ISAA (Document Reference E1.1).

2.9.1.5 Important protected areas for marine mammals have been discussed in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1) and in section 4.5.2 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.6 Measures that will be adopted as part of the Morgan Generation Assets to conserve marine mammal biodiversity are presented in section 4.8 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.7 The movement of mobile/migratory species such as marine mammals is considered across the UK in section 4.9, across Europe in section 4.11 and a transboundary assessment is provided in section 4.12 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) in accordance with NPS EN-1 paragraph 5.4.22.

2.9.1.8 In accordance with NPS EN1 paragraph 5.4.35, appropriate avoidance and mitigation measures (primary and tertiary mitigation) relevant for marine mammals which will be adopted as part of the Morgan Generation Assets are detailed in section 4.8 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.9 For example, measures include (but are not limited to):

- A maximum separation distance has been committed to alongside a maximum concurrent piling energy of 3,000 kJ, to reduce the area of ensonficiation required for the works (Table 4.16 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4)
- During piling, an initiation and soft start stage will be implemented and committed to via the Outline Marine Mammal Mitigation Protocol (MMMP) (Document

Reference J17), which reduces the risk of disturbance or damage to marine mammal species

- During the construction phase and operation and maintenance phase, vessel movements will be confined to the array areas and/or offshore cable corridor routes and are likely to follow existing shipping routes to and from port to reduce risk of disturbance or damage from transport access. An outline Vessel traffic management plan has been submitted as part of the Application (Document reference J16).

2.9.1.10 Furthermore, measures to reduce impacts on benthic species (see Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) (such as amending the boundaries of the Morgan Array Area and avoiding sensitive habitats where recovery will be limited) will have indirect benefits to marine mammals, as higher trophic level animals.

2.9.1.11 The application of a Maximum Design Scenario (MDS) ensures that the assessment has been undertaken against the greatest potential effects that could occur and therefore fully captures the maximum area across which the impacts associated with the Morgan Generation Assets could occur.

2.9.1.12 Important marine protected areas, SACs designated for marine mammals, and Marine Nature Reserves (MNRs) in Manx waters are identified in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1 and in section 4.5.2 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.13 Primary and tertiary mitigation relevant for marine mammals which will be adopted as part of the Morgan Generation Assets are detailed in section 4.8 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).This includes the Outline Underwater Sound Management Strategy (UWSMS) (Document Reference J13) (in advance of start of construction, the Outline UWSMS sets out a detailed project design, alongside the option list of potential management measures that may be implemented, to ensure any effects are reduced to an acceptable level (e.g. Acoustic Deterrent Devices (ADD) , spatial restrictions or noise abatement systems (NAS)) and includes the Outline MMMP (Document Reference J17) as required by NPS EN-3 paragraph 2.8.52 and 2.8.53.

2.9.1.14 The project is aware of the requirements in NPS EN-3 to apply the guidance on Environmental Standards once this final OEWS guidance is issued. In accordance with NPS EN-3 Paragraphs 2.8.90 to 2.8.92 the project will review the guidance once available and determine how the project complies, and consider where, if relevant, the project departs from the Offshore Wind Environmental Standards, providing reasoning for any departure including details of any agreements made with statutory consultees.

2.9.1.15 As required by NPS EN-3 paragraph 2.8.98, a full assessment of the potential for impacts on marine mammals within the Morgan marine mammal study area is provided in of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and includes consideration of direct and indirect impacts on these habitats. The assessment has covered all phases of Morgan Generation Assets.

2.9.1.16 In accordance with NPS EN-3 paragraphs 2.8.101 to 2.8.103 both potential positive and negative effects for marine mammals have been considered for the Morgan Generation Assets in section 4.9 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). These are also considered in the Biodiversity Benefit Statement (Document Reference J18).

2.9.1.17 In addition, in order to address NPS EN-3 paragraphs 2.8.104 to 2.8.106, assessment methodologies and baseline data collection has been consulted on, through the Evidence Plan Process (EPP). Relevant data that has been collected as part of post-construction ecological monitoring from existing operational offshore wind farms has been included where appropriate to inform the baseline in section 4.5 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4), with further detail given in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1).

2.9.1.18 Finally, in accordance with NPS EN-3 paragraphs 2.8.131 to 2.8.135 the potential for effects on marine mammals has been assessed in section 4.9 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and a detailed technical baseline, including likely feeding areas; known birthing areas/haul out sites; known migration or commuting routes has been presented within Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1). Important Relevant protected areas for marine mammals to the Morgan Generation Assets are discussed in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement and in section 4.5.2 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.19 Baseline sound levels; predicted received sound levels in relation to mortality, Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) and disturbance; soft-start sound levels according to proposed hammer and pile design; and operational sound have been considered within Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement.

2.9.1.20 The duration and spatial extent of potentially disturbing activities, including cumulative/in-combination effects with other plans or projects is presented in 4.11 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.21 Collision risk has been considered within section 4.9.6 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). Where relevant, the potential for barrier effects has been considered.

2.9.1.22 Within Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4), potential sound as a result of piling activity at the Morgan Generation Assets has been discussed in section 4.9.3, potential sound as a result of UXO clearance activities has been discussed in section 4.9.4 and potential sound noise as a result of geophysical surveys has been discussed in section 4.9.7. Appropriate measures adopted as part of the Morgan Generation Assets to minimise the potential for an offence, along with those specific to construction, operations and maintenance and decommissioning are presented in section 4.8.

2.9.1.23 Furthermore, an Outline Underwater sound management strategy (Document Reference J13) has been prepared to investigate options to reduce any potential significant impacts such that there will be no residual significant effects from the project alone, and is secured in the deemed marine licence within the draft DCO (Document Reference C1).

Other Policy Considerations

2.9.1.24 Table 2.7 below lists other national policy considerations relevant to the marine mammals assessment.

Table 2.7: Summary of Other National Policy Considerations relevant to the Marine Mammals Assessment

NPPF and North West Inshore and Northwest Offshore Marine Plan – Policies relevant to the Marine Mammals Assessment
NPPF – Paragraph 8
NPPF – Paragraph 180
NPPF – Paragraph 187
NWCMP: Marine Protection Areas - NW-MPA-1
NWCMP: Biodiversity - NW-BIO-2
NWCMP: Cumulative Effects - NW-CE-1

2.9.1.25 In accordance with **Paragraphs 8, 180 and 187 of the NPPF** measures that will be adopted as part of the Morgan Generation Assets to conserve marine mammal biodiversity are presented in section 4.8 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and within Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). An assessment of the potential impact on marine mammals has been presented in section 4.9 for the project alone and cumulatively with other plans and projects in section 4.11. Measures to minimise the potential for impacts on marine mammals are set out in section 4.8.

2.9.1.26 Important marine protected areas, SACs designated for marine mammals, MNRs in Manx waters are identified in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1) and in section 4.5.2 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.27 An assessment of the potential effects on SACs designated for marine mammals is provided in the HRA Stage 2 ISAA (Document Reference E1.1).

2.9.1.28 Regarding **NWCMP Policy NW-MPA-1** the spatial scale of effects in relation to sites protected for marine mammal features (e.g. SACs, MNRs) has been identified and a detailed assessment of the spatial overlap with European nature conservation designations has been undertaken as part of the HRA (HRA Stage 2 ISAA (Document Reference E1.1)). Measures have been adopted to reduce the spatial scale of effects and are described in section 4.8 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

2.9.1.29 The project will adopt a range of measures (primary and tertiary) as part of the Morgan Generation Assets to mitigate negative effects as detailed in section 4.9 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and required by **NWCMP Policy NW-BIO-2**.

2.9.1.30 Cumulative effects, as required by **NWCMP Policy NW-CE-1**, have been quantified and their significance assessed in section 4.11 of Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). A detailed Outline MMMP (Document Reference J17) will be developed post-consent subject to project refinements and will consider mitigation in order to reduce the effects both for the project alone and with regards to its contribution to cumulative effects.

Summary of Effects

2.9.1.31 Information on marine mammals within the Morgan marine mammal study area was collected through desktop review, site surveys and consultation with the EWG.

2.9.1.32 Table 4.59 presents a summary of the potential impacts, measures adopted as part of the Morgan Generation Assets and residual effects in respect to marine mammals. The impacts assessed include:

- Injury and disturbance from elevated underwater sound during piling
- Injury and disturbance from elevated underwater sound during UXO clearance
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities
- Increased likelihood of injury due to collision with vessels
- Injury and disturbance from elevated underwater sound generated from pre-construction survey sources
- Underwater sound from wind turbine operation
- Changes in fish and shellfish communities affecting prey availability.

2.9.1.33 Overall, for most potential impacts it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases.

2.9.1.34 However, for harbour porpoise only, a potential significant impact was concluded for elevated underwater sound during UXO clearance when assessed using high order clearance of a 907 kg UXO (the absolute maximum). Therefore, whilst the assessment is based upon the absolute maximum UXO as per the MDS, it is acknowledged that this is very precautionary. Detailed surveys post-consent will inform the Morgan Generation Assets' understanding of the type and size of UXO that require clearance and consequently the most appropriate method for clearance. There is a general hierarchy of preferred mitigation with regard to UXO: avoid UXO, clear UXO with low order techniques and then clear with high order techniques where low order is not possible (dependent upon the individual situations surrounding each UXO). The Applicant has committed to the development of and adherence to a MMMP (Document Reference J17), which forms an annex to the Underwater sound management strategy (Document Reference J13) and both of which are secured within the deemed marine licences in the draft DCO (Document Reference C1).

2.9.1.35 Specifically, the MMMP (Document Reference J17) will secure the primary and tertiary mitigation measures (e.g. low order clearance, use of ADDs and soft start charges), with an outline MMMP included as part of the application (Document Reference J17). The Outline underwater sound management strategy (Document Reference J13) establishes a process of investigating options to manage underwater sound levels in consultation with the licensing authority and SNCBs and agreeing, prior to construction of those works which would lead to underwater sound impacts, which mitigation measures will be implemented to reduce the magnitude of impacts such that there will be no residual significant effect for the project alone (such as from elevated underwater sound during UXO clearance). Whilst the focus is on harbour porpoise (as a significant effect was concluded for this species from elevated underwater sound during UXO clearance) these measures would also result in a reduction of underwater sound impacts to other marine mammal receptors.

2.9.1.36 Table 4.60 presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include:

- Injury and disturbance from elevated underwater sound generated during piling
- Injury and disturbance from elevated underwater sound during UXO clearance
- Injury and disturbance from elevated underwater sound generated from pre-construction survey sources
- Injury and disturbance from elevated underwater sound due to vessel use and other (non-piling) sound producing activities
- Increased likelihood of injury due to collision with vessels
- Changes in fish and shellfish communities affecting prey availability.

2.9.1.37 Overall, it is concluded that for most impacts there will be no significant cumulative effects from the Morgan Generation Assets alongside other projects/plans, except as a result of behavioural disturbance during piling for bottlenose dolphin within the Irish Sea MU and potential injury from UXO clearance for harbour porpoise, which have a potential significant cumulative effect.

2.9.1.38 The potential cumulative impact of piling at projects across the Irish Sea could result in potential reductions to reproductive success during an animal's lifetime to some individuals in the Irish Sea MU population, as disturbance in offshore areas during piling could lead to a longer duration over which individuals may be displaced from key feeding areas and therefore there may be a further reduction in the size of declining MU population. The assessment of cumulative effects from other plans and projects is based upon the respective MDSs presented in the Environmental Statements for Tier 1 projects or PEIR for Tier 2 Projects. The assessment does not consider any further mitigation or reduced/refined project design envelopes for other Tier 1 and/or Tier 2 projects that may be implemented post consent. However, it is understood that if other projects are consented, they will each implement appropriate measures such that any significant effect is reduced to a non-significant level. Therefore, whilst this assessment cannot conclude based upon this assumption, a significant cumulative impact is considered unlikely for this reason.

2.9.1.39 Whilst the project alone assessment determined there is no potential for a significant effect from elevated underwater sound during piling in EIA terms, it is acknowledged the Morgan Generation Assets may contribute to the cumulative impact within the CEA area. As such an Outline underwater sound management strategy (Document Reference J13) has been submitted with the application for consent (alongside the Outline MMMP (Document Reference J17)). The Outline underwater sound management strategy (Document Reference J13) establishes a process for investigating options to manage underwater sound levels in consultation with the MMO and SNCBs and agreeing, prior to construction of those works which would lead to underwater sound impacts, which mitigation measures will be implemented to reduce the magnitude of impacts such that there will be no residual significant effect for the Morgan Generation Assets. The final Underwater sound management strategy (Document Reference J13) will set out the measures agreed with the MMO and SNCBs to reduce sound levels associated with residual significant impacts from the Morgan Generation Assets to a non-significant level, and to minimise the Morgan Generation Asset's contribution to any cumulative effect.

2.9.1.40 As a result of UXO clearance, on the basis of the MDS (absolute maximum 907 kg UXO) high order detonation, there may be some residual effect in-combination with

other projects with a small number of animals potentially exposed to sound levels that could elicit PTS. However, the likelihood of UXO clearance being undertaken simultaneously with other projects is considered to be very low.

2.9.1.41 No potential for significant transboundary impacts has been identified in regard to effects of the Morgan Generation Assets.

Policy Compliance

2.9.1.42 With regard to marine mammals, Morgan Generation Assets has been assessed as required by the relevant NPSs and the NWCMP.

2.9.1.43 Volume 2, Chapter 4: Marine Mammals of the Environmental Statement (Document Reference F2.4) presents a summary of the potential impacts and measures adopted as part of the project and residual effects in respect to marine mammals. It also displays a summary of the potential cumulative impacts, mitigation measures and residual effects.

2.9.1.44 The construction, operations/maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs or other relevant policy.

2.9.1.45 All matters raised by the NPSs and other policy have been addressed in the Environmental Statement and supporting information.

2.9.1.46 Accordingly, it has been demonstrated that Morgan Generation Assets, subject to the mitigation proposed, accords with the requirements of NPS EN-1 and EN-3, Paragraphs 8. 180 and 187 of the NPPF and with Policies NW-MPA-1; NW-BIO-2 and NW-CE-1 of the NWCMP.

2.9.1.47 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on marine mammals.

2.10 Offshore ornithology

2.10.1.1 This topic is assessed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.2 Table 2.8 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to offshore ornithology. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.8: Summary of National Policy Statements relevant to the Offshore Ornithology Assessment

National Policy Statements – Paragraphs relevant to the Offshore Ornithology Assessment
NPS EN-1
Environmental Effects/Considerations - Paragraphs 4.3.1, 4.3.3 and 4.3.5
Environmental Effects/Considerations – Applicant's Assessment –Paragraphs 4.3.10 – 4.3.12
Biodiversity and Geological Conservation – Habitats Regulations - Paragraphs 5.4.4 – 5.4.5 and 5.4.7
Biodiversity and Geological Conservation – Protection and enhancement of habitats and specie - Paragraph 5.4.16

Biodiversity and Geological Conservation – Applicant's Assessment – Paragraphs 5.4.17 - 5.4.19
Mitigation – Paragraph 5.4.35
NPS EN-3
Offshore Wind – Offshore wind environmental standards - Paragraphs 2.8.90 – 2.8.92
Offshore Wind – Biodiversity and ecological Conservation - Paragraph 2.8.104
Impacts - Subtidal habitats and species - Paragraph 2.8.126
Impacts – Birds - Paragraph 2.8.136
Offshore Wind – Birds - Paragraph 2.8.143 and 2.8.144
Impacts - Other offshore infrastructure and activities - Paragraph 2.8.198
Mitigation - Subtidal habitats and species – Paragraph 2.8.234
Impacts - Biodiversity and ecological conservation - Paragraph 2.8.302 ad 2.8.305

2.10.1.3 In compliance with the requirements of EN-1 Paragraphs 4.3.1 and 4.3.3 an assessment of the potential effects of the Morgan Generation Assets relevant to offshore ornithology is considered in section 5.9 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).The approach to mitigation is discussed in section 5.8, section 5.9and section 5.11 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.4 Regarding EN-1 Paragraph 4.3.5 all construction, operations and maintenance and decommissioning effects of the Morgan Generation Assets relevant to offshore ornithology are assessed in section 5.9 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). There are not anticipated to be any impacts on offshore ornithological receptors during the pre-construction stage of the Morgan Generation Assets, therefore Morgan Generation Assets complies with the requirements set in the paragraph.

2.10.1.5 Volume 1, Chapter 2, Policy and Legislative Context of the Environmental Statement (Document Reference F1.2) sets the legislative context, and Volume 1, Chapter 5, Environmental Impact Assessment Methodology of the Environmental Statement (Document Reference F1.5) sets out the proportionate approach taken to the assessment. The information in these topic chapters address the requirements of EN-1 paragraph 4.3.10.

2.10.1.6 In compliance with EN-1 paragraphs 4.3.11 – 4.3.12, a maximum design scenario (MDS) has been applied to the assessment and it is shown in Table 5.25 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). The MDS has been selected as those scenarios having the potential to result in the greatest effect on an identified receptor or receptor group. The assessment of effects is contained in section 5.9 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.7 Internationally designated sites are identified in section 5.5.3 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and are described in Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference 4.5.1) and, where relevant assessments provided in ISAA Part 3 – SPA and Ramsar Site Assessments (document reference E.1.2). Internationally designated sites, including potential SPAs,

are identified in Table 5.15 and described in Volume 4, Annex 5.1: Offshore ornithology baseline characterisation of the Environmental Statement (Document Reference 4.5.1).

2.10.1.8 The findings of the HRA process are reported in an Information to Support Appropriate Assessment (ISAA) part 3 – SPA and Ramsar Sites Assessments (document reference E.1.3), which assesses the impact specifically on all European sites and is submitted alongside the Environmental Statement. Taken together, this address and comply with the requirements of EN-1 paragraphs 5.4.4 – 5.4.5.

2.10.1.9 Regarding EN-1 paragraph 5.4.16, the assessments presented in this chapter of the Environmental Statement have followed relevant legislation and guidance as identified in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) and Volume 2, Chapter 15: Inter-related Effects (Offshore) of the Environmental Statement (Document Reference F2.15) with regards to inter-dependencies and ecosystem impacts therefore the application complies with these requirements.

2.10.1.10 When looking at EN-1 paragraphs 5.4.1 – 5.4.19, the baseline ornithological environment is described in section 5.4 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). As part of this chapter, the process of identifying designated sites has been undertaken and results are presented in section 5.5.3 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.11 The specific bird species that may be impacted by the potential effects of the Morgan Generation Assets are identified in Table 5.15 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and an assessment of the potential effects for these specific species are identified and considered in section 5.9 of Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.12 The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of the Morgan Generation Assets including measures to preserve ecologically important features as well as broader measures such as the development of an environmental management plan. These measures have been put in place to take advantage of opportunities to conserve ecological features of conservation interest.

2.10.1.13 The Applicant's approach to biodiversity enhancement is presented in the Biodiversity Benefit Statement (Document Reference J18). The Applicant has identified a number of opportunities within the Irish Sea which could deliver additional intertidal and offshore biodiversity benefits, including increases to the productivity of breeding seabirds, biodiversity enhancing cable protection, artificial reef blocks and restoration of fish and shellfish habitats outside of protected sites. The Applicant will continue to explore these opportunities as the Morgan Generation Assets design develops, in collaboration with stakeholders post-consent, which is in compliance with these paragraphs.

Other Policy Considerations

2.10.1.14 Table 2.9 below lists other national policy considerations relevant to the offshore ornithology assessment.

Table 2.9: Summary of Other National Policy Considerations relevant to the Offshore Ornithology Assessment.

North West Inshore and North West Offshore Coast Marine Plan (NWMP)
Seascape and Landscape - NW-SCP-1
Marine Protection Areas - NW-MPA-1
Biodiversity - NW-BIO-1
Biodiversity - NW-BIO-2
Cumulative Effects - NW-CE-1

2.10.1.15 Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) as well as Volume 4, Annex 5.1: Offshore ornithology baseline characterisation report of the Environmental Statement (Document Reference F4.5.1), designated sites with mobile features connected to the Morgan Generation Assets have been identified. This is to ensure that all features and species of conservation importance were considered, where relevant, in this assessment.

2.10.1.16 The HRA Stage 1 Screening Report (document reference E1.4) considers the direct or indirect effects on features of relevant Special Protection Area (SPA) sites, and where relevant will be included in the HRA Stage 2 ISAA – Part 3 - SPA assessments (document reference E1.3). Taken together, these elements comply with the requirements of **NWCMP Policy NW-SCP-1**.

2.10.1.17 Compliance with **NWCMP Policy NW-MPA-1** is achieved as evidenced in Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) and Volume 4, Annex 5.1: Offshore ornithology baseline characterisation report of the Environmental Statement (Document Reference F4.5.1) which demonstrates that designated sites with mobile features connected to the Morgan Generation Assets have been identified. This is to ensure that all features and species of conservation importance were considered, where relevant, in this assessment. The E1.4 HRA Phase 1 Screening Report considers the direct or indirect effects on features of relevant SPA sites, and where relevant are included E1.3 ISAA Part 3 – SPA and Ramsar Site Assessments (Document Reference E1.1 – E1.3) and in the Biodiversity benefit statement (document reference J.18).

2.10.1.18 **NWCMP Policies NW-BIO-1 and NW-BIO-2** have been addressed and complied. The Morgan Generation Assets will aim to conserve habitats and species as far as reasonably practicable through a number of measures adopted to reduce the impact of the Morgan Generation Assets, as demonstrates in Section 5.8 of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5). The Biodiversity benefit statement (Document Reference J18) also contains reference to the measures adopted as part of the Morgan Generation Assets, including where sensitive project design and secondary mitigation has been considered, in such cases where an impact is considered to be significant in EIA terms. This assessment is undertaken for each impact in section 5.9 of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5).

2.10.1.19 Cumulative effects have been quantified and their significance assessed in section 5.11 of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5. The assessment has adhered to the mitigation hierarchy (to avoid, minimise and mitigate) as set out in Volume 1, Chapter 5: EIA Methodology Chapter of the Environmental Statement (Document Reference F1.5) and the site selection process described in Volume 1, Chapter 4: Site Selection and

Consideration of Alternatives of the Environmental Statement (Document Reference F1.4). Taken together, these address the requirements of **NWCMP Policy NW-CE-1**.

Summary of Effects

2.10.1.20 Information on offshore ornithology within the Offshore Ornithology study areas as defined in section 5.4.4of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) was collected through review of available literature, other offshore wind farm assessments, UK statutory guidance, detailed analysis of the data collected during the site-specific aerial surveys, and consultation with relevant stakeholders.

2.10.1.21 Table 5.172 of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) presents a summary of the potential impacts, measures adopted as part of the project and residual effects in respect to offshore ornithology.

2.10.1.22 The impacts assessed include disturbance and displacement from airborne noise, underwater sound, and presence of vessels and infrastructure, indirect impacts from underwater sound affecting prey species, temporary habitat loss/ disturbance and increased SSCs, collision risk and barrier to movement.

2.10.1.23 Overall, it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases.

2.10.1.24 Table 5.173 of Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include disturbance and displacement from airborne noise, underwater sound, and presence of vessels and infrastructure and collision risk.

2.10.1.25 Overall, it is concluded that there are no significant cumulative effects to any species from the Morgan Generation Assets alongside other projects/plans. It is concluded that no mitigation or monitoring is required.

2.10.1.26 Potential transboundary impacts have been identified in relation to offshore ornithology. Overall, it is concluded that there will be no significant transboundary effects arising from the Morgan Generation Assets.

Policy Compliance

2.10.1.27 With regard to Offshore Ornithology, Morgan Generation Assets has been assessed as required by the relevant NPSs and the NWCMP.

2.10.1.28 Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) presents a summary of the potential impacts and measures adopted as part of the project and residual effects in respect to offshore ornithology. It also displays a summary of the potential cumulative impacts, mitigation measures and residual effects.

2.10.1.29 The assessments conclude that there will only be negligible or minor adverse effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases, which are not significant in EIA terms.

2.10.1.30 The construction, operations/maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and

assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs or other relevant policy.

2.10.1.31 All matters raised by the NPSs and other policy have been addressed in the Environmental Statement and supporting information.

2.10.1.32 Accordingly, it has been demonstrated that Morgan Generation Assets, subject to the mitigation proposed, accords with the requirements of NPS EN-1 and EN-3 and with Policies NW-SCP-1, NW-MPA-1; NW-BIO-1, NW-BIO-2 and NW-CE-1 of the NWCMP.

2.10.1.33 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on offshore ornithology.

2.11 Commercial fisheries

2.11.1.1 This topic is assessed in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

2.11.1.2 Table 2.10 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to commercial fisheries. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.10: Summary of National Policy Statements relevant to the commercial fisheries assessment.

National Policy Statements – Paragraphs relevant to the Commercial Fisheries assessment
NPS EN-3
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.153 – 2.8.164
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.318 – 2.8.324
Offshore Wind – Commercial Fisheries and Fishing - Paragraph 2.8.250 and 2.8.251

2.11.1.3 The different procedures associated with the construction, operations and maintenance and decommissioning of the Morgan Generation Assets are considered within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

2.11.1.4 As required by NPS EN-3 paragraph 2.8.153 to ensure that potential impacts which may affect certain fleets/fisheries in different ways are fully assessed, a number of commercial fisheries receptor groups have been identified through review of data and feedback from stakeholder consultation. A total of seven main receptor groups have been defined. These have been categorised based on gear type, nature of fishing activity and nationality and are summarised in Table 6.7 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), whilst displacement of commercial fisheries into other areas have been assessed for all phases of the Morgan Generation Assets in section 6.8.2 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

2.11.1.5 In accordance with NPS EN-3 paragraph 2.8.154, Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), sets out in

section 11.5.1 how liaison with the fishing industry, via the Company Fisheries Liaison Officer (CFLO) and Fishing Industry Representative (FIR), is being adhered to in line with the good practice guidance. Early engagement was established with fisheries stakeholders in June 2021 and will continue throughout the lifetime of the project as set out in section 11.3 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). To communicate the commitments and measures by the Morgan Generation Assets to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of an Outline Fisheries Liaison and Co-existence Plan (OFLCP). This plan has been included with this application (Document Reference J10).

2.11.1.6 In accordance with NPS EN-3 paragraphs 2.8.155 and 2.8.158, consultation with relevant stakeholders (local, regional, national and international) has been undertaken for the Morgan Generation Assets and is summarised in section 11.3 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), with further information set out in Volume 4, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F4.6.1) and the Consultation Report, which has been submitted as part of this application. The transmission assets are being taken forward as a separate DCO application and have not been assessed within this chapter (see Volume 1, Chapter 1: Introduction of the Environmental Statement).

2.11.1.7 In accordance with NPS EN-3 paragraph 2.8.156, potential impacts to fish stocks arising from the Morgan Generation Assets have been assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Potential impacts on the commercial fisheries that target the fish stocks are assessed in section 6.8.5.4 of this chapter. Potential impacts to commercial fisheries have been described in section 6.8, and cumulative effects are described in section 6.9 of Volume 2, Chapter 6: Commercial Fisheries of the Environmental Statement (Document Reference F2.6).

2.11.1.8 In accordance with NPS EN-3 paragraph 2.8.157, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement outlines the potential impacts on fish stocks, including those of commercial interest. Baseline fisheries activity data has been collated from official sources and through consultation, as described in section 6.4.1 and Volume 2, Annex 6.1: Commercial fisheries technical report of the Environmental Statement. Likely constraints and safety zones associated with the Morgan Generation Assets are assessed in section 6.6. Paragraph 6.8.1.40 discusses potential benefits on fishing activity within offshore wind farm project boundaries, which has been taken forward into the impact assessment (section6.8) for the relevant receptor group.

2.11.1.9 In accordance with NPS EN-3 paragraph 2.8.159, liaison with the fishing industry, via the CFLO and FIR, is being adhered to in line with the good practice guidance outlined in section 6.5.1. To communicate the commitments and measures by the Morgan Generation Assets to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of a Fisheries Liaison and Co-existence Plan. An outline of this plan has been included with the Application (Document Reference J10).

2.11.1.10 In accordance with NPS EN-3 paragraph 2.8.160, transboundary issues have been described in section 11.11 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), where consideration has been given to both UK and non-UK fishing fleets.

2.11.1.11 In accordance with NPS EN-3 paragraph 2.8.161 to 2.8.164, implications from the implementation of safety zones on commercial fishing have been presented in section 11.8 and more information on the implemented safety zones is provided in Table 11.12 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

2.11.1.12 Safety zones are included within the PDE and have been considered within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7) and Volume 4, Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F4.7.1). Advisory clearance distances will be committed to within the Fisheries Liaison and Co-existence Plan which is secured within the deemed marine licence(s) in the draft Development Consent Order (DCO). An outline of this plan has been submitted with the Application (Document reference J10). Formal safety zones will be applied for via a formal safety zone application. More information on the implemented safety zones is provided in Table 6.12.

2.11.1.13 Compliance with NPS EN-3 Paragraph 2.8.318 is achieved as the potential impacts arising from the Morgan Generation Assets have been discussed with statutory bodies during consultation. The Applicant is taking and will continue to take steps to minimise the effects upon the industry in the area through appropriate mitigation, where required (see section 6.7 of Volume 2, Chapter 6 Commercial Fisheries of the Environmental Statement, Document Reference F2.6). To communicate the commitments and measures by the Morgan Generation Assets to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of a Fisheries Liaison and Co-existence Plan, which is secured within the deemed marine licence(s) in the draft DCO. An outline of this plan has been included with the Application (Document Reference J10).

2.11.1.14 Potential impacts to fish stocks arising from the Morgan Generation Assets have been assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement. Potential impacts on the commercial fisheries that target the fish stocks are assessed in section 6.8.5.4 of Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

2.11.1.15 Potential impacts to commercial fisheries have been described in section 6.8, and cumulative effects are described in section 6.9 of the Environmental Statement (Document Reference F2.6).

2.11.1.16 NPS EN-3 Paragraphs 2.8.319 – 2.8.321 are addressed and complied. The Applicant has considered the extent to which the Morgan Generation Assets will overlap with recognised fishing grounds and has carried out consultation with fishing stakeholders, in order to fully understand any potential impacts (see section 6.3). The results of this assessment are presented in this chapter (see section 6.8). Potential impacts to commercial fisheries have been described in section 6.8, and cumulative effects are described in section 6.9 of Volume 2, Chapter 6 Commercial Fisheries of the Environmental Statement, Document Reference F2.6). Each potential impact within these assessments have been assessed separately for each identified receptor group (Table 6.7) and phase of the Morgan Generation Assets.

2.11.1.17 Finally, the Applicant is taking and will continue to take steps to facilitate co-existence with existing commercial fishing activity and minimise disruption as far as is practicably possible in line with the requirements of NPS EN-3 Paragraph 2.8.322. Early engagement was established with fisheries stakeholders in June 2021 and will

continue throughout the lifetime of the project (see section 6.3 of Volume 2, Chapter 6 Commercial Fisheries of the Environmental Statement, (Document Reference F2.6)).

2.11.1.18 Liaison with the fishing industry, via the CFLO and FIR, is being adhered to the good practice guidance outlined in section 6.5.1 of Volume 2, Chapter 6 Commercial Fisheries of the Environmental Statement, (Document Reference F2.6). To communicate the commitments and measures by the Morgan Generation Assets to co-exist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible, the Applicant has committed to the development of a Fisheries Liaison and Co-existence Plan, which is secured within the deemed marine licence(s) in the draft DCO. An outline of this plan has been included with the Application (Document Reference J10).

Other Policy Considerations

2.11.1.19 Table 2.11 below lists other national policy considerations relevant to the commercial fisheries assessment.

Table 2.11: Summary of Other National Policy Considerations relevant to the Commercial Fisheries Assessment

North West Inshore and North West Offshore Coast Marine Plan
Fisheries: Policy NW-FISH-2 & Policy NW-FISH-3
Cumulative Effects: Policy NW-CE-1
Co-existence: Policy NW-CO-1

2.11.1.20 **NWCMP Policy NW-FISH-2** the Morgan Generation Assets assessment has considered the potential impacts on commercial fisheries within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6) including loss or restricted access to fishing grounds, displacement of fishing activity, interference with fishing activity, temporary increase in steaming distances, loss of damage to fishing gear due to snagging, potential impacts on commercially important fish stocks, and supply chain opportunities for local fishing vessels. Overall, it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases in relation to commercial fisheries following the implementation of embedded and further mitigation measures.

2.11.1.21 **NWCMP Policy NW-FISH-3** the Morgan Generation Assets assessment has considered the impacts on fish stocks in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and includes potential impacts on habitats, spawning, nursery and feeding grounds, and migratory routes.

2.11.1.22 **NWCMP Policy NW-CE-1** cumulative impacts on commercial fisheries are assessed in section 11.10 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

2.11.1.23 **NWCMP Policy NW-CO-1** the Applicant is taking and will continue to take steps to minimise the impacts upon the fishing industry in the area through appropriate mitigation where required. Designed-in measures related to commercial fisheries are provided in section 11.7 of Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), and include a commitment to

develop a Fisheries, Liaison and Co-existence Plan. An OFLCP has been included with this application (Document Reference: J10).

Summary of Effects

2.11.1.24 Information on commercial fisheries within the commercial fisheries study area was collected through a review of official datasets; additional information and knowledge obtained through consultation with fisheries groups; and site-specific surveys.

2.11.1.25 A number of potential impacts on commercial fisheries groups, associated with the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets, were identified. These included:

- Loss or restricted access to fishing grounds
- Displacement of fishing activity Interference with fishing activity
- Interference with fishing activity
- Temporary increase in steaming distances
- Loss or damage to fishing gear due to snagging
- Potential impacts on commercially important fish stocks
- Supply chain opportunities for local fishing vessels.

2.11.1.26 Loss or restricted access to fishing grounds is an impact that is of particular importance for Scottish west coast vessels and Isle of Man vessels, who rely on a queen scallop and king scallop grounds within and around the Morgan Array Area. During construction, the loss or restricted access to fishing grounds is assessed as an effect no greater than minor adverse significance (not significant in EIA terms) on all commercial fisheries receptor groups, due to the temporary and intermittent nature of the works. During the operations and maintenance phase, a minor adverse effect is also predicted on the Scottish west coast scallop vessels and Isle of Man vessels receptor groups, which is not significant in EIA terms. To mitigate the potential for project infrastructure to severely restrict fishing and to promote co-existence, the Applicant has made a commitment to maintaining an area free of wind turbines and OSPs over an area of core scallop grounds within the Morgan Array Area, termed the Scallop Mitigation Zone. Project-specific consultation has established that scallop and static gear vessels tow and deploy their gear in a north to south alignment within the Morgan Array Area, which is the only orientation possible due to tides in the region. The Applicant has also committed to positioning wind turbine rows in a roughly north to south alignment, to allow for continued fishing within the Morgan Array Area (secured within the Outline Fisheries Liaison and Co-existence Plan, Document Reference J10).

2.11.1.27 Displacement of vessels into other fishing grounds can cause conflict with other fishing gears. During construction, the displacement of vessels into other areas, and the potential adverse impacts on existing fisheries in the areas that vessels are displaced into, is assessed as an effect no greater than negligible adverse significance (not significant in EIA terms) for all commercial fisheries receptor groups. This is due to the safety zones, advisory clearance distances, and the temporary and intermittent nature of the works during the construction phase. During the operations and maintenance phase, the minimum spacing between wind turbines (1,400 m) and between rows of wind turbines (1,400 m) within the Morgan Array Area may restrict mobile gear deployment for vessels such as those that target scallop. The Scottish west coast scallop vessels, for example, have limited spatial tolerance due to significant

dependence upon the commercial fisheries study area for queen scallop dredging. The Applicant has made a number of commitments to mitigate the potential for displacement as a result of the Morgan Generation Assets and to promote co-existence and co-location. These commitments are outlined and secured within the Outline Fisheries Liaison and Co-existence Plan (Document Reference J10).

2.11.1.28 The main cumulative impact identified between the Morgan Generations Assets and other plans and projects for commercial fisheries focused on loss or restricted access to fishing grounds arising from the operations and maintenance phase. The cumulative effect of loss or restricted access to fishing grounds on Scottish west coast scallop vessels and Isle of Man scallop vessels, as a result of other plans/projects, is of minor adverse significance (which is not significant in EIA terms).

2.11.1.29 Transboundary effects outside UK waters are limited to the potential displacement of effort from the Morgan Generation Assets into non-UK waters and potential effects on commercially important fish and shellfish resources which could occur in non-UK waters. It is not anticipated that these effects would be significant.

Policy Compliance

2.11.1.30 With regard to commercial fisheries, the Morgan Generation Assets has been assessed as required by the relevant NPSs and relevant Marine policies.

2.11.1.31 The assessments carried out conclude that effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases, following the implementation of embedded and further mitigation measures regarding loss or restricted access to fishing grounds; interference with fishing activity and loss or damage of fishing gear due to snagging will not be significant in EIA terms.

2.11.1.32 Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-3 and with Policies NW-FISH-2 & NW-FISH-3; NW-CE-1 and Policy NW-CO-1 of the NWCMP.

2.11.1.33 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the negligible potential effects on commercial fisheries.

2.12 Shipping and navigation

2.12.1.1 This topic is assessed in Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.2 Table 2.12 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to shipping and navigation. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.12: Summary of National Policy Statements relevant to the Shipping and Navigation Assessment.

National Policy Statements – Paragraphs relevant to the Shipping and Navigation Assessment
NPS EN-3
Offshore Wind - Offshore wind impacts: navigation and shipping – Paragraphs 2.8.178 - 2.8.195
Offshore Wind - Navigation and shipping – Paragraph 2.8.326 - 2.8.340

2.12.1.3 The different procedures associated with the construction, operations and maintenance and decommissioning of the Morgan Generation Assets are considered within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

2.12.1.4 As required by NPS EN-3 paragraph 2.8.178, impact on vessel routeing is considered in section 7.9.3 and section 7.9.4 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) for ferries and other commercial shipping. Routeing in both typical and adverse weather conditions is considered.

2.12.1.5 In accordance with NPS EN-3 paragraph 2.8.179, the guidance and process followed in producing the Navigational Risk Assessment (NRA) are described within Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.6 As required by NPS EN-3 paragraph 2.8.180, a summary of key legislation and policy is contained in section 7.2 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.7 In accordance with NPS EN-3 paragraph 2.8.181, applied risk controls, including safety zones, are described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1). Additional risk control options are identified in section 7.14 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.8 As required by NPS EN-3 paragraph 2.8.182, within Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7), impact on vessel routing is considered in section 7.9.3 and section 7.9.4 for ferries and other commercial shipping. Impacts to small craft routeing are considered in section 7.9.10.

2.12.1.9 In accordance with NPS EN-3 paragraph 2.8.183, applied risk controls, including safety zones, are described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1). Additional risk control options are identified in section 7.14 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.10 As required by NPS EN-3 paragraph 2.8.184 and paragraph 2.8.185, A summary of the key issues raised during consultation activities, the consultee and the consultation activity undertaken is provided in Table 7.4 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.11 A Marine Navigation Engagement Forum (MNEF) was established for the three Irish Sea Round 4 offshore wind projects. Two hazard workshops were undertaken and is described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.12 In accordance with NPS EN-3 paragraph 2.8.186, impacts on shipborne and shorebased navigation, communication and positioning systems are described in section 7.9.9 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.13 As required by NPS EN-3 paragraph 2.8.187, within Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7), sea lane locations are presented in section 7.5 and impact on vessel routeing measures presented in section 7.9.2 and section 7.9.3.

2.12.1.14 In accordance with NPS EN-3 paragraph 2.8.188, datasets used to undertake assessment are described in section 7.4 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.15 As required by NPS EN-3 paragraph 2.8.189, the guidance and process followed in producing the NRA are described within Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.16 In accordance with NPS EN-3 paragraph 2.8.190, An NRA was undertaken in accordance with Marine Guidance Note (MGN) 654 and is contained within Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.17 Four 14 day vessel traffic surveys were conducted in compliance with the requirements under MGN 654, survey findings are presented in section 7.5 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1). This included a summer, winter and two top-up surveys.

2.12.1.18 The cumulative impacts of the Morgan Generation Assets on vessel routeing, collision and contact, in combination with multiple developments, are examined in section 7.11 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.19 As required by NPS EN-3 paragraphs 2.8.191 to 2.8.194, Applied risk controls, including safety zones, are described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1). Additional risk control options are identified in section 7.14 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.20 In accordance with NPS EN-3 paragraph 2.8.195, impacts on Search and Rescue (SAR) are described in section 7.9.6 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.21 As required by NPS EN-3 paragraphs 2.8.326 to 2.8.327, relevant International Maritime Organisation (IMO) routeing measures, including the Liverpool Bay Traffic Separation Scheme (TSS), are considered in relation to the Morgan Array Area in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.22 Sea lane locations are presented in section 7.5 and impact on vessel routeing measures presented in section 7.9.2 and section 7.9.3 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.23 In accordance with NPS EN-3 paragraph 2.8.328 to 2.8.30, within Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7), impacts on vessel routeing are considered in section 7.9.3 and section 7.9.4 for ferries and other commercial shipping. Routeing in both typical and adverse weather conditions is considered.

2.12.1.24 As required by NPS EN-3 paragraph 2.8.331, The guidance and process followed in producing the NRA is described within Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.25 In accordance with NPS EN-3 paragraph 2.8.332 and 2.8.333, Impacts on recreational craft are described in section 7.9.10 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.26 As required by NPS EN-3 paragraph 2.8.334, Relevant stakeholders have been consulted throughout, including the MCA. A summary of the key issues raised during consultation activities, the consultee and the consultation activity undertaken is provided in Table 7.4 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7).

2.12.1.27 The MNEF was established for the Morgan Generation Assets. Two hazard workshops were undertaken and described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1)

2.12.1.28 Impacts to navigation are described in section 7.10 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and the guidance and process for producing the NRA is set out in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.29 In accordance with NPS EN-3 paragraph 2.8.335, impacts to navigation are described in section 7.10 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and the guidance and process for producing the NRA is set out in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

2.12.1.30 As required by NPS EN-3 paragraphs 2.8.336 to 2.8.340, applied risk controls, including safety zones, are described in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1). Additional risk control options are identified in section 7.14 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).

Other Policy Considerations

2.12.1.31 Table 2.13 below lists other national policy considerations relevant to the shipping and navigation assessment.

Table 2.13: Summary of Other National Policy Considerations relevant to the Shipping and Navigation Assessment

North West Inshore and North West Offshore Coast Marine Plan
Ports, harbours and shipping: Policy NW-PS-1, NW-PS-2 and NW-PS-3

2.12.1.32 North West Inshore and North West Offshore Coast Marine Plan Policy NW-PS-1 Impacts to navigation are described in section 7.10 of Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) in particular, the impacts on commercial shipping routes and the approaches to ports/harbours are given in sections 7.9.2, 7.9.3 and 7.9.4 and in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (Document Reference F4.7.1).The assessment concludes that impacts to port and harbours at all

stages of development, including cumulative impacts would be either negligible or minor adverse, which is not significant in EIA terms and therefore the proposal would in compliance with Policy NW-PS-1.

2.12.1.33 Regarding Policy NW-PS-2 within Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7), sea lane locations are presented in section 7.5 and impact on vessel routeing measures presented in section 7.9.2. The assessment demonstrates that the Morgan Generation Assets does not encroach upon routeing schemes such as TSS therefore would be in compliance with Policy NW-PS-2.

2.12.1.34 In respect of Policy NW-PS-3 inter-array and interconnector cables within the Morgan Array Area would be in sufficiently deep water that any cable protection would not compromise the clearances required for deep draught vessels and does not significantly reduce under-keel clearance in compliance with Policy NW-PS-3.

Summary of Effects

2.12.1.35 Information on shipping and navigation within the shipping and navigation study area was collected through consultation with stakeholders, analysis of historical vessel traffic and incident data, hazard workshops and full bridge navigation simulations.

2.12.1.36 Table 7.41 presents a summary of the potential impacts, measures adopted as part of the project and residual effects in respect to shipping and navigation. The impacts assessed include, impacts to vessel routeing, impacts to port operations, impacts to navigational safety and impacts to emergency response.

2.12.1.37 Overall it is concluded that there will be the following significant effects arising from the Morgan Generation Assets during the construction, operations/ and maintenance or decommissioning phases:

- Impact on adverse weather routeing

2.12.1.38 Table 7.42 presents a summary of the potential cumulative impacts, mitigation measures and residual effects. The cumulative impacts assessed include, impacts to vessel routeing, impacts to port operations, impacts to navigational safety and impacts to emergency response. Overall, it is concluded that there will be the following significant cumulative effects from the Morgan Generation Assets alongside other projects/plans:

- Impact to commercial operators including strategic routes and lifeline ferries
- Impact on adverse weather routeing
- Impacts on vessel to vessel collision risk
- Impact on allision (contact) risk to vessels

2.12.1.39 No additional potential transboundary impacts have been identified in regard to effects of the Morgan Generation Assets.

Shipping and navigation conclusion

2.12.1.40 Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7) presents a summary of the potential impacts, measures adopted as part of the Morgan Generation Assets and residual effects in respect to shipping and navigation.

2.12.1.41 Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7) presents a summary of the potential cumulative impacts, mitigation measures and residual effects.

2.12.1.42 The construction, operations/maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs.

2.12.1.43 The Morgan Generation Assets has committed to further engagement with stakeholders and exploring what additional mitigations could be implemented to reduce these cumulative effects in collaboration with other Irish Sea developers.

2.12.1.44 All matters raised by the NPSs have and continue to be addressed in the Environmental Statement and supporting information.

Policy Compliance

2.12.1.45 With regard to shipping and navigation, the Morgan Generation Assets has been assessed as required by the relevant NPSs and relevant Marine policies.

2.12.1.46 It is concluded that there will be the following significant effects arising from the Morgan Generation Assets during the construction, operations maintenance or decommissioning phases:

- Impact on adverse weather routeing

2.12.1.47 The cumulative impacts assessed include, impacts to vessel routeing, impacts to port operations, impacts to navigational safety and impacts to emergency response. Overall, it is concluded that there will be the following significant cumulative effects from the Morgan Generation Assets alongside other projects/plans:

- Impact to commercial operators including strategic routes and lifeline ferries
- Impact on adverse weather routeing
- Impacts on vessel to vessel collision risk
- Impact on allision (contact) risk to vessels

2.12.1.48 A screening of transboundary impacts has been carried out and any potential for significant transboundary effects with regard to shipping and navigation from the Morgan Generation Assets upon the interests of other states has been assessed as part of the Environmental Statement. Each individual vessel may be internationally owned or operating between ports in different states. These impacts have been captured and assessed within the shipping and navigation chapter, Navigation Risk Assessment and CRNRA. No additional transboundary impacts are therefore anticipated.

2.12.1.49 Mitigation measures included in the Mitigation and Monitoring Schedule (Document Reference J6); Outline Offshore Operations and Maintenance Plan (Document reference J9) and the Outline Fisheries Liaison and Coexistence plan (Document Reference J10) seek to address and mitigate the identified likely significant effects.

2.12.1.50 Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-3 and with Policies NW-PS-1, NW-PS-2 and NW-PS-3 of the North West Inshore and North West Offshore Coast Marine Plan.

2.12.1.51 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the moderate potential effects on shipping and navigation, following proposed mitigation.

2.13 Marine archaeology and cultural heritage

2.13.1.1 This topic is assessed in Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

2.13.1.2 Table 2.14 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Marine Archaeology and cultural heritage. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.14: Summary of National Policy Statements relevant to the Marine Archaeology and cultural heritage assessment.

National Policy Statements – Paragraphs relevant to the Marine Archaeology and cultural heritage assessment
NPS EN-3
Offshore Wind – Impacts – Paragraph 2.8.104
Offshore Wind – Marine Historic Environment – Paragraph 2.8.171
Offshore Wind – Marine Historic Environment – Paragraph 2.8.176
Offshore Wind – Mitigation – Paragraph 2.8.253
Secretary of State Decision Making – Marine Historic Environment – Paragraph 2.8.325

2.13.1.3 As required by NPS EN-3 paragraph 2.8.104 Consultation with relevant statutory and non-statutory stakeholders has been carried out from the early stages of the Morgan Generation Assets and through the Archaeology and Heritage Engagement Forum (AHEF). See section 8.3 and Table 8.4 of Volume 2, Chapter 8 Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8), for further details.

2.13.1.4 In accordance with NPS EN-3 paragraph 2.8.171, a marine archaeology desk-based assessment and technical report has been produced which informs the archaeological assessment (see Volume 4, Annex 8.1: Marine archaeology technical report of the Environmental Statement (Document Reference F4.8.1). The archaeological review of site investigation data is included in section 8.4 of Volume 2, Chapter 8: Marine archaeology of the Environmental Statement (Document Reference F2.8) and in Volume 4, Annex 8.1: Marine archaeology technical report of the Environmental Statement (Document Reference F4.8.1).

2.13.1.5 As required by NPS EN-3 paragraph 2.8.176, the EIA has considered the potential adverse and beneficial impacts on the historic environment during each phase of the Morgan Generation Assets (see section 8.8 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8)).

2.13.1.6 In accordance with NPS EN-3 paragraph 2.8.253, Morgan Generation Assets will incorporate AEZs, where appropriate, as stated in the measures adopted as part of Morgan Generation Assets (see section 8.7 of Volume 2, Chapter 8: Marine

Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8)). AEZs are discussed further in the Outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (document reference J.14) to be submitted with the EIA.

2.13.1.7 As required by NPS EN-3 paragraph 2.8.325, measures adopted as part of the Morgan Generation Assets have been designed sensitively. Mitigation is primarily by avoidance and Morgan Generation Assets has been designed to avoid known sensitive receptors through provision of Archaeological Exclusion Zones (AEZs) and Temporary Archaeological Exclusion Zones (TAEZs) (as set out in section 8.7 Volume 2, Chapter 8 Marine Archaeology and cultural heritage in the ES). Any potential adverse effects have been assessed in section 8.8 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

Other Policy Considerations

2.13.1.8 Table 2.15 below lists other national policy considerations relevant to the Marine Archaeology and cultural heritage assessment.

Table 2.15: Summary of Other National Policy Considerations relevant to the Marine Archaeology and cultural heritage Assessment

Marine Policy Statement (MPS)
Detailed Considerations – Historic Environment – Paragraph 2.6.6.3
Detailed Considerations – Historic Environment – Paragraph 2.6.6.5
Detailed Considerations – Historic Environment – Paragraph 2.6.6.9
North West Inshore and North West Offshore Coast Marine Plan
Heritage assets: Policy NW-HER-1

2.13.1.9 As required by **Marine Policy Statement (MPS) paragraph 2.6.6.3**, the Environmental Statement has considered the significance of all known and potential heritage assets within the Morgan marine archaeology study area. This is considered within section 8.8 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

2.13.1.10 The measures adopted as part of Morgan Generation Assets including any future geophysical and geotechnical surveys undertaken will produce new archaeological data and understandings of the historic marine environment of the area. The results of these investigations will ultimately be made publicly available as discussed in section 8.7 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

2.13.1.11 In accordance with MPS paragraph 2.6.6.5, the Environmental Statement has considered the significance of all known and potential heritage assets within the Morgan marine archaeology study area as set out in section 8.8 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

2.13.1.12 Consultation to date with the relevant regulator and advisors is set out in Table 8.6 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).

2.13.1.13 As required by MPS paragraph 2.6.6.9, the measures adopted as part of Morgan Generation Assets including any future geophysical and geotechnical surveys undertaken will produce new archaeological data and understandings of the historic marine environment of the area. The results of these investigations will ultimately be made publicly available. This is discussed further in section 8.7 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). An Outline WSI (document reference J.14) has been prepared to support the EIA which sets out the high level mitigation strategy for approval by the regulator and advisors.

2.13.1.14 North West Inshore and North West Offshore Coast Marine Plan Policy NW-HER-1 the potential for harm to the significance of marine heritage assets by the Morgan Generation Assets has been assessed in section 8.8 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8), which includes the assessment of non-designated marine heritage assets identified within the Morgan marine archaeology study area. Mitigation measures have been adopted as part of the Morgan Generation Assets to protect the known archaeology assets and make provisions for those assets that are discovered during the development of Morgan Generation Assets in the Outline WSI and PAD (document reference J.14).

Summary of Effects

2.13.1.15 Information on Marine Archaeology and cultural heritage within the Morgan marine archaeology study area was collected through desktop review, site surveys and consultation.

2.13.1.16 Table 8.26 of Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8) presents a summary of the potential impacts, measures adopted as part of the project and residual effects in respect to Marine Archaeology and cultural heritage. The impacts assessed include:

- Sediment disturbance and deposition leading to indirect impacts on marine archaeology
- Direct damage to marine archaeology receptors during the construction, operations and maintenance and decommissioning phases
- Direct damage to deeply buried marine archaeology receptors during the construction phase
- Alteration of sediment transport regimes leading to indirect impacts to marine archaeology during the operations and maintenance phase of the Morgan Generation Assets
- Effects on Historic Seascape Character.

2.13.1.17 Overall, it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operation and maintenance or decommissioning phases.

2.13.1.18 Cumulative effects from sediment disturbance and deposition during all phases, direct damage to marine archaeology receptors during all phases, and alteration of sediment transport regimes during the operation and maintenance of the Morgan and Morecambe Offshore Wind Farms: Transmission Assets were assessed and predicted to result in effects of minor adverse significance (not significant in EIA terms) upon marine archaeology receptors.

2.13.1.19 No transboundary effects with regard to marine archaeology from the Morgan Generation Assets on the interests of other States were predicted.

Marine Archaeology and cultural heritage conclusion

2.13.1.20 Information on marine archaeology within the Morgan marine archaeology study area was collected through desktop review, site surveys and consultation.

2.13.1.21 Overall, it is concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operation/maintenance or decommissioning phases. No significant cumulative effects are expected from the Morgan Generation Assets, alongside other projects/plans.

2.13.1.22 No potential transboundary impacts have been identified in regard to effects of the Morgan Generation Assets.

2.13.1.23 The construction, operations /maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs.

2.13.1.24 All matters raised by the NPSs have been addressed in the Environmental Statement and supporting information.

Policy Compliance

2.13.1.25 With regard to Marine Archaeology and cultural heritage, the Morgan Generation Assets has been assessed as required by the relevant NPSs and relevant Marine policies.

2.13.1.26 The assessments carried out conclude that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases.

2.13.1.27 Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-3, the MPS and policy NW-HER-1 of the North West Inshore and North West Offshore Coast Marine Plan.

2.13.1.28 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the negligible potential effects on Marine Archaeology and cultural heritage.

2.14 Other sea users

2.14.1.1 This topic is assessed in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

2.14.1.2 Table 2.16 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to other sea users. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.16: Summary of National Policy Statements relevant to the Other Sea Users assessment.

National Policy Statements – Paragraphs relevant to the Other Sea Users assessment
NPS EN-3
Offshore Wind – Applicant Assessment – Paragraph 2.8.44
Offshore Wind – Impacts – Paragraph 2.8.196 - 2.8.198
Offshore Wind – Impacts – Paragraph 2.8.200 – 2.8.201

2.14.1.3 As required by NPS EN-3 paragraph 2.8.44, within Volume 2, Chapter 9: Other Sea users of the Environmental Statement (Document Reference F2.9), the baseline environment considering other offshore infrastructure and activities is presented in section 9.4.4. Consultation with potentially affected stakeholders has been carried out from the early stages of the Morgan Generation Assets and has continued throughout the pre-application consultation process. Details of this are presented in Table 9.4.

2.14.1.4 In accordance with NPS EN-3 paragraph 2.8.196 and 2.8.198, Within Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9), the potential impact on existing or permitted infrastructure or activities has been considered in section 9.4 and, where applicable, an assessment of their likely significance, considering each phase of the development process (i.e. construction, operations and maintenance, and decommissioning) is provided in section 9.9.

2.14.1.5 As required by NPS EN-1 paragraph 2.8.200 and 2.8.201, consultation with potentially affected stakeholders has been carried out from the early stages of the Morgan Generation Assets and has continued throughout the pre-application consultation process. Details of this are presented in Table 9.4 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

Other Policy Considerations

2.14.1.6 Table 2.17 below lists other national policy considerations relevant to the other sea users assessment.

Table 2.17: Summary of Other National Policy Considerations relevant to the Other Sea Users Assessment.

North West Inshore and North West Offshore Coast Marine Plan
Aggregates: Policy NW-AGG-1
Co-existence: Policy NW-CO-1
Cables: Policy NW-CAB-1 & NW-CAB-3
Oil and Gas: Policy NW-OG-1

2.14.1.7 NWCMP Policy NW-AGG-1 Figure 9.2 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9) shows there is no overlap between the Morgan Generation Assets and any marine aggregate extraction sites.

2.14.1.8 In compliance with Policy NW-CO-1, as described in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), the Morgan Generation Assets have been sited to minimise potential impacts on other sea users where possible.

2.14.1.9 Measures adopted as part of the Morgan Generation Assets (with relevance to other sea users) are contained in section 9.8, and an assessment of potential impacts is contained in section 9.9 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

2.14.1.10 Regarding Policy NW-CAB-1, cable burial is one of the measures adopted as part of the Morgan Generation Assets listed in section 9.8 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

2.14.1.11 With respect to Policy NW-CAB-3, cable crossing and proximity agreements are measures adopted as part of the Morgan Generation Assets listed in section 9.8 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

2.14.1.12 In compliance with Policy NW-OG-1, potential impacts on oil and gas activities are assessed in sections 9.9.3, 9.9.4 and 9.9.5 of Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9).

Summary of Effects

2.14.1.13 A number of potential impacts on other sea users, associated with the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets, were identified. The impacts assessed include:

- Displacement of recreational activities
- Reduction or restriction of other offshore energy activities
- Interference with the performance of Radar Early Warning Systems (REWS) located on oil and gas platforms
- Effect of rerouted traffic on REWS alarm rates.

2.14.1.14 With the mitigation measures adopted as part of the Morgan Generation Assets in place, these impacts result in effects which are of minor adverse significance and thus not significant in EIA terms.

2.14.1.15 The displacement of recreational activities was deemed to be of minor adverse for all phases of the Morgan Generation Assets. This conclusion was reached based on the distance from the Morgan Array Area to the nearest coastline (the Isle of Man, 22.2 km) and accordingly the low level of recreational activity within the Morgan Array Area. If required recreational vessels are able to alter their route. Notices to Mariners will be promulgated throughout all phases of the Morgan Generation Assets, advising of the location and nature of any works.

2.14.1.16 The cumulative effects assessment takes into account the impact associated with the Morgan Generation Assets together with other projects and plans. All cumulative impacts assessed were deemed to be of minor adverse significance and thus not significant in EIA terms.

2.14.1.17 No transboundary effects with regard to other sea users from the Morgan Generation Assets on the interests of other States were predicted.

2.14.1.18 The construction, operations/maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs.

2.14.1.19 All matters raised by the NPSs have been addressed in the Environmental Statement and supporting information.

Policy Compliance

2.14.1.20 With regard to other sea users, the Morgan Generation Assets has been assessed as required by the relevant NPSs and relevant Marine policies.

2.14.1.21 The assessments carried out conclude that there will only be minor adverse effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases which are not considered significant in EIA terms.

2.14.1.22 Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-3 and with policies NW-AGG-1; NW-CO-1; NW-CAB-1; NW-CAB-3 and NW-OG-1 of the North West Inshore and North West Offshore Coast Marine Plan.

2.14.1.23 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the negligible potential effects on other sea users.

2.15 Seascape, landscape and visual resources

2.15.1.1 This topic is assessed in Volume 2, Chapter 10: Seascape, Landscape and Visual Resources of the Environmental Statement (Document Reference F2.10).

2.15.1.2 Table 2.18 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Seascape, Landscape and Visual Resources. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.18: Summary of National Policy Statements relevant to the Seascape, Landscape and Visual Resources Assessment

National Policy Statements – Paragraphs relevant to the Seascape, Landscape and Visual Resources Assessment
NPS EN-1
Criteria for good design for Energy Infrastructure – Applicant Assessment – Paragraph 4.7.6
Landscape and Visual – Provision – Paragraph 5.10.4
Landscape and Visual – Provision – Paragraph 5.10.5
Landscape and Visual – Provisions – Paragraph 5.10.6
Landscape and Visual – Applicant Assessment– Paragraph 5.10.17
Landscape and Visual – Applicant Assessment– Paragraph 5.10.18
Landscape and Visual – Applicant Assessment– Paragraph 5.10.19
Landscape and Visual – Applicant Assessment– Paragraph 5.10.20
Landscape and Visual – Applicant Assessment– Paragraph 5.10.21
Landscape and Visual – Decision making – Paragraph 5.10.14
Landscape and Visual – Mitigation – Paragraph 5.10.26
Landscape and Visual – Decision making – Paragraph 5.10.34
Landscape and Visual – Decision making – Paragraph 5.10.35
Landscape and Visual – Decision making – Paragraph 5.10.36
Landscape and Visual – Decision making – Paragraph 5.10.37
NPS EN-3
Factors influencing site selection and design – National Designations – Paragraph 2.3.6
Offshore Wind – Consenting Process - Seascape and Visual effects – Paragraph 2.8.208
Offshore Wind – Consenting Process - Seascape and Visual effects – Paragraph 2.8.209
Offshore Wind – Consenting Process - Seascape and Visual effects – Paragraph 2.8.210
Offshore Wind – Consenting Process - Seascape and Visual effects – Paragraph 2.8.211
Offshore Wind – Consenting Process - Seascape and Visual effects – Paragraph 2.8.212
Secretary of State Decision Making – Seascape and Visual effects – Paragraph 2.8.349
Secretary of State Decision Making – Seascape and Visual effects – Paragraph 2.8.351
Secretary of State Decision Making – Seascape and Visual effects – Paragraph 2.8.352
Consenting Process – Applicant Assessment – Paragraphs 2.8.263 to 2.8.264

2.15.1.3 Impact Assessment Criteria is assessed in section 10.5.2 of Volume 2, Chapter 10 of the Environmental Statement and Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement, which complies with **NPS EN-1 paragraph 4.7.6.**

2.15.1.4 Impact Assessment Criteria is assessed in section 10.6 of Volume 2, Chapter 10 of the Environmental Statement and Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement; and Section 10.9: SLVIA

Assessment of significant effects, which complies with **NPS EN-1 Paragraphs 5.10.4, 5.10.5 and 5.10.6.**

2.15.1.5 The existing seascape and landscape character and assessments are described (reviewed in) Volume 4, Annex 10.2: Seascape and landscape character baseline technical report of the Environmental Statement, which complies with **NPS EN-1 Paragraph 5.10.17**

2.15.1.6 Relevant national and local planning policy used to inform the assessment is outlined in Volume 4, Annex 10.1: Seascape landscape and visual impact assessment legislation and planning policy context of the Environmental Statement, which complies with **Statement,N-1 Paragraph 5.10.17 and 5.10.8.**

2.15.1.7 The maximum design scenario is set out in Table 10.17 and assessment of effects on the seascape and landscape elements are assessed in section 10.8 and section 10.9 of Volume 2, Chapter 10 of the Environmental Statement, which complies with **NPS EN-1 Paragraph 5.10.19.**

2.15.1.8 Assessments of effects on seascape and landscape resources are assessed in section 10.8 of Volume 2, Chapter 10 of the Environmental Statement and the special qualities of nationally designated landscapes are assessed in Volume 4, Annex 10.5: International and nationally designated landscapes study, of the Environmental Statement, which complies with **NPS EN-1 Paragraph 5.10.20.**

2.15.1.9 Assessments of effects on visual resources are assessed in section 10.8.5 to 10.8.13 and Nighttime effects on visual receptors are assessed in section 10.8.14 of Volume 2, Chapter 10 of the Environmental Statement, which complies with **NPS EN-1 Paragraph 5.10.21.**

2.15.1.10 The Morgan Generation Assets is CNP Infrastructure. The Morgan Generation Assets will have no direct effects on National Parks or National Landscapes. The Morgan Generation Assets would be visible from the lake District National Park. This landscape has the potential to be indirectly affected. The effects on the special qualities of the Lake District National Park are considered in detail in Volume 4, Annex 10.5: Internationally and nationally designated landscapes study, of the Environmental Statement, which complies with **NPS EN-3 Paragraph 2.3.6.**

2.15.1.11 The methodology used to assess the effects of the Morgan Generation Assets, is set out in Volume 4, Annex 10.4: Seascape, landscape and visual impact assessment methodology, of this Environmental Statement and The assessment in Volume 2, Chapter 10 of the Environmental Statement is in proportion to the scale of the Morgan Generation Assets, which complies with **NPS EN-3 Paragraph 2.8.208.**

2.15.1.12 The Morgan Array will be visible from the shore on days with good visibility. Meteorological Office visibility data for the years 2012 to 2022 is set out in Volume 4, Annex 10.4: Seascape, landscape and visual impact methodology of the Environmental Statement, Night time impacts are assessed in section 10.8.14 of Volume 2, Chapter 10 of the Environmental Statement and the effects on the special qualities of designated landscapes are assessed in Volume 4, Annex 10.5: International and nationally designated landscapes study, of the Environmental Statement, which comply with **NPS EN-3 Paragraph 2.8.210.**

2.15.1.13 Photomontages and wirelines have been produced for representative viewpoints in Volume 4, Annex 10.6: Seascape and landscape visualisations of the Environmental Statement, which comply with **NPS EN-3 paragraph 2.8.200.**

2.15.1.14 The SLVIA has been undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (GLVIA3). The assessment of effects on

seascape and landscape resources and receptors is outlined in section 10.8.2 and section 10.8.3 and the effects on visual receptors is outlined in section 10.8.5 to 10.8.14 of Volume 2, Chapter 10 of the Environmental Statement.

2.15.1.15 The effects on the special qualities of designated landscapes are assessed in Volume 4, Annex 10.5: International and nationally designated landscapes study, of the Environmental Statement.

2.15.1.16 The methodology used to assess the effects on seascape, landscape and visual resources and receptors is set out in Volume 4, Annex 10.4: Seascape, landscape and visual impact assessment methodology.

2.15.1.17 A cumulative impact assessment has been undertaken and is presented in section 10.9 of Volume 2, Chapter 10 of the Environmental Statement, which complies with **NPS EN-3 Paragraph 2.8.212**.

2.15.1.18 The effects on visual receptors is assessed in section 10.8 of Volume 2, Chapter 10 of the Environmental Statement, which complies with NPS EN-1 Paragraph 5.10.14.

2.15.1.19 Given the dynamic nature of most of the visual receptors and the location of the project offshore, no additional measures are proposed specifically in relation to the location, scale or arrangement and layout of the wind turbines, which complies with **NPS EN-1 Paragraph 5.10.26.**

2.15.1.20 No elements of the Morgan Generation Assets are located within any designated landscapes. The effects on the special qualities of nationally designated landscapes are assessed in Volume 4, Annex 10.5: International and nationally designated landscape study, of the Environmental Statement, which complies with **NPS EN-1 Paragraph 5.10.34.**

2.15.1.21 The Maximum Design Scenario was used to identify potential impacts on seascape, landscape and visual resources and receptors (Table 10.17) and effects of the temporary and permanent elements of the offshore components of the project on seascape, landscape and visual receptors are considered within section 10.8 of Volume 2, Chapter 10 of the Environmental Statement, which comply with **NPS EN-1 paragraphs 5.10.35 and 5.10.36.**

2.15.1.22 See Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement for further detail on site selection criteria. The AfL dictates the area within which the Morgan Generation Assets has to be located. The boundary of the Array Area has been revised (reduced) to minimise effects on shipping and navigation, other sea users and to increase separation from landscape and visual resources and receptors. Given the dynamic nature of the majority of the visual receptors and the location of the Morgan Generation Assets no additional measures are proposed specifically in relation to the location or arrangement of the wind turbines, all of which comply with **NPS EN-1 Paragraph 5.10.37.**

2.15.1.23 The assessment of the Morgan Generation Assets has considered the likely significance of effects, considering each phase of the development process. The likely significance of effects is outlined in Volume 2, Chapter 10 of the Environmental Statement (refer to Section 10.13 for the summary of potential environmental effects), which complies with **NPS EN-3 Paragraph 2.8.349.**

2.15.1.24 The assessment of effects on seascape and landscape resources and receptors is outlined in section 10.8.2 and 10.8.3, the effects on visual receptors is outlined in section 10.8.5 to 10.8.13 of Volume 2, Chapter 10 of the Environmental Statement and the effects on the special qualities of designated landscapes are assessed in Volume 4, Annex 10.5: International and nationally designated landscapes study, of the

Environmental Statement, which comply with **NPS EN-3 Paragraphs 2.8.351 and 2.8.352.**

2.15.1.25 Alternatives of the Environmental Statement for details for further detail on site selection criteria and the AFL dictates the area within which the Morgan Generation Assets have to be located. The boundary of the Morgan Array Area has been revised (reduced) to minimise effects on shipping and navigation, other sea users and to increase separation from landscape and visual resources and receptors, all of which comply with **NPS EN-3 Paragraph 2.8.263.**

Other Policy Considerations

2.15.1.26 Table 2.19 below lists other national policy considerations relevant to the Seascape, Landscape and Visual Resources assessment.

Table 2.19: Summary of Other National Policy Considerations relevant to the Seascape, Landscape and Visual Resources Assessment.

Other Policy Considerations – Paragraphs relevant to Seascape, Landscape and Visual Resources Assessment.
UK Marine Policy Statement - Detailed Considerations – Seascape – Paragraph 2.6.5.1
UK Marine Policy Statement – Detailed Considerations – Issues for Consideration – Paragraphs 2.6.5.2
UK Marine Policy Statement – Detailed Considerations – Issues for Consideration – Paragraph 2.6.5.3
Welsh National Marine Plan – Designated Landscapes – Policy SOC_06
Welsh National Marine Plan – Seascapes – Policy SOC_07
Welsh National Marine Plan – Cumulative Effects – Policy GOV_01
Welsh National Marine Plan – Cross-border and plan compatibility – Policy GOV_02
Welsh National Marine Plan – Low carbon energy (supporting) wind - Policy ELC_01a
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy NW-CO-1
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy NW-REN-1
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy NW-REN-2
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy NW-REN-3
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy-NW-SCP-1
Northwest Inshore and Northwest Offshore Coast Marine Plans – Polciy NW-TR-1
Northwest Inshore and Northwest Offshore Coast Marine Plans – Policy NW-CBC
Isle of Man Government – Area Plan for the East 2020 - Landscape Proposal 1 - Broad landscape strategies
Isle of Man Government – Area Plan for the East 2020 - Landscape Proposal 8 - Douglas Bay
National Planning Policy Framework - Section 2 - Achieving sustainable development – Paragraph 11
National Planning Policy Framework - Section 15 – Conserving and enhancing the natural environment – Paragraph 180

2.15.1.27 Volume 2, Chapter 10 of the Environmental Statement considers both offshore and onshore seascape and landscape and visual resources and receptors, as defined both in the ELC and Guide to Best Practice in Seascape Assessment (Hill et al., 2001, INTERREG Report No. 5), which complies with **UK Marine Policy Statement Paragraph 2.6.5.1.**

2.15.1.28 Seascape landscape and visual resources and receptors are considered within Volume 2, Chapter 10 of the Environmental Statement. Historic seascape and the setting of historic assets are considered in Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement. The socio-economic effects of Morgan Generation Assets are considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement. All of the aforementioned chapters comply with **UK Marine Policy Statement Paragraph 2.6.5.2.**

2.15.1.29 Where available published seascape and landscape assessments have been used. Where not available, such as the outer Isle of Man territorial waters, baseline information from other chapters in the Environmental Statement have been used to characterise the seascape and establish seascape sensitivity, the methodology complies with **UK Marine Policy Statement Paragraph 2.6.5.3.**

2.15.1.30 No element of the Morgan Generation Assets lies within a nationally designated seascape or landscape. A 60 km SLVIA study area is identified for the assessment of effects on the special qualities of nationally and internationally designated landscapes. This is documented in Volume 4, Annex 10.5: International and nationally designated landscapes study of the Environmental Statement, which complies with **Welsh National Marine Plan Policy SOC_06.**

2.15.1.31 The assessment of the Morgan Generation Assets on seascape, landscape and visual resources and receptors is considered in section 10.8 and summarised in Table 10.21 of Volume 2, Chapter 10 of the Environmental Statement. There are limited opportunities for mitigating seascape or visual effects for the Morgan Generation Assets. However, Table 10.18 details those that are proposed for the Morgan Generation Assets, which complies with **Welsh National Marine Plan Policy SOC_07.**

2.15.1.32 Cumulative effects are considered in section 10.9 and summarised in Table 10.21 of Volume 2, Chapter 10 of the Environmental Statement, which comply with the requirements set out in **Welsh Marine National Plan Policy GOV_01.**

2.15.1.33 Cross-border and transboundary impacts are considered in section 10.11 of Volume 2, Chapter 10 of the Environmental Statement. For the Morgan Generation Assets, these consist of the different landmasses framing this part of the Irish Sea - the Isle of Man, Wales and England, as well as the territorial waters that lie within the 50 km SLVIA Study Area, which address the criteria set out in **Welsh National Marine Plan Policy GOC_02.**

2.15.1.34 For the purposes of the assessment of the Application the Applicant has considered Welsh National Marine Plan policy, however for the determination **Welsh National Marine Plan Policy ELC_01a** bears no weight on the planning balance as the Morgan Generation Assets is an offshore wind project located wholly in English territorial waters**.**

2.15.1.35 The Agreement for Lease (AfL) area is the result of the UK Offshore Wind Leasing Round 4 including the plan-level Habitat Regulations Assessment undertaken by The Crown Estate. Within that area and given other ‘hard’ constraints, there is little opportunity for relocating the Morgan Generation Assets. Other mitigation is considered in Table 10.16 of Volume 2, Chapter 10 of the Environmental Statement,

which is in accordance with **Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-CO-1.**

2.15.1.36 The socio-economic effects of the Morgan Generation Assets are considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement, which accord with Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-REN-1.

2.15.1.37 The Applicant entered into the AfL for the Morgan Generation Assets in 2022, which is in accordance with Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-REN-2.

2.15.1.38 Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement provides further detail on site selection criteria, which complies with Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-REN-3.

2.15.1.39 The assessment of potential impacts is set out within section 10.8 of Volume 2, Chapter 10 of the Environmental Statement. Measures adopted as part of the Morgan Generation Assets are set out within section 10.7 and a summary of potential effects is set out in section 10.13. The effects of Morgan Generation Assets on the Lake District National Park are documented in Volume 4, Annex 10.5: International and nationally designated landscapes study of the Environmental Statement and includes consideration of the Lake District National Park and the English Lake District World Heritage Site. The chapter stipulated provide basis for the Morgan Generation Assets to meet the requirements of Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-SCP-1.

2.15.1.40 The effects on tourism and recreation are considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement, which complies with the requirements of **Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-TR-1.**

2.15.1.41 Cross-border and transboundary impacts are considered in section 10.11 of Volume 2, Chapter 10 of the Environmental Statement. For Morgan Generation Assets, these are limited to the landmasses framing this part of the Irish Sea, namely England, the Isle of Man and Wales as well as the territorial waters that lie within the 50 km SLVIA Study Area, which complies with **Northwest Inshore and Northwest Offshore Coast Marine Plans Policy NW-CBC-1.**

2.15.1.42 There will be no direct effects on the landscape of the Isle of Man as a result of Morgan Generation Assets. Indirect and not significant effects on the character of the landscapes on the east coast will arise and these are outlined in Volume 2, Chapter 10 of the Environmental Statement, which meets the requirement set out in **Isle of Man Government – Area Plan for the East 2020 Landscape Proposal 1.**

2.15.1.43 The effects resulting from Morgan Generation Assets have been considered on the landscape of the Isle of Man and on viewers, including at Douglas Head. These are documented in Section 10.8.3 and the visual impact assessment (Section 10.8.5 to 10.8.13) of Volume 2, Chapter 10 of the Environmental Statement, which comply with the requirements set out in **Isle of Man Government – Area Plan for the East 2020 Landscape Proposal 8.**

Summary

Summary of Effects

2.15.1.44 Impacts will arise on seascape, landscape and visual resources during construction, operations/maintenance and decommissioning phases resulting from the following MDS components:

- 68 wind turbines
- Four OSPs
- Construction and service vessels/helicopters.

2.15.1.45 The Morgan Generation Assets would be located within the southwest part of English Marine Character Area (MCA) 38 Irish Sea South resulting in direct effects. The Morgan Generation Assets would result in very localised significant effects, which would reduce with increasing distance from the array. The impacts are within an area partly characterised by commercial shipping and ferries, static sea infrastructure and by several operational offshore wind farms, including a cluster of existing wind farms to the east-northeast of the Morgan Array Area (Northwest England cluster) and a cluster of existing offshore wind farms to the south of the Morgan Array Area (the North Wales cluster).

2.15.1.46 Regarding the area of offshore waters occupied by the Morgan Array Area, a significant, adverse seascape character effect would arise during the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets. These significant seascape effects would extend a modest distance from the Morgan Array Area across MCA 38 Irish Sea South (England) and the adjacent Isle of Man MCA 'A' and Welsh Seascape Sensitivity Zone (SSZ) 5. The extent of significant effects would be less during construction and decommissioning. The significant seascape effects predicted to arise during the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets would be localised. The Morgan Generation Assets would not result in significant effects on MCA 38, MCA A and SSZ 5 when considered as a whole.

2.15.1.47 The Morgan Generation Assets would not result in significant effects upon the landscape character of the SLVIA study area. The Morgan Generation Assets would be located offshore and as a result, the baseline landscape of the study area would not be directly affected. Indirect effects on landscape character would arise but are judged not to be significant. This is due to the distance to the Morgan Generation Assets at over 20 km at the closest point to land at the coastline of the Isle of Man between Douglas Head and Clay Head. The separation distance between these areas of coastal landscape and the Morgan Generation Assets is such that significant adverse effects on landscape character would not arise. Significant effects are not expected to arise on landscape character within England including the coastline of Cumbria and Lancashire. Significant effects are also not predicted for the elevated inland landscapes of the Isle of Man due to the distance of approximately 30 km from the Morgan Generation Assets.

2.15.1.48 The assessment considered the potential effects on the special qualities of the Lake District National Park and attributes of outstanding universal value of The English Lake District World Heritage Site (WHS). No significant effects are predicted during the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets on this nationally and internationally designated landscape in the SLVIA study area. The SLVIA concludes that the special qualities of this nationally

designated landscape and the attributes of outstanding universal value of the world heritage site would remain intact and the Morgan Generation Assets would not conflict with or compromise the reasons for the designations.

2.15.1.49 Moderate and not significant adverse visual effects (long term and reversible) are predicted during operations and maintenance of Morgan Generation Assets for people using Douglas promenade and other similar publicly accessible, seafront/shoreline locations on the Isle of Man's east coast where views of Morgan Generation Assets are available at distances ranging from 22.5 to 25 km. These locations include Douglas Promenade, Old Laxey and Douglas Head. Visual effects arising during construction and decommissioning would be lower, temporary, short term in duration and not significant.

2.15.1.50 Moderate and not significant visual effects would be experienced during operations and maintenance by users of the Raad ny Foillan Coastal Path on the Isle of Man's east coast and individuals at coastal settlements of Douglas and Laxey.

2.15.1.51 Users of ferries are expected to experience moderate to major adverse effects during the operations and maintenance phase where the ferries pass within or adjacent to the Morgan Array Area. At other points along the route farther away from the Morgan Array Area the magnitude of visual impact and the significance of the effect will be lower and not significant. Similarly recreational sailors may experience significant visual effects in close proximity to the Morgan wind turbines.

2.15.1.52 Significant cumulative effects on seascape, landscape and visual resources as a result of the Morgan Generation Assets in combination with other projects and plans are not anticipated to arise during the construction, operations/maintenance and decommissioning phases.

Policy Compliance

2.15.1.53 With regard to seascape and visual resources, the Morgan Generation Assets has been assessed as required by the relevant NPSs.

2.15.1.54 Those assessments conclude that the majority of the effects of the Morgan Generation Assets are considered to be not significant. Whilst Moderate and not significant adverse visual effects (long term and reversible) are predicted during operations and maintenance of Morgan Generation Assets for people using Douglas promenade and other similar publicly accessible, seafront/shoreline locations on the Isle of Man's east coast where views of Morgan Generation Assets are available at distances ranging from 22.5 to 25 km, these will not be permanent. Visual effects arising during construction and decommissioning would be lower, temporary, short term in duration and not significant. In any event, as confirmed by NPS EN-1 paragraph 3.3.63, the presumption in favour of consent for CNP infrastructure is not affected by these effects.

2.15.1.55 As demonstrated in the Environmental Statement it is considered that the Morgan Generation Assets accords with the requirements of NPS EN-1 and EN-3.

2.15.1.56 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on seascape, landscape and visual resources.

2.16 Aviation and radar

2.16.1.1 This topic is assessed in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

2.16.1.2 Table 2.20 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the aviation and radar assessments. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Assets have addressed the requirements of the relevant NPS paragraphs.

Table 2.20: Summary of National Policy Statements relevant to the Civil, Military Aviation and Defence Interests Assessment

National Policy Statements – Paragraphs relevant to the Civil, Military Aviation and Defence Interests Assessment
EN-1
Civil and Military Aviation and Defence Interests – Safeguarding – Paragraph 5.5.11
Civil and Military Aviation and Defence Interests – Safeguarding – Paragraph 5.5.19
Civil and Military Aviation and Defence Interests – Other Defence Interests – Paragraph 5.5.37
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.39
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.40
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.42
Civil and Military Aviation and Defence Interests – Applicant Assessment – Paragraph 5.5.43
Civil and Military Aviation and Defence Interests – Secretary of State Decision Making – Paragraph 5.5.565
EN-3
Offshore Wind – Applicant Assessment – Paragraph 2.8.50
Offshore Wind – Mitigation – Paragraph 2.8.240
Offshore Wind – Mitigation – Paragraph 2.8.261

2.16.1.3 The potential impacts of the Morgan Generation Assets during the Construction, operations and maintenance, and decommissioning phases have been assessed within the impact assessment section 11.9 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) as required by NPS EN-1 paragraph 5.5.37.

2.16.1.4 In accordance with NPS EN-1 paragraph 5.5.39 and NPS EN-3 paragraph 2.8.261 A summary of the consultation carried out specific to aviation and radar is provided in Table 11.4 Volume 2, Chapter 11 Aviation and Radar in the ES. A full record of consultation is provided in the Consultation Report (Document Reference E3). Consultation on mitigation principles is provided in Table 11.4 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

2.16.1.5 An assessment of the impact of the Morgan Generation Asset on the operation and safety of aerodromes has been completed as required by NPS EN-1 paragraph 5.5.11. Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1) (Appendix B, IFP assessment) considers

airport safeguarded surfaces. The impact of the Morgan Generation Assets on aircraft operations through the creation of physical obstacles is assessed in section 11.9.2 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11). Any necessary mitigation Measures adopted as part of the Morgan Generation Assets are included in section 11.9.3.7 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) in accordance with NPS EN-1 paragraph 5.5.43.

2.16.1.6 The potential impacts of the Morgan Generation Assets during the construction, operations and maintenance, and decommissioning phases have been assessed within the impact assessment section 11.9 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11). The assessment of aviation flight patterns are provided in Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1) (Appendix B, IFP assessment). Cumulative impacts are discussed within section 11.10 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) as required by NPS EN-1 paragraph 5.5.40 and NPS EN-3 paragraph 2.8.50.

2.16.1.7 In compliance with NPS EN-1 paragraph 5.5.42 all changes made during the pre-application period have been communicated to the relevant consultees as captured in Table 11.4 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11). On 19 September 2023, an announcement was made regarding refinements to the Morgan Generation Assets, including a reduction in the Morgan Array Area from the boundary presented in the PEIR and an increase in the minimum spacing between the wind turbines and maximum blade tip height. An electronic newsletter was distributed to the project's prescribed consultees (section 42 of the 2008 Act) via email, signposting to the websites for further information. The information was sent to specially selected key stakeholders a day in advance of the public announcement.

2.16.1.8 In accordance with NPS EN-1 5.5.19 Low flying is considered as part of the baseline in paragraph 11.5.1.4 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

2.16.1.9 Aviation lighting is considered as embedded mitigation and is discussed in Consultation on mitigation options presented within Table 11.4 and aviation lighting is discussed in Table 11.14 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11 as required by NPS EN-1 paragraph 5.5.55 and NPS **EN-3 paragraph 2.8.240**.

Summary of Effects

2.16.1.10 Information on aviation and radar within the aviation and radar study area was collected through desktop review and consultation.

2.16.1.11 Table 11.17 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) presents a summary of the potential impacts, measures adopted as part of the Morgan Generation Assets and residual effects in respect to aviation and radar. The impacts assessed include:

- Creation of physical obstacle to aircraft operations
- Wind turbines causing interference on civil and military PSR systems.

2.16.1.12 Overall, it is concluded that there will be the following significant effect arising from the Morgan Generation Assets during the operations and maintenance phase:

2.16.1.13 Wind turbines causing interference on civil and military PSR systems.

2.16.1.14 Table 11.18 of Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) presents a summary of the potential cumulative impacts, adopted measures and residual effects. The cumulative impacts assessed include:

- Creation of physical obstacle to aircraft operations
- Wind turbines causing interference on civil and military PSR systems.

2.16.1.15 Overall, it is concluded that there will be the following significant cumulative effect arising from the Morgan Generation Assets alongside other projects/plans:

- Wind turbines causing interference on civil and military PSR systems.

2.16.1.16 With further mitigation in place the effect is expected to be of minor adverse significance which is not significant in EIA terms. Mitigation is presented in mitigation is described in section 11.9.3Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) and included as part of the Mitigation and Monitoring Schedule (Document Reference J6).

Policy Compliance

2.16.1.17 As set out above, the aviation and radar assessments undertaken for the Morgan Generation Asset have met the requirements of NPS EN-1 and NPS EN-3 as all indentfied potential effects are of minor adverse significane and therefore no significant in EIA terms.

2.16.1.18 No potential transboundary impacts have been idenfitied in regard to effects of the Morgan Generation Asset in relation to aviation and radar matters as set out above and incorporating the measures which will be secured through a Requirement of the DCO, it is considered that the Morgan Generation Asset accords with NPS EN-1 and NPS EN-3.

2.16.1.19 The construction, operations /maintenance and decommissioning of the Morgan Generation Assets will be carried out in accordance with the relevant NPSs and other identified material planning policy matters. The environmental information and assessment carried out for the Morgan Generation Assets demonstrates that there is no conflict with any of the conditions set out by the NPSs.

2.16.1.20 All matters raised by the NPSs have been addressed in the Environmental Statement and supporting information.

2.16.1.21 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on civil and military aviation and defence interests.

2.17 Climate change

2.17.1.1 This topic is assessed in Volume 2, Chapter 12: Climate Changes of the Environmental Statement (Document Reference F2.12).

2.17.1.2 Table 2.21 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Climate Change. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.21: Summary of National Policy Statements relevant to the Climate Change Assessment

National Policy Statements – Paragraphs relevant to the Climate Change Assessment
NPS EN-1
Greenhouse Gas Emissions – Applicant Assessment – Paragraph 5.3.4
Greenhouse Gas Emissions – Mitigation – Paragraph 5.3.5
Climate Change Adaption and Resilience – Applicant Assessment – Paragraph 4.10.9
Climate Change Adaption and Resilience – Applicant Assessment – Paragraph 4.10.12
Greenhouse Gas Emissions – Decision Making – Paragraphs 2.3.3 and 2.3.4
Greenhouse Gas Emissions – Decision Making – Paragraphs 5.3.8 to 5.3.11
Greenhouse Gas Emissions – Decision Making – Paragraph 5.3.12
Climate Change Adaption and Resilience – Decision Making – Paragraph 4.10.13
Climate Change Adaption and Resilience – Decision Making – Paragraph 4.10.19
NPS EN-3
Climate Change and Adaption and Resilience – Offshore wind – Paragraph 2.4.8
Greenhouse Gas Emissions – Decision Making – Paragraphs 1.1.5 and 1.1.6 and Section 1.6

2.17.1.3 Section 12.9 provides an assessment of CO2e emissions and other relevant greenhouse gases of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.1: Technical greenhouse gas assessment of the Environmental Assessment. This includes consideration of whole life emissions (section 12.11) across: · construction including embodied carbon (section 12.9.2) and land use/seabed change (section 12.9.3); · operation and maintenance (section 12.9.5); and · decommissioning phases (section 12.9.4), which meet requirements set out **NPS EN-1 Paragraphs 5.3.4 and 5.3.11**

2.17.1.4 Mitigation measures (commitments) to reduce emissions associated with Morgan Generation Assets are detailed from Section 12.9 paragraph 12.9.3.13 of ES chapter 12, which meets the requirement set out in **NPS EN-1 Paragraph 5.3.5.**

2.17.1.5 Section 12.10 of ES chapter 12 provides an assessment of climate risk and resilience for the relevant elements of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.2: Climate change risk assessment of the Environmental Assessment, which accords with the requirements set out in **NPS EN-1 Paragraphs 4.10.9 and 4.10.12.**

2.17.1.6 There is no land based infrastructure with the Morgan Generation Assets and as such no assessment concerning onshore, land based infrastructure has been conducted. This chapter (section 12.10) provides an assessment of climate risk and resilience for the relevant elements of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.2: Climate change risk assessment of the Environmental Assessment, which accords with the requirements stipulated in **NPS EN-3 Paragraph 2.4.8.**

2.17.1.7 Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement, addresses the provisions set out in **NPS EN-1 Paragraphs 2.3.3 and 2.3.4.**

2.17.1.8 Section 12.9 ES Chapter 12 provides an assessment of CO2e emissions and other relevant greenhouse gases of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.1: Technical greenhouse gas assessment of the Environmental Assessment. This includes consideration of whole life emissions (section 12.11) across: · construction including embodied carbon (section 12.9.2) and land use/seabed change (section 12.9.3); · operation and maintenance (section 12.9.5); and · decommissioning phases (section 12.9.4), which addresses the provisions as set out in **NPS EN-1 Paragraphs 5.3.8 to 5.3.12.**

2.17.1.9 ES Chapter 12 (section 12.10) provides an assessment of climate risk and resilience for the relevant elements of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.2: Climate change risk assessment of the Environmental Assessment, accords with the provisions provided in **NPS EN-1 Paragraph 4.10.13.**

2.17.1.10 ES Chapter 12 (section 12.10) provides an assessment of climate risk and resilience for the relevant elements of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.2: Climate change risk assessment of the Environmental Assessment, meets the provisions of **NPS EN-1 Paragraph 4.10.19.**

2.17.1.11 Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement, addresses the provisions set out in **NPS EN-3 Paragraphs 1.1.5 and 1.1.6** along with the criteria set out in **Section 1.6 of NPS EN-3.**

Other Policy Considerations

2.17.1.12 Table 2.22 below lists other national policy considerations relevant to the climate change assessment.

Table 2.22: Summary of Other National Policy Considerations relevant to the Climate Change Assessment.

National Planning Policy Framework – Section 14 – Paragraphs 157, 158 and 159
Climate Change Act 2008 (as amended) - Section 1 – Provision 1
Clean Growth Strategy 2017 (Updated April 2018) - Policies 33, 35 and 36
Energy White Paper: Powering Our Net Zero Future 2020
National Infrastructure Strategy 2020
Net Zero Strategy: Build Back Greener 2021 (Updated April 2022)
British Energy Security Strategy, 2022
North West Inshore and North West Offshore Marine Plans – NW-REN-1
North West Inshore and North West Offshore Marine Plans – NW-REN-2
North West Inshore and North West Offshore Marine Plans – NW-REN-3
North West Inshore and North West Offshore Marine Plans – NW-CC-2
North West Inshore and North West Offshore Marine Plans – NW-CC-3

2.17.1.13 ES Chapter 12 and the assessment (section 12.9) presents the likely contribution of the Morgan Generation Assets to decarbonising the UK electricity Grid and transitioning towards a low carbon economy and section 12.10 provides an assessment of climate risk and resilience for the relevant elements of the Morgan Generation Assets and draws on information provided in Volume 4: Annex 12.1: Technical greenhouse gas assessment of the Environmental Assessment., which meet the requirements set out in **NPPF Paragraphs 157 to 159.**

2.17.1.14 An assessment of CO2e emissions and other relevant greenhouse gases of the Morgan Generation Assets is provided in section 12.9. A detailed assessment is provided within Volume 4, Annex 12.1 Technical greenhouse gas assessment of the Environmental Statement, which accords with the **Climate Change Act 2008 (as amended), Clean Growth Strategy 2017 (updated April 2018), Energy White Paper: Powering Our Net Zero Future 2020, National Infrastructure Strategy 2020, Net Zero Strategy: Build Back Greener 2021 (updated April 2022), and British Energy Security 2022.**

2.17.1.15 Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement, addresses the provisions and requirements set out in **North West Inshore and North West Offshore Marine Plan Policies NW-REN-1, NW-REN-2 and NW-REN 3.**

2.17.1.16 A climate risk assessment (Volume 4, Annex 12.2: Climate change risk assessment of the Environmental Statement) has been carried out to assess the projects resilience to likely changes to the climate. The assessment of climate change risk is presented in section 12.10 of ES Chapter 12, which meets the requirements set out in **North West Inshore and North West Offshore Marine Plans Policy NW-CC-2.**

2.17.1.17 The assessment (section 12.9) of ES chapter 12 presents the likely significant effects on climate change and the proposed mitigation that would avoid, minimise or otherwise mitigate, which accords with the requirements set out in **North West Inshore and North West Offshore Marine Plans Policy NW-CC-3.**

Summary of effects

2.17.1.18 Table 12.21 of Volume 2, Chapter 12 of the Environmental Assessment sets out a summary of potential environmental effects, mitigation and monitoring during the construction, operation and decommissioning period of the Morgan Generation Assets. The impacts assessed in the table are set out below:

- The impact of GHG emissions from land use change – during construction operations and decommissioning. Magnitude of impact assessed to be negligible for construction, operation and decommissioning phases.
- The impact of GHG emissions from the manufacturing and installation of the Morgan Generation Assets and consumption of materials. Magnitude of impact is assessed to be 1,927,452 tCO2e with minor adverse (not significant) residual effects.
- The impact of GHG emissions from the decommissioning works and recovery or disposal of materials during decommissioning. Magnitude of impact assessed to be 53,718 tCO2e with minor adverse (not significant) residual effects.
- The impact of GHG emissions arising from the consumption of materials and activates to facilitate the operations and maintenance of the Morgan Generation Assets and estimated abatement of UK Grid emissions. Magnitude of impact

assessed to be 2,305,986 tCO2e avoided emissions with beneficial (significant) residual effects.

- Impact of effects of Climate Change. Magnitude of impact assessed not applicable in terms of Climate Change, with negligible (not significant) residual effects.

2.17.1.19 Table 12.22 of Volume 2, Chapter 12 of the Environmental Assessment sets out a summary of potential cumulative environmental effects, mitigation and monitoring during the construction, operation and decommissioning of Morgan Generation Assets.

2.17.1.20 Table 12.22 sets out two scenarios based on Magnitude of Impact for construction, operation and decommissioning phases, as set out below:

- Scenario 1 – Magnitude of Impact assessed to be 1,225, 537 to -49,923,966 tCO_2e with beneficial residual effects.
- Scenario 2 – Magnitude of Impact assessed to be 773,069 to -86,108,442 tCO_2e with beneficial residual effects.

Policy Compliance

2.17.1.21 In terms of climate change, the Morgan Generation Assets has been assessed as required by the NPS EN-1, EN-3 and EN-5 and has taken into account the climate change considerations set out in the North West Inshore and North West Offshore Marine Plan.

2.17.1.22 Subject to the measures proposed as part of the Morgan Generation Assets, the assessment has confirmed that no significant adverse effects will occur to the Morgan Generation Assets as a result of climate change.

2.17.1.23 However, in terms of benefits, the Morgan Generation Assets would enable the use of excess renewable electricity (avoiding generation curtailment) and the displacement of fossil fuels which would be a positive GHG effect and when considering the avoided emissions, in addition to operations and maintenance emissions, the effect results in the order of approximately 2,305,986 tCO2e savings by 2064. This would be a significant beneficial effect.

2.17.1.24 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on climate change.

2.18 Socio-economic impacts

2.18.1.1 This topic is assessed in Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13).

2.18.1.2 Table 2.23 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the socio-economic assessment. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how the Morgan Generation Asset has addressed the requirements of the relevant NPS paragraphs.

Table 2.23: Summary of National Policy Statements relevant to the Socio-Economic Assessment

National Policy Statements – Paragraphs relevant to the Socio-Economic Assessment
EN-1
Assessment Principles – Environmental Principles – Paragraphs 4.2.4
Assessment Principles – Environmental Principles – Paragraphs 4.2.5
Assessment Principles – Application Assessment – Paragraphs 4.2.12
Socio Economic Impacts – Applicants Assessments – Paragraphs 5.13.2 – 5.13.7

2.18.1.3 As per paragraph 13.1.1.6 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), economic and social impacts are assessed within their own category. Potential economic impacts are estimated within Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement, covering employment and Gross Value Added (GVA) impacts and the potential associated impacts on local employment opportunities. Potential social impacts are estimated within Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement, covering potential workforce on housing, accommodation and population, in compliance with NPS EN-1 paragraph 4.3.4.

2.18.1.4 NPS EN-1 Paragraph 4.3.5 recognises the ES should cover environmental, social and economic effect effects arising from pre-construction, construction and operation and decommissioning of a project, so accordingly potential impacts during project development i.e. pre-construction, are included within the economic impact estimates presented in Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement. Potential economic and social impacts during construction, operation and maintenance, and decommissioning phases are presented in Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement. Effects resulting from potential economic and social impacts are assessed within section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13).

2.18.1.5 The ‘most likely’ (current capacity) and ‘worst case’ (low) scenarios have been considered in the assessment of both economic and social effects within section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13). Section 13.7 provides further detail on how the ‘most likely’ and ‘worst case’ scenarios have been considered for the topic of socio-economics, in compliance with NPS EN-1 Paragraph 4.3.12.

2.18.1.6 Economic and social impacts are assessed within Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement in accordance with NPS EN-1 Paragraph 5.13.2.

2.18.1.7 As required by NPS EN-1 Paragraph 5.13.3 Stakeholder consultation (non-statutory) undertaken for the topic of socio-economics during preparation of the PEIR invited all potentially relevant local authorities to participate as set out in section 13.3 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13). Statutory (Planning Act 2008, Ss42) consultation on the PEIR has provided all relevant statutory stakeholders with the opportunity to provide input to the application.

2.18.1.8 Potential economic impacts are estimated within Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement, covering employment and GVA impacts and the potential associated impacts on local employment opportunities and the sustainability of these roles (temporary/permanent, short/long term). This includes an estimate of potential direct, indirect (i.e. supply chain) and induced (i.e. household expenditure) economic impacts.

2.18.1.9 The Applicant has considered the provision of visitor facilities and concluded the inclusion of such facilities as part of the Morgan Generation Assets is not appropriate.

2.18.1.10 Potential cumulative effects associated with other projects are assessed within section 13.11 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13) in compliance with NPS EN-1 Paragraphs 5.13.4.

2.18.1.11 Potential social impacts and effects on tourism are assessed within section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), which includes consideration of how visual impacts may have an indirect impact on tourism. As accounted for by paragraphs 4.2.11 to 4.2.12 of NPS EN-1, there is currently insufficient information at this stage of the application to demonstrate consideration of local suppliers within the supply chain in compliance with NPS EN-1 paragraphs 5.13.4 and 5.13.6.

2.18.1.12 Potential social impacts are estimated within Volume 4, Annex 13.1: Socio-economics technical impact report of the Environmental Statement, covering potential workforce on housing, accommodation and population (including local services). Effects associated with potential social impacts are assessed within section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13). The Applicant has considered the development of an accommodation strategy. With reference to the assessment of potential workforce migration impacts assessed within subsection 13.9.4 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), negligible impacts are identified during the construction and operations and maintenance phases. As a result, an accommodation strategy is not appropriate, in compliance with NPS EN-1 paragraphs 5.13.4 and 5.13.7.

2.18.1.13 Existing baseline conditions within relevant national and sub-national geographies are set out within section 13.4 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13) and local planning policies – and how the Morgan Generation Assets interacts with these are set out within section 13.2 according with EN-1 Paragraphs 5.13.5.

2.18.1.14 The Applicant has committed to the provision of an Outline Skills and Employment Plan (document reference J-24) which will be included as a requirement of the draft DCO application. This document will be published following the consenting process and adopted by the Applicant to help develop and support the economic benefits associated with the Morgan Generation Assets in relation to skills and employment within the offshore wind sector. The provision of a Skills and Employment Plan/Strategy in the manner complies with NPS EN-1 paragraph 5.13.12.

2.18.1.15 The significance of effects associated with potential economic impacts (employment and GVA) are assessed within section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), according to existing baseline conditions, which includes consideration of the offshore wind sector in section 13.4.

Other Policy Considerations

2.18.1.16 Table 2.24 below lists other national policy considerations relevant to the socio-economic assessment.

Table 2.24: Summary of Other National Policy Considerations relevant to the Socio-economic Impact Assessment

Socio-economic North West Inshore and North West Offshore Marine Plan Provision
Renewables - NW-REN-1
Employment - NW-EMP-1
Tourism - NW-TR-1
Cumulative Effects - NW-CE-1
Infrastructure- NW-INF-1

2.18.1.17 Policy NW-REN-1 supports proposals for the provision of renewable energy technologies and associated supply chains. Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), which apply throughout the offshore wind supply chain.

2.18.1.18 Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), at regional and national levels.

2.18.1.19 The potential impact on economic receptors including employment, GVA and supply chain demand is assessed for its significance in section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), together with the significance of the potential impact of increased employment opportunities, in accordance with NW-EMP-1.

2.18.1.20 The potential impacts on tourism and recreation is assessed for its significance in section 13.9 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13). This assessment is informed by: Volume 2, Chapter 8: Seascape and Visual Resources and Volume 2, Chapter 10: Other Sea Users of the Environmental Statement, in compliance with NW-TR-1.

2.18.1.21 Policy NW-CE-1 enforces proposals with adverse cumulative effects with other existing, authorised or reasonably foreseeable proposals must demonstrate they will, in order of preference: avoid; minimise; mitigate. In compliance with this section 13.11 of Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13), cumulative effects assessments, considers the potential cumulative impacts of relevant major projects.

2.18.1.22 Policy NW-INF-1 supports for appropriate marine infrastructure which facilitates land-based activities, or land-based infrastructure which facilitates marine activities, as such Volume 4, Annex 23.1: Socio-economics technical impact report of the Environmental Statement provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), which apply throughout the offshore wind supply chain.

Summary of Effects

2.18.1.23 Table 13.94 of Volume 2, Chapter 13: Socio-Economic of the Environmental Statement (Document Reference F2.13) presents a summary of the potential impacts and residual effects in respect to socio-economics across the study area identified for this project. The impacts assessed include:

2.18.1.24 The potential impact on economic receptors including employment and GVA;

- The potential impact of increased employment opportunities for local residents;
- The potential impact on population, housing and accommodation;
- The potential impact on tourism.

2.18.1.25 Table 13.96 to Table 13.99 of Volume 2, Chapter 13: Socio-Economic of the Environmental Statement (Document Reference F2.13) present a summary of the potential cumulative socio-economic impacts, mitigation measures and residual effects.

2.18.1.26 If a port on the coast of North Wales or North West England is selected as the base for the construction, operation and maintenance or decommissioning phases of the Morgan Generation Assets:

2.18.1.27 The beneficial effect on economic receptors in that region, including employment, GVA and job opportunities for local residents, is likely to be not significant in EIA terms. Potential effects in North Wales on employment and GVA have the potential to be of moderate (beneficial) significance during the operation and maintenance phase, which is significant in EIA terms.

2.18.1.28 The beneficial effect on social receptors in that region, including demand for housing, accommodation and local services, is likely to be not significant in EIA terms. Potential effects in North Wales on demand for housing, accommodation and local services have the potential to be of moderate (beneficial) significance during the construction phase, which is significant in EIA terms.

2.18.1.29 Cumulative effects with other plans and projects were assessed and predicted as likely to result in no adverse change to the levels of significance assessed when considering the Morgan Generation Assets in isolation. Cumulative effects with other plans are anticipated to enhance beneficial effects including supporting employment, GVA, and supply chain demand, and increasing employment opportunities for residents.

2.18.1.30 No transboundary effects with regard to socio-economics from the Morgan Generation Assets on the interest of other States have been predicted.

2.18.1.31 The tourism sector is an important sector within the relevant policy environments, providing jobs for local residents and contributing to economic output.

2.18.1.32 The assessment concludes that, during the construction, operation and maintenance, and decommissioning phases, potential adverse effects on tourism are likely to be not significant in EIA terms.

2.18.1.33 Cumulative effects with other plans and projects were assessed and predicted as likely to result in no adverse change to the levels of significance assessed when considering the Morgan Generation Assets in isolation.

2.18.1.34 The Isle of Man economy can be characterised as a service dominated economy. The day-to-day operations of the service economy and public services are not dependant on the movement of freight and passengers, therefore a large proportion of the Isle of Man economy (90% of GDP, 71% of resident employment) have limited dependency

on lifeline ferry services. The day-to-day operations of the retail and wholesale, construction and manufacturing sectors are heavily reliant on the movement of freight. The visitor and leisure economy is highly reliant on the movement of passengers. These sectors are highly dependent on lifeline ferry services.

2.18.1.35 The assessment concludes that, during the construction, operation and maintenance and decommissioning phases, the adverse effect on socio-economic conditions in the Isle of Man is likely to be not significant in EIA terms.

2.18.1.36 Cumulative effects with other plans and projects were assessed and predicted as likely to result in no adverse change to the levels of significance assessed when considering the Morgan Generation Assets in isolation.

2.18.1.37 No transboundary effects from the Morgan Generation Assets on the interest of other States have been predicted.

Policy Compliance

2.18.1.38 The socio-economics assessment into the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets have identified a number of effects, all of which are considered to be beneficial.

2.18.1.39 The assessment has taken into consideration the measures within the Outline Skills and Employment Plan (Document Reference J8) which sets out opportunities for engagement to enable local workers and training providers to prepare for anticipated employment opportunities associated with the Morgan Generation Assets.

2.18.1.40 There are considered to be beneficial effects on population, housing and accommodation in north Wales during construction of the Morgan Generation Assets and on economic receptors, including employment and GVA in north Wales during the operations and maintenance phase of the project.

2.18.1.41 The assessment concludes that, during the construction, operation and maintenance and decommissioning phases, the adverse effect on socio-economic conditions in the Isle of Man is likely to be not significant in EIA terms.

2.18.1.42 Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-1 and with Policies NW-REN-1, NW-EMP-1, NW-TR-1, NW-CE-1 and NW-INF-1 of the North West Inshore and North West Offshore Coast Marine Plan.

2.18.1.43 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential beneficial effects on socio-economics.

2.19 Human health

2.19.1.1 This topic is assessed in Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14).

2.19.1.2 Table 2.25 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to the human health assessments. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.25: Summary of National Policy Statements relevant to the Human Health Assessment.

National Policy Statements – Paragraphs relevant to the Human Health Assessment
EN-1
Environmental Effects/Considerations – Paragraph 4.3.4
Health – Paragraph 4.4.1 – 4.4.6
Noise and Vibration – Paragraph 5.12.1 and 5.12.6
Water Quality and Resources – Paragraph 5.16.2

2.19.1.3 As required by NPS EN-1 paragraphs 4.3.4 employment is considered within Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), informed by Volume 2, Chapter 13: Socio-economics and community of the Environmental Statement. Well-being is an integral consideration throughout Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), reflecting that the World Health Organisation (WHO) define health in terms of states of wellbeing.

2.19.1.4 Within Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), the potential for employment and upskilling is covered in sections 14.8.2, and 14.8.4. The potential for effects relating to healthy lifestyles and safe and cohesive communities are covered in section 14.6.2 and effects on wellbeing and equality are inherent to all the assessments in section 14.8.

2.19.1.5 The effects to population health are considered in Section 19.8 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14). For example, benefits of access to energy are covered in Section 14.8.6 whilst the potential for adverse effects are covered in Sections 14.8.2, 14.8.3 and 14.8.4 and cumulative effects to population health are considered in Section 14. Together these meet the requirements of NPS EN-1 paragraphs 4.4.1; 4.4.4 and 4.4.5.

2.19.1.6 Given the Morgan Generation Assets are remote to human health receptors the main pathway is water pollution, which is considered within section 14.6.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) and informed by Volume 2, Chapter 7: Benthic subtidal ecology of the Environmental Statement.

2.19.1.7 Given the project's ports, and thus localised receptors, have not been identified at this stage, there is not a specific assessment at PEIR. The assumption is however that ports would operate within their consented levels of activity or would apply for planning permission or additional permits, e.g. discharges to water, if they required additional approvals. Such consents would be separate from this application, so are not included within the scope of this assessment.

2.19.1.8 Port expansion is not part of the scheme being proposed. Any potential environmental effects are expected to be considered in accordance with any consents and permits that may be required by the ports themselves in compliance with NPS EN-1 paragraph 4.4.2.

2.19.1.9 Given the Morgan Generation Assets are remote to human health receptors the main pathway is potential effects to health and other services on the Isle of Man should offshore transport be disrupted. This is considered within section 14.9.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference

F2.14). This also includes consideration of the socio-economic assessment in order to consider indirect health impacts, for example access to key public services, as required by NPS EN-1 paragraph 4.4.3.

2.19.1.10 In accordance with NPS EN-1 paragraph 4.4.6, the potential for differential effects to vulnerable groups is considered in section 14.6.3 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14). Measures adopted as part of the Morgan Generation Assets are set out in section 14.8, and further mitigation and enhancement measures are discussed within each health determinant in section 14.9 of the same document.

2.19.1.11 To comply with the requirements of NPS EN-1 paragraph 5.12 and 5.12.6, the effects to population health due to noise are considered in section 14.4.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), whilst section 4.11 considers differential effects to vulnerable groups.

2.19.1.12 Finally, potential health effects relating to water are considered in section 14.4.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), and informed by Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement, to comply with NPS EN-1 Paragraph 5.16.2.

Other Policy Considerations

2.19.1.13 Table 2.26 below lists other national policy considerations relevant to the Human Health Assessment.

Table 2.26: Summary of Other National Policy Considerations relevant to the Human Health Assessment

NPPF– Policies relevant to the Human Health Assessment
Human Health - Paragraph 96

2.19.1.14 Table 2.27 below lists other local policy considerations relevant to the human health assessment.

Table 2.27: Summary of Other Local Policy Considerations relevant to the Human Health Assessment

North West Inshore and North West Offshore Marine Plan – Policies relevant to the Human Health Assessment
Water Quality – NW-WQ-1
Fisheries – NW-FISH-2
Seascape and Landscape - NW-SCP-1
Coexistence - NW-CO-1
Employment - NW-EMP-1
Renewables - NW-REN-1
Air Quality - NW-AIR-1
Socioeconomics - NW-SOC-1
Tourism - NW-TR-1

2.19.1.15 Regarding compliance with Paragraph 96 of the NPPF, the potential effects to population health relating to community identity, culture, resilience and influence for the regional population of northwest England are considered in section 14.9.3 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14). It identifies that effects are largely linked to the proportion of people who have expectations that their community or way of life would be changed to a large degree, positively or negatively, by visual change caused by the Morgan Generation Assets and concludes that there are expected to be both minor adverse and minor beneficial effects, which is not significant in EIA terms.

2.19.1.16 When assessing Morgan Generation Assets against the relevant Human Health policies contained within the NWCMP, water quality effects of the Morgan Generation Assets to population health are discussed in section 14.4.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) to address the requirements of Policy NW-WQ-1.

2.19.1.17 Economic effects that could influence population health are discussed in section 14.9.2 (in relation to access) and section 14.9.4 (in relation to any adverse economic impacts) of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) in line with Policies NW-FISH-2; NW-EMP-1; NW-SOC-1 and NW-TR-1

2.19.1.18 In compliance with Policy NW-SCP-1, visual effects that could influence population health are discussed in section 14.9.3 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14).

2.19.1.19 Sea transport access between the Isle of Man and the mainland that could affect population health is discussed in section 14.9.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) and it is in line with the requirements of Policy NW-CO-1.

2.19.1.20 Within Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), the renewable energy benefits of the Morgan Generation Assets to population health are discussed in section 14.9.6 and the population health benefits of renewable energy for reduction of greenhouse gas emissions are discussed in section 14.9.5 which comply with the requirements of Polices NW-REN-1 and NW-AIR-1.

Summary of Effects

2.19.1.21 Information on human health within the human health study area was informed by a review of relevant public health evidence sources, including scientific literature, baseline data, health policy, local health priorities and health protection standards with reference to corresponding chapters as set out in paragraph 14.1.1.4 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14).

2.19.1.22 The Morgan Generation Assets will potentially have beneficial and adverse health effects. These are summarised in Table 14.24 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14). It can be concluded that:

2.19.1.23 As set out in section 14.9.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), impacts on transport modes, access and connections in relation to commercial operators including strategic routes and lifeline ferries to the Isle of Man will have a minor adverse effect for population

health, which is not significant in EIA terms. Disruption of medical hand other health related deliveries and trips is not expected on a scale to affect public health.

2.19.1.24 As set out in section 14.9.3 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), community identity, culture, resilience and influence in relation to visual impacts of the wind turbines will have a minor adverse and minor beneficial effect which is not significant in EIA terms.

2.19.1.25 As set out in section 14.9.4 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), employment and income in relation to loss or restricted access to commercial fishing grounds will have a minor adverse effect for population health, which is not significant in EIA terms.

2.19.1.26 As set out in section 14.9.5 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), climate change and adaptation in relation to renewable energy generation and subsequent reduced greenhouse gas emissions will have a minor beneficial effect for population health, which is not significant in EIA terms.

2.19.1.27 As set out in section 14.9.6 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), wider societal infrastructure and resources in relation to improved energy security will have a moderate beneficial effect for population health, which is significant in EIA terms.

2.19.1.28 Table 14.24 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14), presents a summary of potential effects, monitoring and mitigation. Overall, it is concluded that there will be no significant adverse effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases. Public health benefits in relation to climate change (not significant) and energy security (significant) are expected for population health.

2.19.1.29 Table 14.25 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) presents a summary of the potential cumulative impacts, mitigation measures and residual effects. Overall, it is concluded that there will be the following cumulative effects from the Morgan Generation Assets alongside other projects/plans:

- A moderate adverse cumulative effect for transport modes, access and connections in relation to collision and allision risk when including the effects of the Mooir Vannin Offshore Wind Farm within the Cumulative Effect Assessment
- Minor adverse and minor beneficial cumulative effects relating to community identity influences on population health
- Minor adverse and minor beneficial cumulative effect relating to employment and income influences on population health
- A minor beneficial cumulative effect related to climate change and public health
- A moderate beneficial cumulative effect for wider societal infrastructure and resources.

2.19.1.30 No potential transboundary impacts for population health have been identified in regard to effects of the Morgan Generation Assets.

Policy Compliance

2.19.1.31 The presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the potential effects on human health. Accordingly, it has been demonstrated that Morgan Generation Assets accords with the requirements of NPS EN-1 and EN-3, with Paragraph 96 of the NPPF and with Policies NW-WQ-1, NW-FISH-2; NW-SCP-1; NW-CO-1; NW-EMP-1; NW-REN-1; NW-AIR-1, NW-SOC-1 and NW-TR-1 of the North West Inshore and North West Offshore Coast Marine Plan.

2.20 Inter-related Effects

2.20.1.1 This topic is assessed in Volume 2, Chapter 15: Inter-related Effects of the Environmental Statement (Document Reference F2.15).

2.20.1.2 Table 2.28 below includes a list of paragraphs within the relevant NPS's that are considered relevant to the assessment undertaken in relation to Inter-related Effects. Those paragraphs are set out in full in the NPS Tracker (Appendix A). The NPS Tracker also sets out in detail how Morgan Generation Assets has addressed the requirements of the relevant NPS paragraphs.

Table 2.28: Summary of National Policy Statements relevant to the Inter-related Effects Assessment.

National Policy Statements – Paragraphs relevant to the Climate Change Assessment
NPS EN-1
Environmental Effects/Considerations – Secretary of State Decision Making – Paragraph 4.3.19

2.20.1.3 In order to address **NPS EN-1 paragraph 4.3.19**, an inter-related effects assessment has been undertaken for Morgan Generation Assets. This is presented in Volume 2, Chapter 15: Inter-related Effects of the Environmental Statement (Document Reference F2.15).

2.20.1.4 The Inter-related effects assessment has been carried out in a 4-stage process which covered:

- An assessment of effects undertaken for individual EIA topic areas within chapters 1 to 14.
- Review of assessments undertaken within chapters 1 to 14 to identify 'receptor groups' requiring assessment.
- Identification of potential inter-related effects on receptor groups through review of the topic-specific assessments in the Environmental Statement chapters and;
- An assessment on how individual effects may combine to create inter-related effects on each receptor group for project lifetime effects (i.e. during construction, operations and maintenance and decommissioning phases) and Receptor-led effects (i.e. multiple effects on a single receptor).

Summary of Effects

2.20.1.5 As required by NPS EN-1 paragraph 4.3.19, Volume 2, Chapter 15: Inter-related effects of the Environmental Statement (Document Reference F2.15) considers indirect and secondary likely significant inter-related impacts. For example, the

separate impacts of sound and habitat loss may have an effect upon a single receptor such as marine mammals.

2.20.1.6 The overall significance of any inter-related effects is not judged to increase above the significance value assessed for individual effects in the topic-specific chapters.

Policy Compliance

2.20.1.7 Morgan Generation Assets has been assessed as required by the NPS EN-1 with regard to inter-related effects.

2.20.1.8 Given that no inter-related effects are considered to increase the significance value assessed for individual effects in the topic-specific chapters and there are unlikely to be any significant project lifetime effects the presumption in favour of consent as an energy NSIP and CNP proposal is unaffected by the conclusions of the inter-related effects assessment.

2.21 Considerations and overall conclusions

2.21.1.1 This Planning Statement sets out the background and context of the Morgan Generation Assets as well as the legislative and policy framework the application should be assessed against. It includes a description of the need for the Morgan Generation Assets and its benefits, plus the outcome of the environmental assessment work including both beneficial and adverse effects.

2.21.1.2 Section 104(3) of the Planning Act 2008 outlines that the SoS should decide applications in accordance with relevant NPSs with the fundamental test to be applied in the decision-making process being whether, on balance, the Morgan Generation Assets is in accordance with the relevant NPSs.

2.21.1.3 This statement is intended to assist the determination of the application. In particular this section summarises the need for the Morgan Generation Assets, its wider benefits and weighs those against the potential adverse effects identified through the detailed environmental assessment work that has been undertaken.

2.21.1.4 This balance is considered in the context of national, UK and European policies and obligations that seek to tackle climate change, deliver security of the UK's energy supply and promote the necessary shift to renewable energy.

2.22 Project need

2.22.1.1 As established in section 1.4 of this Planning statement, the Morgan Generation Assets would make a significant contribution to meeting national need for energy security, in accordance with policy set out in Part 3 of NPS EN-1.

2.22.1.2 From a national policy context, the need for the Morgan Generation Assets, and offshore wind in general, is confirmed by NPS EN-1, with increased support confirmed in NPS EN-3. Part 3 of NPS EN-1 outlines the urgent need for all types of energy infrastructure in order to achieve energy security and dramatically reduce GHG emissions (paragraphs 3.1.1 and 3.3.63). When determining applications for offshore wind this should be done on the basis that the Government has demonstrated that there is a need for this type of infrastructure and subsequently substantial weight should be given to the contribution these projects would make towards satisfying this need. In particular, paragraph 3.3.62 of NPS EN-1 states that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure" including offshore wind.

2.22.1.3 Part 3 also explains that, without significant amounts of new large-scale energy infrastructure, the Government's energy and climate change objectives cannot be fulfilled and this will not be possible without some significant residual adverse impacts (paragraph 3.1.2). Whilst there is a general presumption in favour of consenting NSIPs based on the UK Government's assessment of the need for electricity generating capacity, the NPSs designated in January 2024 now include a strengthened presumption specifically in relation to critical national priority (CNP) infrastructure.

2.22.1.4 Paragraphs 3.3.62 and 4.2.4 of NPS EN-1 confirm that the Government "… has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure." Importantly, in relation to CNP Infrastructure, paragraph 3.3.63 of NPS EN-1 reaffirms the Government's approach to addressing the urgent need for such projects, like the Morgan Generation Assets, and goes further by stating "Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible." (our underlining).

2.22.1.5 The strengthened presumption in favour of CNP infrastructure also confirms that "where non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure" and " … in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts." (paragraph 4.2.16).

2.22.1.6 In this regard, NPS EN-1 states the starting point for decision making is to treat CNP infrastructure as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality, or very special circumstances.

2.22.1.7 This need for the Morgan Generation Assets is further confirmed in wider international and national governmental obligations and objectives relating to low carbon electricity generation, climate change and the economy including the CoP Glasgow Climate Pact 2021, the UK Climate Change Act 2008 and the UK Government Energy Security Statement (April 2022).

2.22.1.8 Furthermore, it has recently been re-enforced by agreements made at COP 28 in November 2023 whereby the Global Renewables and Energy Efficiency Pledge, with endorsement from 130 national governments, now stipulates that signatories commit to work together to triple the world's installed renewable energy generation capacity to at least 11,000 GW by 2030.

2.22.1.9 The Morgan Generation Assets:

2.22.1.10 Contributes towards the types of energy infrastructure confirmed as needed in NPS EN-1 and EN-3 in order for the UK to decarbonise its economy and achieve energy security and Net Zero.

2.22.1.11 Is confirmed as being low carbon energy infrastructure that the Government has concluded is a critical national priority (CNP) in terms of both generation and transmission as confirmed by paragraphs 3.3.62 and 4.2.5 of NPS EN-1, paragraphs 2.1.7 and 2.1.8 of NPS EN-3 and paragraph 2.12.7 of NPS EN-5.

2.22.1.12 Contributes substantially towards the recognised urgent need in the UK for new CNP low carbon energy infrastructure 'to be brought forward as soon as possible' (NPS EN-1 paragraph 3.3.58).

2.22.1.13 Makes a contribution towards the UK's part in meeting the revised recently agreed COP 28 Global Renewables and Energy Efficiency Pledge to triple the world's installed renewable energy generation capacity by 2030.

2.22.1.14 Contributes towards the British Energy Security Strategy's recently revised target of 50 GW of offshore wind by 2030 set out in the UK Government's 2022 Energy Security Statement.

2.22.1.15 Assists in meeting the UK Government's revised target in the Climate Change Act of 'net zero' greenhouse gas emissions for the year 2050 (i.e. to be 100% lower than the 1990 levels) in order to meet its obligations under international climate change agreements.

2.22.1.16 Assists in meeting future increases in electricity demand as significant sectors of energy demand switch from being powered by fossil fuels to using electricity.

2.22.1.17 Specifically in relation to this need, NPS EN-1 confirms that the Morgan Generation Assets should be considered on the basis that the Government has demonstrated that there is a need for renewable energy infrastructure, that the scale of the need is significantly in excess of what is currently being promoted and that the need for renewable energy is urgent (paragraphs 3.1.1, 3.2.6 and 3.5.58 of EN-1).

2.22.1.18 Furthermore, as recently emphasised in the newly designated NPSs, this urgent need for low carbon energy infrastructure, such as the Morgan Generation Assets, is a critical national priority (CNP) (paragraph 3.3.62 of NPS EN-1). Accordingly, substantial weight should be given to the contribution which the Morgan Generation Assets would make towards satisfying this need (paragraph 3.2.7 of EN-1).

2.22.1.19 It is important to note that CNP Infrastructure, paragraph 3.3.63 of NPS EN-1 not only stresses the urgent need for such projects by confirming that the need 'will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy', but reiterates that the Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.

2.22.1.20 It has been shown throughout the ES chapters that any residual impacts are within limits deemed acceptable by policy standards and include:

- Shipping and Navigation: Impacts are noted from minor to moderate to commercial operators including strategic routes and lifeline ferries; adverse weather routeing; vessel to vessel collision risk and allision (contact) risk to vessels.
- Climate Change: Minor adverse impacts are noted from the impact of GHG emissions arising from the manufacturing and installation of the Morgan Generation Assets and consumption of materials.
- Aviation and Radar: Minor adverse impacts are noted in the form of creating a physical obstacle to aircraft operations and wind turbines causing interference on aviation PSR systems.
- Marine Conservation Zones: Summarises that the proposed activities are not capable affecting (other than insignificantly) either: the protected features of an MCZ, or any ecological or geomorphological process on which the conservation of any protected feature of an MCZ is (wholly or in part) dependant.
- Marine Mammals: Commitments are made to the development of an Underwater sound management strategy secured via deemed marine licences to reduce the magnitude of impacts, such that there will be no residual significant effect for the project alone and therefore no contribution to cumulative effects.

- Commercial Fisheries: minor impacts are noted to commercially imported fish and shellfish resources.
- Benthic Subtidal Ecology: potential impacts include temporary habitat loss/disturbance, increased SSC and associated deposition, long term habitat loss/habitat alteration, colonisation of hard structures, introduction of artificial structures, increased risk of introduction and spread of INNS, removal of hard substrate and changes in physical processes.
- Fish and Shellfish Ecology: The impacts assessed include temporary habitat loss/disturbance, underwater sound impacting fish and shellfish receptors, increased SSCs and associated sediment deposition, long term habitat loss, EMFs from subsea electrical cabling, introduction and colonisation of hard structures, remobilisation of sediment bound contaminants and injury to basking shark due to increased risk of collision with vessels. Overall, it is concluded that, aside from underwater sound effects during construction, there will be no significant effects impacting fish and shellfish receptors and following the implementation of an Underwater Sound Management Strategy, there will be no significant residual effects.
- Physical Processes: No residual effects are noted with impacts assessed to the increase in suspended sediments due to construction, operations and maintenance and/or decommissioning related activities, and the potential impact to physical features. As well as changes to tidal currents, wave climate, littoral currents and sediment transport being negligible.

2.22.2 Project benefits

2.22.2.1 The benefits of the Morgan Generation Assets in terms of meeting the urgent need for energy generation identified above are set out in this section.

2.22.2.2 Construction of the Morgan Generation Assets is intended to commence in 2026, and the Morgan Generation Assets is intended to be fully operational by 2030 in order to provide an important contribution to the UK Government's renewable energy targets.

2.22.2.3 When operational the Morgan Generation Assets will generate over 1.5GWof renewable energy thereby making a substantial contribution to the delivery of the 50 GW of renewable energy that the UK Government is aiming to be provided by offshore wind by 2030 as set out in the April 2022 UK Government Energy Security Statement.

2.22.2.4 Resultant reductions in carbon dioxide emissions will contribute to meeting global, European and national targets on carbon dioxide (CO2) reduction in line with the Climate Change Act 2008 (2050 Target Amendment) Order 2019 and the CoP Glasgow Climate Pact 2021 which has recently re-enforced by agreements made at COP 28 whereby the Global Renewables and Energy Efficiency Pledge commits 130 national governments to work together to triple the world's installed renewable energy generation capacity by 2030.

2.22.2.5 The climate change assessment into the Morgan Generation Assets confirms that it would enable the use of excess renewable electricity (avoiding generation curtailment) and the displacement of fossil fuels which would be a positive GHG effect, such that, when considering the avoided emissions, in addition to operations and maintenance emissions, the effect results in the order of approximately 2,296,671 tCO2e savings by 2064. This would be a **significant beneficial effect** and provide a substantial contribution towards the above-mentioned targets.

2.22.2.6 In more contextual terms, the Morgan Generation Assets would generate enough renewable electricity in year one to power over 1.3 million households across England.

2.22.2.7 In addition to the energy-related benefits set out above, the Morgan Generation Assets has other additional socio-economic and human health benefits.

2.22.2.8 In terms of **socio-economic benefits**, generally the UK Government Carbon Budgets 2016 are driven by policies and UK Government initiatives to support the development of renewable energy in the UK, Europe and further afield based upon recognition of the need to transition to low carbon economies. The Morgan Generation Assets will clearly make a significant contribution towards this much needed transition to low carbon economies.

2.22.2.9 More specifically in respect of effects of the Morgan Generation Assets, there are potential socio-economic benefits in long term economic impacts associated with the construction and operations and maintenance phases of the project. For example, if a port in north Wales is selected to support the Morgan Generation Assets it is estimated it could provide long term economic impacts (35 years) for the operations and maintenance phase, with a moderate beneficial impact which is significant in EIA terms. The scale of these potential impacts will vary depending on which port location is selected to support either or both of the construction and operations and maintenance phases of the project.

2.22.2.10 The above economic benefits are likely to provide wider social beneficial effects such as increased employment opportunities for local residents, local businesses, accommodation, and tourism, especially in relation to increased use of local accommodation and businesses. The Applicant Is committed to maximising these potential benefits where possible and an Outline Skills and Employment Plan (Document Reference J8) is provided with the Application.

2.22.2.11 Based on assumptions regarding UK content of the Morgan Generation Assets expenditure, which draw on previously delivered offshore windfarms in the UK, it is estimated the Morgan Generation Assets activities within the UK could support up to 9,380 jobs and £675 million in GVA.

2.22.2.12 In terms of human health, there are predicted to be no significant adverse effects arising from the Morgan Generation Assets but potential for significant benefits during the operations and maintenance phase in relation to energy security. Furthermore, in a cumulative context, wider societal infrastructure and resources in relation to renewable energy generation are expected to have a significant beneficial effect.

1.1.1.1 The Applicant is committed to achieving overall biodiversity benefit for the Morgan Generation Assets and has presented an approach for achieving this within the outline Biodiversity benefit statement (Document Reference J18). The Applicant has identified a number of potential opportunities which could deliver additional marine biodiversity benefit to the Morgan Generation Assets. The biodiversity benefit measures and opportunities outlined in the Biodiersity benefit statement will be considered and prepared further through engagement with relevant stakeholders post-consent.

2.23 Consideration of the planning balance

2.23.1.1 The Morgan Generation Assets compliance with relevant planning policy, primarily NPS EN-1, EN-3, and EN-5 but also relevant Marine policies, has been demonstrated throughout section 1.5 of this Planning statement in relation to each specific topic.

2.23.1.2 Further detail on the project's compliance with the NPSs and other relevant policy is set out in the individual chapters of the Environmental Statement and other relevant

supporting application documents and the NPS Tracker (Appendix A) in particular, confirms in detail how the Morgan Generation Assets accords with NPS EN-1 and EN-3, and EN-5.

2.23.1.3 Section 1.5 to 1.21 of this Planning Statement confirm that the construction, operations and maintenance and decommissioning of the Morgan Generation Assets **alone** will not result in any significant adverse effects in relation to:

- physical processes,
- benthic subtidal ecology,
- offshore ornithology,
- commercial fisheries,
- marine archaeology and cultural heritage,
- other sea users,
- seascape, landscape and visual resources,
- aviation and radar,
- climate change,
- socio-economics,
- human health, and
- inter-related effects.

2.23.1.4 The only potentially significant adverse effects identified as a result of Morgan Generation Assets relate to:

- Fish and shellfish whereby the only effect relates to herring as a result of underwater sound generated by piling during the herring spawning period. Tertiary mitigation is implemented through the Outline Underwater Sound Management Strategy (Document Reference J13). This strategy establishes a process of investigating options to manage underwater sound levels in consultation with the licensing authority and Statutory Nature Conservation Bodies (SNCBs). And agreeing, which mitigation measures will be implemented to reduce impacts such that there will be no residual significant effect.
- Marine mammals where the only effect is in relation to elevated underwater sound during UXO clearance for harbour porpoise. Again, the proposed mitigation, in the form of the outline UWSMS (Document Reference J13), the outline Marine Mammals Mitigation Protocol (MMMP) (Document Reference J17) and the Measures to Minimise Disturbance to Marine Mammals and Rafting Birds (Document Reference J15) will ensure that all such effects are appropriately mitigated to a non-significant level.
- Shipping and navigation where the effect on adverse weather routeing for some ferry services (Stena Line between Liverpool and Belfast and Isle of Man Steam Packet Company between Liverpool and Douglas) could be significant. Through a structured navigation risk assessment, all hazards to marine navigation with the Morgan Generation Assets were assessed to be either Broadly Acceptable or As Low As Reasonably Practicable. Despite this, the assessment has concluded that a significant effect in relation to adverse weather routing remains and, as such, the Applicant has committed to engaging with affected

stakeholders with this engagement intended to continue beyond submission of the application and run in parallel with the application determination process.

2.23.1.5 In relation to **cumulative effects** the only potentially significant adverse effects are in relation to:

- Marine mammals where there is potential for significant effects as a result of behavioural disturbance during piling for bottlenose dolphin. There is also potential for a reduction in lifetime reproductive success to bottlenose dolphin and a possible reduction in size of a declining ISMU population. The other potential effect is from injury from UXO clearance for harbour porpoise which may potentially be exposed to sound levels that could elicit permanent auditory injury. As the project alone assessment determined there is the potential for significant effect in EIA terms from UXO clearance, it is acknowledged this may contribute to the cumulative impact with other UXO clearance activities within the Cumulative Effects Assessment (CEA) area. The project has committed to the development of an Underwater sound management strategy (Document Reference J13) to investigate options to reduce any potential significant impacts to a non-significant level. The Underwater sound management strategy will be developed and agreed with stakeholders post-consent.
- Shipping and navigation whereby taking account of the Mooir Vannin OWF could result in a reduction in searoom for the routes, the cumulative effect on risks of collision and allision is considered to be significant. As the predicted effect results from the addition of Mooir Vannin OWF, no further mitigation is proposed by the Applicant. It is noted that the Mooir Vannin OWF Limited (2023) Shipping and Navigation Impact Assessment will be undertaken in line with MCA MGN654 and its 'Methodology for Assessing Marine Navigational Safety and Emergency Response Risks'. It is therefore assumed that, in line with accepted EIA practice, potential cumulative effects will be considered by Mooir Vannin OWF in its assessment and that they will be considered through its consenting process.

2.23.1.6 The Morgan Generation Assets will have no significant adverse **transboundary effects.**

2.24 References

Department for Business, Energy and Industrial Strategy (BEIS) and Prime Minister's Office (2022). British Energy Security Strategy. Available: https://assets.publishing.service.gov.uk/media/626112c0e90e07168e3fdba3/british-energy-security-strategy-web-accessible.pdf. Accessed November 2023.

Department for Energy Security & Net Zero (DESNZ) (2023a) Overarching National Policy Statement for Energy (NPS EN-1). Available: https://assets.publishing.service.gov.uk/media/655dc190d03a8d001207fe33/overarching-nps-for-energy-en1.pdf. Accessed November 2023.

Department for Energy Security & Net Zero (DESNZ) (2023b) National Policy Statement for Renewable Energy Infrastructure (NPS EN-3). Available: https://assets.publishing.service.gov.uk/media/655dc352d03a8d001207fe37/nps-renewable-energy-infrastructure-en3.pdf. Accessed November 2023.

Department for Environment, Food and Rural Affairs (Defra) (2011) Marine Policy Statement. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf. Accessed November 2023.

Department for Levelling Up, Housing &Communities (DLUHC) National Planning Policy Framework. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1182995/NPPF_Sept_23.pdf. Accessed November 2023.

HM Government (2020) The Ten Point Plan for a Green Industrial Revolution. Building back better, supporting green jobs, and accelerating our path to net zero. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf. Accessed November 2023.

HM Government (2021) Net Zero Strategy: Build Back Greener. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf. Accessed November 2023.

HM Government (2021a) North West Inshore and North West Offshore Marine Plan. Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1004490/FINAL_North_West_Marine_Plan__1_.pdf. Accessed November 2023.

NGESO (2022) The Pathway to 2030 Holistic Network Design. Available: https://www.nationalgrideso.com/document/262681/download. Accessed September 2023.

The Climate Change Committee (2019) https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/. Accessed November 2023.

The Crown Estate (2014)

The Planning Inspectorate (2018) Advice Note Nine: Rochdale Envelope. Available: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-nine-rochdale-envelope/. Accessed November 2023

United Nations (2015) Paris Agreement. Available: https://unfccc.int/sites/default/files/english_paris_agreement.pdf. Accessed November 2023.

United Nations Framework Convention on Climate Change (UNFCCC) (2021) Glasgow Climate Pact. Available: https://unfccc.int/sites/default/files/resource/cop26_auv_2f_cover_decision.pdf. Accessed November 2023.

Appendix A: National Policy Statement Tracker

A.1. National Policy Statement tracker

A.1.1 Introduction

A.1.1.1.1 Section 5 of the Planning Act 2008 (PA 2008) outlines that National Policy Statements (NPS) may be designated by the Secretary of State (SoS) setting out national policy in relation to one or more specified descriptions of development.

A.1.1.1.2 The policies in a NPS may, in particular:

- Set out, in relation to a specified description of development, the amount, type or size of development of that description, which is appropriate nationally or for a specified area;
- Set out criteria to be applied in deciding whether a location is suitable (or potentially suitable) for a specified description of development;
- Set out the relative weight to be given to specified criteria;
- Identify one or more locations as suitable (or potentially suitable) or unsuitable for a specified description of development;
- Identify one or more statutory undertakers as appropriate persons to carry out a specified description of development; and
- Set out circumstances in which it is appropriate for a specified type of action to be taken to mitigate the impact of a specified description of development.

A.1.1.1.3 Section 104 of the PA 2008 states that in making a decision regarding a Development Consent Order (DCO), the SoS must have regard to any NPS which has effect in relation to development of the description to which the application relates (a “relevant national policy statement”).

A.1.1.1.4 NPSs describe the national case and establish the need for certain types of infrastructure development including energy, as well as identifying key issues that should be considered by the Examining Authority (ExA) and decision-maker when examining an application for Development Consent.

A.1.1.1.5 The key test is to assess, on balance, whether the application is in accordance with the relevant NPSs and whether any specified exceptions apply. This may include considering whether the policies set out in the NPSs for delivery of renewable energy are outweighed by any adverse impacts that have been identified, noting the presumption is in favour of applications, which accord with any relevant NPSs.

A.1.1.1.6 The original suite of energy NPSs were designated by the Department of Energy and Climate Change in 2011 however, the Department for Energy Security and Net Zero (DESNZ) has published the revised NPSs (EN-1 to EN-5). These came into force on 17 January 2024. The Planning Statement is based on these revised NPSs.

A.1.1.1.7 The following NPSs are relevant to the Morgan Offshore Wind Project (hereafter, the Morgan Generation Assets) and will be considered in the application for Development Consent:

- NPS for Overarching Energy (EN-1)
- NPS for Renewable Energy (EN-3)
- NPS for Electricity Networks (EN-5).

A.1.1.1.8 NPS EN-5 is the NPS which provides detail of electricity networks (including grid connections for wind farms) and sets out assessment principles in relation to the

consideration of applications relating to electricity networks. In terms of offshore wind, this relates to substations, convertor stations and other kinds of electricity infrastructure such as underground and sub-sea cables. As Morgan Generation Assets is for the offshore generation elements of the Morgan Offshore Wind Project EN-5 relates solely to the offshore substation platforms (OSP) and subsea cable elements of the Morgan Generation Assets (inter-array and inter-connector cabling).

A.1.1.1.9 Information on the accordance of the Morgan Generation Assets with the three relevant NPSs mentioned above is outlined within the Planning Statement and Environmental Statement, which form part of this application for Development Consent. In addition, this NPS tracker outlines the Morgan Generation Assets' accordance with the three NPSs in order to assist the ExA in making its recommendation, and the SoS in making its determination on the application.

A.1.1.2 The Planning Statement

A.1.1.2.1 The Applicant has provided a Planning Statement as part of the Morgan Generation Assets application to provide an overview of the scheme's compliance with relevant policy and to assist the ExA and SoS in their reviews of the application in the context of relevant planning policy.

A.1.1.2.2 The Planning Statement sets out the need for the scheme in the context of the NPS, as well as a planning assessment considering the relationship between the Morgan Generation Assets and the relevant NPS policies.

A.1.1.3 The Environmental Statement

A.1.1.3.1 The Applicant has provided a full Environmental Impact Assessment (EIA), reported in the Environmental Statement that accompanies the application, which includes information on the relationship between the Morgan Generation Assets and the topic-specific planning policies outlined in the NPS.

A.1.1.3.2 As part of the EIA process, the scope of assessment work was undertaken in line with the NPS to ensure compliance. As set out in Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), relevant issues in NPS EN-1, EN-3 and EN-5 were identified and assessed in detail within the policy sections of the topic-specific Environmental Statement chapters.

A.1.1.4 Environmental Statement chapters

A.1.1.4.1 Table A.1 outlines the sections included within the Morgan Generation Assets Environmental Statement and the way they will be referenced in this document hereafter.

Table A.1: Environmental Statement documents.

Document	Document name
	Volume 1 – Introductory chapters
-	Non-Technical Summary
1	Introduction and overarching glossary
2	Policy and legislative context
3	Project description

Document	Document name
4	Site selection and consideration of alternatives
5	Environmental Impact Assessment methodology
	Volume 2 – Offshore chapters
1	Physical processes
2	Benthic subtidal ecology
3	Fish and shellfish ecology
4	Marine mammals
5	Offshore ornithology
6	Commercial fisheries
7	Shipping and navigation
8	Marine archaeology and cultural heritage
9	Other sea users
10	Seascape, landscape and visual resources
11	Aviation and radar
12	Climate change
13	Socio-economics
14	Human health assessment
15	Inter-related effects
	Volume 3 – Introductory annexes
3.1	Underwater noise technical report
3.2	Sulphur hexafluoride report
4.1	Selection and refinement of the offshore infrastructure
5.1	Cumulative effects screening matrix
5.2	Transboundary impacts screening
	Volume 4 - Offshore annexes
1.1	Physical processes technical report
2.1	Benthic subtidal ecology technical report
3.1	Fish and shellfish ecology technical report
4.1	Marine mammals technical report
5.1	Offshore ornithology baseline characterisation
5.2	Offshore ornithology displacement technical report
5.3	Offshore ornithology collision risk modelling technical report
5.4	Offshore ornithology migratory bird collision risk modelling technical report
5.5	Offshore ornithology apportioning technical report
5.6	Offshore ornithology PVA technical report

Document	Document name
6.1	Commercial fisheries technical report
7.1	Navigational Risk Assessment
8.1	Marine archaeology technical report
8.2	Cultural Heritage technical report
9.1	Radar Early Warning technical report
10.1	Seascape, landscape and visual resources legislation and planning policy context
10.2	Seascape and landscape character baseline technical report
10.3	Visual baseline technical report
10.4	Seascape, landscape and visual resources impact assessment methodology
10.5	International and nationally designated landscape study
10.6	Seascape visualisations
11.1	Aviation and radar technical report
12.1	Technical greenhouse gas assessment
12.2	Climate change risk assessment
13.1	Socio-economics technical impact report
14.1	Airbourne Construction Sound Technical Report

A.1.2 National Policy Statement accordance

A.1.2.1.1 The following section outlines relevant sections of NPS EN-1, EN-3, and EN-5, specifically those that relate to energy generation and offshore wind elements.

A.1.2.1.2 Table A.2 illustrates the accordance of the Morgan Generation Assets with the relevant sections of the NPSs.

A.1.2.2 NPS EN-1 Accordance

Table A.2: Overarching National Policy Statement for energy (EN-1) Accordance.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Secretary of State decision making	3.2.1 – 3.2.4	The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including through delivery of our carbon budgets and Nationally Determined Contributions. We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives. It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas. It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types.	This application accords with these requirements as it seeks to supply a secure, reliable and renewable source of energy in a manner which responds to market demand and assists in diversifying energy supply by utilising offshore wind for energy generation. The Morgan Generation Assets will also contribute to National net zero goals by providing an alternative source or renewable energy which reduces emissions largely associated with the use of fossil fuels for energy generation. When looking at greenhouse gas emission (GHG) in particular, the magnitude of the impact resulting from the Morgan Generation Assets has been demed to be of beneficial effect, which is significant in EIA terms as evidenced within Volume 2, Chapter 12: Climate Change of the Environmental Statement (Document Reference F2.12). Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) as well as the Planning Statement (Document Reference J2) sets out the need and adherence of the Morgan Generation Assets to policy and legislation, and Volume 2, Chapter 12: Climate Change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.	
	3.2.6 – 3.2.7	The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part. In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	This application accords with these requirements as it seeks to provide a development which has been identified as Critical National Priority (CNP) under Paragraphs 3.3.62 and Section 4.2 of EN-1.
The need for new nationally significant electricity infrastructure	3.3.1 – 3.3.2	Electricity meets a significant proportion of our overall energy needs and our reliance on it will increase as we transition our energy system to deliver our net zero target. We need to ensure that there is sufficient electricity to always meet demand; with a margin to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events. The larger the margin, the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption. This helps to protect businesses and consumers, including vulnerable households, from volatile prices and, eventually, from physical interruptions to supply that might impact on essential services.	This application is for a NSIPas it will have an installed capacity of at least 100MW, which will assist in meeting a proportion of the overall national energy need whilst also assisting in the transition to net zero by supplying electricity from offshore wind as a renewable energy source. The installed capacity will also assist in meeting peak demands for energy, increasing energy resiliency. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), sets out the need and adherence of the Morgan Generation Assets to policy and legislation, and Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change. Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), presents the requirements for the Morgan Generation Assets.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
	3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand.	This application accords with these requirements as it seeks to supply a reliable and renewable source of energy in a manner which diversifies energy supply by utilising offshore wind for energy generation to aid in the aim of meeting increased demand. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), sets out the need and adherence of the project to policy and legislation, and Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change. The Planning Statement (Document Reference J2)presents the need for the Morgan Generation Assets.
	3.3.19	Given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios.	This application accords with these requirements as it seeks to supply a secure, reliable and renewable source of energy in a manner which responds to market demand and assists in diversifying energy supply by utilising offshore wind for energy generation. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) as well as the Planning Statement (Document Reference J2), set out the need and adherence of the Morgan Generation Assets to policy and legislation, and Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change.
The role of wind and solar	3.3.20	Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	The recognition set on Paragraph 3.3.20 further identifies the important role wind has and will have in achieving net zero by 2050. The Morgan Generation Assets, as an offshore generation project, will have the potential to power approximately 1.5 million homes without reliance on fuel for generation. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) as well as the Planning Statement (Document Reference J2), set out the need and adherence of the Morgan Generation Assets to policy and legislation.
The role of wind and solar	3.3.23 – 3.3.24	Applications for onshore wind of all sizes should be consented outside of the Planning Act 2008 process, unless the Secretary of State directs otherwise under section 35 of the Planning Act 2008. Applications for offshore wind above 100MW or solar above 50MW in England, or 350MW for either in Wales,	As the Morgan Generation Assets is an offshore generating station with a capacity greater than 100 MW located wholly in English waters, it is a Nationally Significant Infrastructure Project (NSIP) as defined by Section 15(3) of the Planning Act 2008 (as amended) (the 2008 Act). As such, there is a requirement to submit an application for a DCO to the Planning

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		will continue to be defined as NSIPs, requiring consent from the Secretary of State (see EN-3).	Inspectorate to be decided by the Secretary of State for Energy Security and Net Zero. This application complies with this requirement.
The need for electricity generating capacity	3.3.59	All the generating technologies mentioned above are urgently needed to meet the government's energy objectives by: • providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type) • providing an affordable, reliable system (through the deployment of technologies with complementary characteristics) • ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)	This application accords with these requirements as it seeks to supply a secure, reliable and renewable source of energy in a manner which responds to market demand and assists in diversifying energy supply by utilising offshore wind for energy generation. Offshore wind is identified as one of the generating technologies in NPS EN-1 Paragraphs 3.3.20 - 3.3.24 that is likely to secure a reliable, affordable, net zero consistent system by 2050. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), sets out the need and adherence of the Morgan Generation Assets to policy and legislation; Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the details of the project and its energy generating capacities and Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change.
The need for electricity generating capacity	3.3.60 - 3.3.63	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include: • Offshore Wind (including floating wind) … The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for both energy security and Net Zero, as set out above. Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure. Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives,	This application complies with this requirement as it proposes to generate electricity from offshore wind, identified in Section 4.2 of EN-1 as CNP infrastructure. It also assists in achieving the national energy and net zero objectives by providing a source a renewable energy. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), sets out the need and adherence of the Morgan Generation Assets to policy and legislation; Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the details of the project and its energy generating capacities and Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	
The need for new electricity networks	3.3.71	The historical approach to connecting offshore wind resulted in individual radial connections developed project-by-project. While this may continue to be the most appropriate approach for some areas with single offshore wind projects that are not located in the proximity of other offshore wind infrastructure, it is expected that for regions with multiple windfarms a more coordinated approach will be delivered. For these areas, this approach is likely to reduce the network infrastructure costs as well as the cumulative environmental impacts and impacts on coastal communities by installing a smaller number of larger connections, each taking power from multiple windfarms instead of individual point-to-point connections for each windfarm.	In accordance with the UK Government published the 'Pathway to 2030 Holistic Network Design' in 2022 it was set out the approach to connecting 50 GW of offshore wind to the National Grid. A key output of the Holistic Network Design Review (HND) process was the conclusion that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. Although the projects are being developed by separate companies, which means it is not feasible for all aspects of both projects to be consented under a single application, the Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham. Of note however, this application solely relates to the offshore generation assets of Morgan Offshore Wind Project which is set within this coordinated approach.
Bringing forward new electricity infrastructure projects	3.3.82 – 3.3.83	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand. Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of the Morgan Generation Assets on climate change. This includes the associated avoided emissions that would be achieved through the operations and maintenance phase of the Morgan Generation Assets. The Planning Statement (Document Reference J2) also provides with the justified need for the project.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
General Policies and Considerations	4.1.2 – 4.1.3	The Energy White Paper and British Energy Security Strategy emphasises the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. The Levelling Up White Paper calls on the Government to ensure investment in the transition to Net Zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development and the creation of jobs. Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.	This is an offshore wind power-generating project which, by its nature, falls within the categories set in EN-1 as a CNP, where an urgent need has been identified. Paragraphs 4.1.2 and 4.1.3 further substantiate the presumption in favour of this project as an energy NSIP. Evidence to demonstrate that the project also complies with other more specific and relevant policies are addressed within Volume 1, Chapter 2: Policy and Legislative Context of the ES (Document Reference F1.2) and each of the topic chapters of the ES. Compliance with policy is further demonstrated within the submitted Planning Statement (Document Reference J2).
Weighing impacts and benefits	4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits; • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.	The Environmental Statement catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, which can be used to allow weighing of impacts and benefits in the decision-making process. In addition, the Environmental Statement also provides an assessment of ecosystem based impacts in Volume 2, Chapter 15: Inter-related effects of the Environmental Statement (Document Reference F2.15).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
	4.1.6	In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1 [of EN-1].	The Environmental Statement catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, which can be used to allow weighing of impacts and benefits in the decision-making process. In addition, Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), provides the national, regional and local context of the Morgan Generation Assets, whilst topic-specific policies and legislations are assessed in each topic chapter.
	4.1.11	The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate.	Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), provides the national and regional context of the Morgan Generation Assets, whilst topic-specific policies and legislations are assessed in each topic chapter.
	4.1.12	Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement, provides the national and regional context of the Morgan Generation Assets, whilst topic-specific policies and legislations are assessed in each topic chapter.
	4.1.14	The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.	Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), provides the national and regional context of the Morgan Generation Assets, whilst topic-specific policies and legislations are assessed in each topic chapter. The supporting Planning Statement (Document Reference J2) also details and assesses how the proposal complies with any relevant sections of the Development Plan.
Early engagement	4.1.19	Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance.	Consultation has been undertaken as part of the pre-application phase of the Morgan Generation Assets. The Consultation report (Document Reference E3) of the Environmental Statement describes the consultation process that the Applicant has followed both in terms of the non-statutory consultation and the statutory consultation, and publicity stages as required under sections 42, 47 and 48 of the Planning Act 2008. The Technical engagement plan of the Environmental Statement (Document Reference E4) summarises the technical consultation that has been undertaken for the Morgan Generation Assets, to provide the information and evidence required for EIA and Habitats Regulations Assessment (HRA) processes. Early engagement took place from July 2021, in preparation of the Scoping Report, which was submitted to the Planning Inspectorate in June 2022,

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			with a Scoping Opinion received in July 2022. Discussions regarding the scoping response and the preparation of the PEIR then took place between July 2022 and April 2023. This included a non-statutory consultation which took place between 2 November and 13 December 2022. The PEIR was published at the start or statutory consultation, which ran from 19 April to 4 June 2023, with three additional targeted statutory consultations taking place between June and July 2023, August and September 2023 and February and March 2024. Please see section 5.3 of the Consultation Report (Document Reference E3) for additional information on these additional targeted statutory consultations. Post-PEIR engagement in preparation of the DCO application has taken place from June 2023 and is anticipated to continue through to Q2 2024. Throughout the consultation phase, ongoing non-statutory engagement has also been taking place in tandem throughout the same time frame. Please see Figure 2.1 of the Consultation Report (Document Reference E3) for a summary of the approach to consultation.
Critical National Priority for low carbon infrastructure			
Critical National Priority	4.2.6	The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.	This application assists in achieving the national energy and net zero objectives by providing a source of renewable energy. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2), sets out the need and adherence of the Morgan Generation Assets to policy and legislation; Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the details of the project and its energy generating capacities
Environmental principles			
Applicant assessment	4.2.10 – 4.2.12	Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	This application demonstrates how the project meets the requirements of the NPS in its application of the mitigation hierarchy, as established in Volume 1, Chapter 5: Environmental Impact Assessment Methodology (Document Reference F1.5) as well as within the Mitigation and Monitoring Schedule (Document Reference J6). Cumulative impacts and inter-related effects are addressed under Volume 2, Chapter 15: Inter-related Effects of

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	the Environmental Statement (Document F2.15) and Volume 3, Annexes 5.1 and 5.2 of the Environmental Statement (Document Reference F3.5.1 and F3.5.2). The application also complies with 4.2.12 since advice from appropiate SNCB and statutory bodies have been sought and taken into account. This is evidenced within the Technical Engagement Plan (TEP) (Document E4 and TEP Appendices Document Reference E4.1 and E4.2).
	4.3.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.	An Environmental Statement has been submitted for this application which catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, which can be used to allow weighing of impacts and benefits in the decision-making process.
	4.3.2	The Regulations specifically refer to effects on population, human health, biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them.	These assessments are contained within the Environmental Statement which can be used in the weighing of impacts and benefits in the decision-making process. These specific topics are covered in the following: - Population: Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document Reference F2.13); - Human Health: Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14); - Biodiversity: Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5);

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			- Climate: Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12); - Landscape (seascape): Volume 2, Chapter 10: Seascape, landscape and visual resources of the Environmental Statement (Document Reference F2.10) Material assets and cultural heritage: Volume 2, Chapter 8: Marine archaeology of the Environmental Statement (Document Reference F2.8) ; and I interaction between them: Volume 2, Chapter 15: Inter-related effects of the Environmental Statement (Document Reference F2.15).
	4.3.3	The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.	Impacts have been assessed within each of the topic-specific chapters of the Environmental Statement and an assessment of the inter-related effects (offshore) has been carried out. These have taken into account the indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project and have also proposed measure for avoiding or mitigating significant adverse effects when these are identified.
	4.3.4	To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.	An Environmental Statement has been submitted for this application which catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, across all phases of the Morgan Generation Assets, which can be used to allow weighing of impacts and benefits in the decision-making process. A Mitigation and Monitoring Schedule (Document Reference J6) is also provided to comply with the requirements on potential impacts including benefits of the proposal.
	4.3.5	For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation/maintenance and decommissioning of the project.	An Environmental Statement has been submitted for this application which catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, across all phases (pre-construction, construction, operations/maintenance and decommissioning) of development for the Morgan Generation Assets.
	4.3.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is	An Environmental Statement has been submitted for this application which catalogues the wide and thorough assessment undertaken across

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Applicant assessment		sufficient to meet the requirements of the EIA Regulations.	environmental, social and economic receptors, across all phases of the Morgan Generation Assets, which can be used to allow weighing of impacts and benefits in the decision-making process. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document reference F1.2) sets the legislative context, and Volume 1, Chapter 5, Environmental Impact Assessment methodology (Document Reference F1.5) sets out the proportionate approach to the assessment.
	4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case	Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the Rochdale Envelope approach and project design, including the elements yet to be finalised, with an explanation of why these elements are yet to be finalised.
	4.3.12	Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the sets out the Rochdale Envelope approach and project design including the elements yet to be finalised, and each topic-specific assessment has been based on the worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the Morgan Generation Assets have been properly assessed.
	4.3.14	References to an ES in this NPS and the technology specific NPSs should be taken as including a statement which provides this information, even if the EIA Regulations do not apply and where the NPSs requires specific information to be provided in the ES. Such information should still be provided in this statement.	An Environmental Statement has been provided with the Morgan Generation Assets application for consent.
	4.3.15	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.	Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), details the assessments of the reasonable alternatives including the environmental, social, economic, technical and commercial reasons for the preferred choice.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Secretary of State decision making	4.3–18 - 4.3.19	The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details. The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	Volume 1, Chapter 3: Project Description of the Environmental Statement (Document Reference F1.3) presents the Rochdale Envelope used as part of the assessment for this application which considered the worst-case scenario regarding impacts and allows flexibility to account for uncertainties during further project refinement. The Environmental Statement also catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, across all phases of the Morgan Generation Assets, which can be used to allow weighing of impacts and benefits in the decision-making process. Volume 2, Chapter 15: Inter-related Effects of the Environmental Statement (Document Reference F2.15) includes the assessment of inter-related effects.
	4.3.20	The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.	The Morgan Generation Assets identify and seeks to minimise, mitigate and contribute where possible to these legally binding targets as demonstrated in each of the relevant topic chapters of the Environmental Statement. The ISAA (Document Reference E1.1 to E1.3) and the Marine Conservation Zone Screening Assessment (Document Reference E2) also comply with the requirements regarding Marine Protected Areas. Mitigation is included as part of the Mitigation and Monitoring Schedule (Document Reference J6).
	4.3–22 - 4.3.23	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and • only alternatives that can meet the objectives of the proposed development need to be considered.	Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), details the assessments of the reasonable alternatives and detailed reasons for the selection of the Morgan Array Area.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	
	4.3.24	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.	Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4), details the assessments of the reasonable alternatives and detailed reasons for the selection of the preferred choice.
	4.3.25	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.	
Health			
Applicant assessment Secretary of State decision making	4.4.1 – 4.4.2	Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health. The direct impacts on health may include: • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise	The potential human health effects, including inter-related and cumulative effects, of the Morgan Generation Assets are presented in Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14), including direct impacts on health. It is worth noting that Morgan Generation Assets are remote to human health receptors and therefore the main pathway is water pollution, which is considered within section 14.6.2 of Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14)

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• exposure to radiation, and • increases in pests	
	4.4.3 – 4.4.5	New energy infrastructure may also affect the composition, size and proximity of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport or the use of open space for recreation and physical activity. As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.	This is considered within section 14.9.2 of Volume 2, Chapter 14: Human health of the Environmental Statement (Document Reference F2.14) and informed by Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7) and Volume 2, Chapter 13: Socio economics and community (Document Reference F2.13) of the Environmental Statement.
	4.4.7 – 4.4.8	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either constitute a reason to refuse consents or require specific mitigation under the Planning Act 2008. However, the Secretary of State will want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	Impacts on health that are governed by separate regulation (for example air pollution) have been considered and where appropriate issues have been scoped out. See Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14).
Marine Considerations			
Applicant assessment	4.5.8 – 4.5.9	Applicants for a Development Consent Order must take account of any relevant Marine Plans and are expected to complete a Marine Plan assessment as part of their	All relevant Marine Plans and guidelines and how the Morgan Generation Assets aligned with them are outlined in the relevant topic chapters of the

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		project development, using this information to support an application for development consent. Applicants are encouraged to refer to Marine Plans at an early stage, such as in pre-application, to inform project planning, for example to avoid less favourable locations as a result of other uses or environmental constraints.	Environmental Statement (Document reference F–.1 - F2.15) and the submitted Planning Statement (Document reference J2).
Environmental and Biodiversity Net Gain			
Applicant assessment	4.6.6 – 4.6.8	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, or the wider environment where possible. In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application. Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of Morgan Generation Assets. Specific measures for biodiversity are set in the relevant topic chapters, such Volume 2, Chapter 2: Benthic subtidal ecology in the Environmental Statement (Document F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3); Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4); Volume 2, Chapter 5: Offshore Ornithology of the Environmental Statement (Document Reference F2.5) and the Biodiversity Benefit Statement (Document Reference J18).
	4.6.10 – 4.6.13	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain. Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site	Biodiversity Net Gain is not considered for the Morgan Generation Assets as this metric solely relates to onshore projects, whereas this application relates to offshore development only. However, the Morgan Generation Assets does provide Biodiversity enhancements for the marine environment, as demonstrated within the Biodiversity Benefit Statement (Document Reference J18).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		delivery of biodiversity net gain to be set out within the application for development consent. When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use. In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as: • reductions in GHG emissions • reduced flood risk • improvements to air or water quality, • climate adaptation, • landscape enhancement • increased access to natural greenspace, or • the enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	
	4.6.15 – 4.6.18	Applications for development consent should be accompanied by a statement demonstrating how	

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project. Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook'108, the government's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature. Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details. Opportunities for environmental, social, and economic enhancements, protection and mitigation measures are identified in a number of sections in Part 5 of this NPS, which provides guidance on the impacts of new energy infrastructure.	
Criteria for "Good Design" for Energy Infrastructure			
Applicant assessment	4.7.5 – 4.7.9	To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent. Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and	Good design and design principles are set out in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) which set out the design constraints and strategy to ensure good design. Details regarding design and design compliance are also included within Volume 1, Chapter 3: Project Description of the Environmental Statement (Document Reference F1.3).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process. Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority. Further advice on what applicants should demonstrate by way of good design is provided in the technology specific NPSs where relevant.	
Climate change adaptation and resilience			
Applicant assessment	4.10.5 – 4.10.12	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques. Integrated approaches, such as looking across the water cycle, considering coordinated management of	The potential impact on climate change is considered in Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) and details on how the project will be resilient to climate change is addressed in Volume 4, Chapter 12, Annex 2: Climate Change Risk Assessment' (Document Reference F4.12.2). In particular, it has identified that consistently heightened temperatures, changes to rainfall patterns, increased wind speeds and increased frequency of extreme events such as floods and storms could lead to efficiency losses due to overheating, the failure of electrical equipment or

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits. In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere. New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool and British Standards for climate change adaptation, in accordance with the EIA Regulations. Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time. Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant	damage to infrastructure, which would result in an increase in operations and maintenance activities. The impact is predicted to be of national spatial extent, long term duration, continuous and low reversibility. It is predicted that the impact will affect the receptor indirectly. Volume 4, Annex 12.2: Climate change risk assessment of the Environmental Statement (Document Reference F4.12.2) summarises the potential climatic changes in the coming decades and considers the potential consequences for the Morgan Generation Assets in a risk assessment format. The risk assessment presented in Volume 4, Annex 12.2: Climate change risk assessment of the Environmental Statement (Document Reference F4.12.2) considers in its scoring the level of influence the design, construction and operation of the Morgan Generation Assets can have upon the risks, in addition to its severity and probability. Those risks over which the developer has little or no influence are therefore, typically not considered significant effects of the Morgan Generation Assets, save where the severity and/or probability are highes125asely assessment of effects has considered the design measures included within the Morgan Generation Assets (as listed at paragraph 12.8.1.2) in determining the combined risk score. No risks to the Morgan Generation Assets due to climate change have been identified as significant. As such, the effect on the Morgan Generation Assets has been determined to be negligible.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		research which is based on the climate change projections. Where energy infrastructure has safety critical elements (for example parts of new gas-fired power stations or some electricity sub-stations), the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	
Secretary of state decision making	4.10.13 – 4.10.15	The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period. Should a new set of UK Climate Projections or associated research become available after the preparation of the ES, the Secretary of State (or the Examining Authority during the examination stage) should consider whether they need to request further information from the applicant. The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on	The potential impact on climate change is considered in Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) and details on how the project will be resilient to climate change is addressed in Volume 4, Chapter 12, Annex 2: Climate Change Risk Assessment' (Document Reference F4.12.2).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	
Network connection			
Applicant assessment	4.11.5 – 4.11.13	The applicant must liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional DNO or TSO to secure a grid connection. Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible. The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact. The government therefore envisages that wherever reasonably possible, applications for new generating stations and related infrastructure should be contained in a single application to the Secretary of State or in separate applications submitted in tandem which have been prepared in an integrated way, as outlined in EN-5. This is particularly encouraged to ensure development of more co-ordinated transmission overall. On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM	The requirement to liaise with National Grid to secure a grid connection has been considered in Volume 1: Introductory Chapters: Site selection and consideration of alternatives, of the Environmental Statement (Document reference F 1.4) as well as in Other Documents: Grid Connection and Cable Detail Assessment (Document reference J3). Of note, this application is a key output of the HND process which concluded that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. This application solely relates to the offshore generation assets of Morgan Offshore Wind Project which is set within this coordinated approach with the transmission elements, including grid connection being dealt under a separate DCO.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused. If this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections. It is recognised that this may be the situation for some new offshore transmission projects, where applications for consent may be brought forward separate to (though planned with) the applications for associated wind farms as outlined in EN-5.	
Pollution Control and Other Environmental Regulatory Regimes			
Applicant assessment	4.12.5 – 4.12.8	Applicants should consult the MMO (or NRW in Wales) on energy NSIP projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act 2008 (as amended by section 23 of the Marine and Coastal Access Act 2009). Applicants are encouraged to consider the relevant marine plans in advance of consulting the MMO for England or the relevant policy teams at the Welsh government. Many projects covered by this NPS will be subject to the Environmental Permitting Regulations, which also incorporates operational waste management requirements for certain activities. When an applicant applies for an Environmental Permit, the relevant regulator (usually EA or NRW but sometimes the local	The consultation process is outlined in the Consultation Report (Document Reference E3) and Consultation report appendices (Document Reference E3.1) of the Environmental Statement. Topic specific consultation is reported in section 3.3 of each chapter of the Environmental Statement, including any communications with the MMO. A Technical Engagement Plan (TEP) (Document E4) and TEP Appendices (Document Reference E4.1 and E4.2) are also provided with this application to demonstrate how consultation and engagement has been carried out to comply with these requirements. Consultation has been conducted with MMO regarding the requirements for other consents has been considered within Other Documents: Other Consents and Licenses (Document reference J1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		authority) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permitting Regulations requirements. Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for EPs and other consents., such as marine licenses. Wherever possible, applicants should submit applications for EPs and other necessary consents at the same time as applying to the Secretary of State for development consent.	
Secretary of state decision making	4.12.9 – 4.12.15	In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves. The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them. The Secretary of State's consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed marine licence. The Secretary of State and MMO, or NRW should cooperate closely to ensure that energy NSIPs are licensed in accordance with environmental legislation. In considering the impacts of the project, the Secretary of State may wish to consult the regulator on any management plans that would be included in an Environmental Permit application. The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	An Environmental Statement has been submitted for this application which catalogues the wide and thorough assessment undertaken across environmental, social and economic receptors, across all phases of the Morgan Generation Assets, which can be used to allow weighing of impacts and benefits in the decision-making process. Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (Document Reference F1.2) sets the legislative context, and Volume 1, Chapter 5: Environmental Impact Assessment methodology of the Environmental Statement (Document Reference F1.5) sets out the proportionate approach to assessment. Outline management plans have been submitted alongside the Environmental Statement as part of the application, and the Applicant has committed to measures to reduce any potential impacts (Document Reference J7 – J17).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Working in close cooperation with EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that: • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework • the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.	
Safety			
Applicant assessment	4.13.5 – 4.13.7	Applicants should consult with the HSE on matters relating to safety. Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority. If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents.	The Applicant has consulted with the HSE on matters relating to safety as demonstrated in the Consultation Report (Document Reference E3) and the Technical Engagement Plan (Document Reference E4). The Morgan Generation Assets is not anticipated to be considered a COMAH site because no hazardous substances used on site will exceed relevant COMAH thresholds.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Secretary of state decision making	4.13.8	The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objections.	The Applicant intends to apply for temporary 500 m safety zones around the major construction vessels and any future major operations and maintenance vessel activities. Safety Zones are included within the PDE and have been considered within Volume 2, Chapter 7: Shipping and Navigation of the Environmental Statement (Document Reference F2.7) and Volume 6, Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F6.7.1). Further information can be found in the Safety Zone Statement (Document Reference J5).
Hazardous substances			
Applicant Assessment	4.14.5 - 4.14.6	Applicants must consl the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety. HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant local planning authorities. The applicant should therefore consult the local planning authority at pre-application stage to identify whether its proposed site is within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send thlelevant HSA any information required by them for the purposes of a register.	The consultation with Hazardous Substances Authority and HSE are provided within the Consultation Report (Document reference E3) as well as under the submitted Technical Engagement Plan (TEP) (Document E4) and TEP Appendices (Document Reference E4.1 and E4.2).
Secretary of state decision making	4.14.7	Where hazardous substances consent is applied for, the Secretary of State will consider whether to make an order directing that hazardous substances consent shall be deemed to be granted alongside making an order	The Morgan Generation Assets is not anticipated to be considered a COMAH site because no hazardous substances used on site will exceed relevant COMAH thresholds.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		granting development consent. The Secretary of State should consult HSE about this.	
Security considerations			
Applicant assessment	4.16.6 – 4.16.7	Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks. The applicant should only include sufficient information in the application as is necessary to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application.	At this stage no national security implications have been identified for Morgan Generation Assets. The Applicant has prepared and submitted a thorough application in accordance with the Applicant's scoping report and the Scoping Opinion (Volume 3, annex 3.3 Scoping Opinion of the Environmental Statement (Document Reference F2.7)) and had due regard to consultation responses from statutory and non-statutory stakeholders (see the Consultation Report (Document Reference E3) and appendices.
Greenhouse gas emissions			
Applicant assessment	5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3 [of EN-1]). This should include: A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage.	Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of CO^2 emissions and other relevant greenhouse gases of the Morgan Generation Assets. This has assessed the project emissions across the whole life of the Morgan Generation Assets including the construction, operations and maintenance, and decommissioning phases. The chapter has included measures adopted as part of the Morgan Generation Assets which have concentrated on reducing GHG emissions to acceptable levels for the Morgan Generation Assets. The chapter concludes that there will be significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance phases. However, despite the high GHG emissions resulting from the construction-phase of the development, the magnitude of avoided

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	emissions resulting from the operational-phase of the development allows the Morgan Generation Assets to enable avoided emissions from the end of the tenth year of operation (carbon payback period) resulting in a beneficial net effect. The Morgan Generation Assets is in line with the NPS EN-3 principle of supporting new renewable and low carbon energy developments, in addition to their associated infrastructure, in order to contribute to reductions in GHG emissions and it is supported by national energy and climate change policy (including the National Infrastructure Strategy, Sixth Carbon Budget, Net Zero Strategy which highlight the need for an end to the use of unabated fossil fuel generation, whilst also significantly ramping up electricity generation capacity in order to meet the demands of increased electrification of transport, heat and industry. As such, government policy dictates that large-scale deployment of renewable energy generators such as the Morgan Generation Assets are necessary in order to meet GHG reduction targets. By facilitating the expansion of renewable energy supply, the Morgan Generation Assets would assist the UK Government target of achieving a fully decarbonised power system by 2035, and the aim to become net zero by 2050.
	5.3.5 – 5.3.7	A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero. Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning. Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the development consent order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland	Volume 2, Chapter 12: Climate change of the Environmental Statement (Document Reference F2.12) provides an assessment of CO^2 emissions and other relevant greenhouse gases of the Morgan Generation Assets. This has assessed the project emissions across the whole life of the Morgan Generation Assets including the construction, operations and maintenance, and decommissioning phases. The chapter has included measures adopted as part of the Morgan Generation Assets which have concentrated on reducing GHG emissions to acceptable levels for the Morgan Generation Assets.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		creation, peatland restoration and through other natural habitats.	
Biodiversity and Geological Conservation			
Applicant assessment	5.4.17 – 5.4.24	Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project. The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures. As set out in Section 4.6, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.5 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project. The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within	All designated sites with relevant ecology features which have the potential to be impacted by the Morgan Generation Assets as well as protected habitats and species have been identified in Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental State (Document Reference F4.2.1); Volume 4, Annex 3.1: Fish and Shellfish Ecology Technical Report of the Environmental Statement (Document Reference F4.3.1); Volume 4, Annex 4.1: Marine Mammals Technical Report of the Environmental Statement (Document Reference F4.4.1) and Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference F4.5.1). Assessment are contained within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3); Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). Geological features are identified and assessed in Volume 2, Chapter 1: Physical Processes of the Environmental Statement (Document Reference F2.1) and Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). An assessment has also been made under the submitted HRA Screening (Document Reference E1.4), the ISAA Part 1-3 (Document Reference E1.1 – E1.5) and Marine Conservation Zone Screening Assessment (Document Reference E2). The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted as part of the Morgan Generation Assets, including measures to preserve ecologically important features as well as broader measures included as part of the Mitigation and Monitoring Plan (Document Reference J6) and the Biodiversity Benefit Statement (Document Reference J18). These measures have been put in place to take advantage of opportunities to conserve ecological features of conservation interest. Measures to minimise disturbance to marine mammals and rafting birds (Document Reference J15) and the Outline Underwater Sounds Management Strategy (Document Reference J13);

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development. Energy projects will need to ensure vessels used by the project follow existing regulations and guidelines to manage ballast water.	Outline Vessel Traffic Management Plan (Document Reference J16) and an Outline Marine Mammal Mitigation Protocol (Document Reference J17) are also provided with this application. The potential effects on internationally and nationally designated sites for ecological or geological features of conservation importance have been identified and assessed for the Morgan Generation Assets in each of the relevant topic chapters and cumulatively assessed under Volume 2, Chapter 15: Inter-related Effects of the Environmental Statement (Document Reference F2.15). No locally designed sites have been identified. Ballast water management is also considered as part of the two (2) Deemed Marine Licences which are contained in the Draft DCO (Document Reference C1).
	5.4.25 – 5.4.31	The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to agree and record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects. If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of HRA sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations. If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably	The HRA Phase 1 Screening Report (Document Reference E1.4) satisfies the requirement to determine if AA is required. The Information to Support the Appropriate Assessments (ISAA) (Document Reference E1.1 to E1.3)) provide the information to enable the Secretary of State to conduct the AA. It concludes there is no Adverse Effect on Integrity (AEoI) and therefore no derogation case (or without prejudice derogation case) is required. Mitigation measures are contained within the Mitigation and Monitoring Schedule (Document Reference J6). Consultation and engagement is evidenced and summarised within the Consultation Report (Document E3) and the Technical Engagement Plan (TEP) (Document Reference E4) and TEP Appendices (Document Reference E4.1 and E4.2).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		possible and before the close of the examination. This information must include assessment of alternative solutions, a case for Imperative Reasons of Overriding Public Interest (IROPI) and appropriate environmental compensation. Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination. It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process. Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development.	
	5.4.32	Applicants should include measures to mitigate the direct and indirect effects of development on ancient woodland, veteran trees or other irreplaceable habitats during both construction and operational phase.	Effects of development on ancient woodland or veteran trees are not relevant to this project as it includes offshore generation infrastructure only. However, rreplacemable marine habitats have been considered within Volume 2, Chapter 2: Benthic Subtidal Ecology of the Environmental Statement (Document Reference F2.2) and none were identified.
	5.4.33 – 5.4.34	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.5.	The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of Morgan Generation Assets. Specific measures for biodiversity are set in the relevant topic chapters, such Volume 2, Chapter 2: Benthic subtidal ecology in the Environmental Statement (Document F2.2); Volume 2, Chapter 3: Fish and

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the government's strategy for nature for example.	shellfish ecology of the Environmental Statement (Document Reference F2.3) and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and also within the Biodiversity Benefit Statement (Document Reference J18).
	5.4.35 – 5.4.36	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works • the timing of construction has been planned to avoid or limit disturbance • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements • habitats will, where practicable, be restored after construction works have finished • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised.	Measures adopted as part of the Morgan Generation Assets throughout all phases are summarised in the Mitigation and Monitoring Schedule (Document Reference J6) and the Biodiversity Benefit Statement (Document Reference J18). Topic-specific chapters have assessed the effect of any measures relevant to the topic. The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of Morgan Generation Assets. Specific measures for biodiversity are set in the relevant topic chapters, such Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• mitigations required as a result of legal protection of habitats or species will be complied with. Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages. Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages. .	
Secretary of State decision making – Habitats Regulations	5.4.49	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans.	An assessment has been made under the submitted HRA Screening (Document Reference E1.4), the ISAA Part 1-3 (Document Reference E1.1 – E1.5) and Marine Conservation Zone Screening Assessment (Document Reference E2), to allow the SoS to make an assessment.
Secretary of State decision making – Marine Conservation Zones	5.4.51	The Secretary of State is bound by the duties on public authorities in relation to MCZs imposed by sections 125 and 126 of the Marine and Coastal Access Act 2009.	A Marine Conservation Zone Screening Assessment (Document Reference E2) has been submitted with this application.
Civil and Military Aviation and Defence Interests			

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Safeguarding	5.5.11	Aerodromes that are officially safeguarded will have officially produced plans that show the obstacle limitation surfaces (OLS). Care must be taken to ensure that new developments do not infringe these protected OLS, as these encompass the critical airspace within which key air traffic associated with the aerodrome operates.	Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) has carried out an Instrument Flight Procedures (IFP) assessment which considered all applicable safeguarded surfaces of those airfields potentially impacted.
Safeguarding	5.5.19	New energy infrastructure may cause obstructions in Ministry of Defence (MOD) low flying areas. A balance must be struck between defence and energy needs in these areas.	Consultation with the MoD has been carried out as identified in the Consultation Report (Document E3) and Consultation Report Appendices (Document Reference E3.1). Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) considers low flying activity within the establishment of the baseline.
Other defence interests	5.5.36	The Joint industry and government Air Defence and Offshore Wind Mitigation Task Force was set up to enable the co-existence of UK Air Defence and offshore wind. The Strategy and Implementation Plan sets the direction for that collaboration. The recommendations generated from this Task Force should be referred to by both aviation and energy stakeholders.	Mitigation of impacted aviation radar systems is considered with the completion of a radar line of sight analysis to establish impact and engagement with stakeholders and is summarised in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).
Applicant assessment	5.5.37 – 5.5.42	Where the proposed development may affect the performance of civil or military aviation communications, navigation and surveillance (CNS), meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3). The requirement for ATC and non-cooperative surveillance – i.e. radar/tracking–technologies - forms part of the environmental baseline for proposed developments. The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) has assessed the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets within the impact assessments. Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) provides the results of consultation activity which was carried out with all the mentioned consultees except Met Office as this was not included in the Regulation 11 list issued by PINS. A list of consultees and the approach to consultation is included in Appendix D.16 of the Consultation Report (Document Reference E3.3) and a full record of consultation is provided in the Consultation Report (Document Reference E3) and Consultation report annexes (Document Reference E3.1). The assessment of aviation flight patterns is provided in Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the project with other relevant projects in relation to aviation, meteorological and defence. In addition, consideration of developments near aerodromes should take into account the following factors: • Bir– Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary) • Building Induc–d Turbulence - If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plu–e Turbulence - This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these	Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) has assessed the cumulative impacts within the cumulative effect assessment. All relevant changes made during the pre-application period have been communicated to the relevant consultees a captured in the summary of key consultation issues tables provided in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft. If any relevant changes are made to proposals during the pre-application and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible.	
	5.5.43	The applicant should include appropriate mitigation measures as an integral part of the proposed development.	Measures adopted as part of the Morgan Generation Assets have been discussed during engagement with stakeholders and are included in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11). Mitigation Measures are contained within the Mitigation and Monitoring Schedule (Document Reference J6).
Secretary of State decision making	5.5.49	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	The assessment of civil and military aviation radar is provided in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) as supported by Volume 4, Annex 11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1). Other aviation and defence interests are discussed in the establishment of the baseline.
Secretary of State decision making	5.5.50	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar / tracking technologies. It may also be appropriate for operators of the aerodrome to examine the possibility of agreeing to make reasonable changes to operational procedures.	A baseline has been completed and is included in the IFP within Volume 4, Annex 4.11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1). The assessment is contained within Volume 2, Chapter 11: Aviation and Radar of the Environmental Statement (Document Reference F2.11). Mitigation of aviation radar systems is the subject of engagement with mitigation principles for each affected radar included in the assessment of effects.
Secretary of State decision making	5.5.51	When assessing the necessity, acceptability, and reasonableness of operational changes to aerodromes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the	A baseline of aviation flight patterns and their potential impact on defence and national security is provided in the IFP within Volume 4, Annex 4.11.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1). The assessment is contained within Volume 2, Chapter 11: Aviation and Radar of the Environmental Statement (Document Reference F2.11).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		cases put forward by all parties. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security.	
Secretary of State decision making	5.5.52	In the case of meteorological radars, the Secretary of State should consider the extent to which the provision of weather and flood warnings is compromised.	Meteorological radar is considered within Volume 4, Annex 9.1: Aviation and radar technical report of the Environmental Statement (Document Reference F4.11.1).
Secretary of State decision making	5.5.53	If there are conflicts between the government's energy and transport policies and military interests in relation to the application, the Secretary of State should expect the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible, recognising simultaneously the evolving landscape in terms of the UK's energy security and the need to tackle climate change, which necessitates the installation of wind turbines and the need to maintain air safety and national defence and the national weather warning service.	Consultation with the military authority is provided in the consultation table within Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).
Secretary of State decision making	5.5.54	There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that goes beyond statutory requirements by any of the relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape and ecology may be a relevant consideration.	The consideration of the fitment of aeronautical lighting is considered as measures adopted as part of the project and is provided in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).
Secretary of State decision making	5.5.55	Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be	

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		compatible with night vision devices for military low flying purposes.	
Secretary of State decision making	5.5.56	Where new technologies to mitigate the adverse effects of wind farms on surveillance systems, such as radar, are concerned, the Secretary of State should have regard to any government guidance which emerges from the joint government/Industry Aviation Management Board and the Joint Air Defence and Offshore Wind Task Force.	The impact of the Morgan Generation Assets radar and surveillance systems is assessed in Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11) as supported by Volume 4, Annex 9.1: Radar early warning technical report of the Environmental Statement (Document Reference F4.9.1)
Secretary of State decision making	5.5.57	Where suitable technological solutions have not yet been developed or proven, the Secretary of State will need to consider the likelihood of a solution becoming available within the time limit for implementation of the development consent.	The impact of the Morgan Generation Assets on radar and surveillance systems is assessed in Volume 4, Annex 9.1: Radar early warning technical report of the Environmental Statement (Document Reference F4.9.1) and Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11).
Secretary of State decision making	5.5.58	Where a proposed energy infrastructure development would significantly impede or compromise the safe and effective use of civil or military aviation, meteorological radars, defence assets and/or significantly limit military training, the Secretary of State may consider the use of 'Grampian conditions', or other forms of requirement which relate to the use of current or future technological solutions, to mitigate impacts on legacy CNS equipment.	
Coastal Change			
Applicant assessment	5.6.10 – 5.6.14	Where relevant, applicants should undertake coastal geomorphological and sediment transfer modelling to predict and understand impacts and help identify relevant mitigating or compensatory measures. The ES (see Section 4.2) should include an assessment of the effects on the coast, tidal rivers and estuaries. In particular, applicants should assess: • the impact of the proposed project on coastal processes and geomorphology, including by	An assessment of sediment dynamics has been undertaken and included within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1), informed by a technical assessment using the hydrodynamic and spectral wave modelling in Volume 4, Annex 1.1 Physical processes technical report of the Environmental Statement (Document Reference F4.1.1). In order to assess impacts to physical processes, post construction changes are assessed via the comparison of both baseline and post construction physical environments. The inclusion of climate change is also considered as a future baseline scenario within Volume 2, Chapter 1:

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		taking account of potential impacts from climate change. If the development will have an impact on coastal processes the applicant must demonstrate how the impacts will be managed to minimise adverse impacts on other parts of the coast • the implications of the proposed project on strategies for managing the coast as set out in Shoreline Management Plans (SMPs) (which provide a large-scale assessment of the physical risks associated with coastal processes and present a long term policy framework to reduce these risks to people and the developed, historic and natural environment in a sustainable manner), any relevant Marine Plans, River Basin Management Plans, and capital programmes for maintaining flood and coastal defences and Coastal Change Management Areas • the effects of the proposed project on marine ecology, biodiversity, protected sites and heritage assets • how coastal change could affect flood risk management infrastructure, drainage and flood risk • the effects of the proposed project on maintaining coastal recreation sites and features • the vulnerability of the proposed development to coastal change, taking account of climate change, during the project's operational life and any decommissioning period For any projects involving dredging or deposit of any substance or object into the sea, the applicant should consult the MMO and Historic England, or the NRW in Wales. Where a project has the potential to have a	Physical processes of the Environmental Statement (Document Reference F2.1). A cumulative effects assessment has also been included in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1) in order to assess the combined impact on physical processes with existing and future infrastructure. Designated sites and features of importance within the physical processes study area have been identified within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1), with supplementary information to inform appropriate assessment. The significance of effects on receptors associated with impacts to physical processes are likewise considered for the project alone, and within the cumulative effect assessment. The potential impacts of suspended sediment concentrations have been modelled, with their impacts on fish and shellfish ecology receptors assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). Impacts on coastal recreation sites are considered in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9). The application is accompanied by a HRA (Document Reference E1 – E1.5) and a Marine Conservation Zone Screening Assessment (Document Reference E2) to identify any effects of physical changes on the integrity and special features of Marine Protected Areas (MPAs).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		major impact in this respect, this is covered in the technology specific NPSs. For example, EN-4 looks further at the environmental impacts of dredging in connection with Liquified Natural Gas (LNG) tanker deliveries to LNG import facilities. The applicant should be particularly careful to identify any effects of physical changes on the integrity and special features of Marine Protected Areas (MPAs). These could include MCZs, HRA Sites including Special Areas of Conservation and Special Protection Areas with marine features, Ramsar Sites, Sites of Community Importance, and SSSIs with marine features. Applicants should also identity any effects on the special character of Heritage Coasts. Applicants must demonstrate that full account has been taken of the policy on assessment and mitigation in paragraphs 4.3.1 to 4.3.9 of this NPS, taking account of the potential effects of climate change on these risks.	
	5.6.15	Applicants should propose appropriate mitigation measures to address adverse physical changes to the coast, in consultation with the MMO, the EA or NRW, LPAs, other statutory consultees, Coastal Partnerships and other coastal groups, as it considers appropriate. Where this is not the case, the Secretary of State should consider what appropriate mitigation requirements might be attached to any grant of development consent.	Measures adopted as part of the Morgan Generation Assets have been discussed during consultation and adopted as part of the Environmental Statement, including measures such as scour protection, cable burial where possible, and cable protection. All these elements are included within the submitted Mitigation and monitoring schedule (Document Reference J6).
Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation			
Applicant assessment	5.7.5 – 5.7.7	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES. In particular, the assessment provided by the applicant should describe: • the type, quantity and timing of emissions	The scope and methodology of the assessment to address the impact on amenity are presented within Volume 4, Annex 10.4: Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement (Document reference: F4.10.4). Statutory Nuisance is also considered within the Statutory Nuisance Statement (Document Reference J4).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• aspects of the development which may give rise to emissions • premises or locations that may be affected by the emissions • effects of the emission on identified premises or locations • measures to be employed in preventing or mitigating the emissions The applicant is advised to consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment.	
	5.7.9	Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in DCO requirements.	The processes and methods adopted by the applicant to mitigate and reduce emissions during the construction and operational phase are presented in Volume 1, Chapter 3: Project Description (Document Reference F1.3); the Mitigation and Monitoring Schedule (Document reference: J6) as well as the Offshore In-principle Monitoring Plan (Document J11).
Flood Risk			
Applicant assessment	5.8.13 – 5.8.21	A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals. This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account. Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage	The application is entirely offshore therefore Flooding is not a relevant matter. However, specific topic assessment are included within the relevant Environmental Statement topic chapters to identify and assess the risk of potential flooding including climate change on relevant receptors and consultation with relevant bodies was carried out as evidenced within the Consultation Report (Document Reference E3) and Technical Engagement Plan (Document Reference E4). Baseline and post-construction physical processes are detailed in Volume 4, Annex 1.1: Physical processes technical report of the Environmental Statement (Document Reference F4.1.1), whilst climate change is discussed in section 1.5.3 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). A Cumulative Effects Assessment (CEA) has been undertaken and is outlined in section 1.11 of Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		undertakers, navigation authorities, highways authorities and reservoir owners and operators. Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed. If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	Flooding and Climate change effects of the proposed project on the range of offshore receptors are assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement, Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement, Volume 2, Chapter 4: Marine mammals of the Environmental Statement and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement.
	5.8.24	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	Not relevant this project as this relates solely to offshore.
Historic environment			
Applicant assessment	5.9.9 – 5.9.10	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these in the ES (see Section 4.2). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	All potential impacts to marine archaeology receptors have been described and assessed within Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). An assessment on seascape and historic landscapes is contained within Volume 2, Chapter 10: Seascape, Landscape and Visual Resources of the Environmental Statement (Document Reference F2.10). Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8) includes a cumulative effects assessment and considers the potential for the introduction of the development to have a negative impact on the Historic Seascape Character of the development area.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	
	5.9.12 – 5.9.13	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected. The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected.	Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8) includes an assessment of indirect impacts, including sediment disturbance and distribution and alteration of sediment transport regimes.
Landscape and Visual			
Applicant assessment	5.1019 – 5.10.22	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	These have been considered in Volume 2, Chapter 10: Seascape, landscape and visual resources impact assessment methodology of the Environmental Statement (Document reference: F2.10) and details of the baseline are included within Volume 4, Annex 4.10: Seascape and Landscape Character Baseline Technical Report (Document Reference F.4.10).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONBs the assessment should include effects on the natural beauty and special qualities of these areas'. The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation. The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	
Noise and Vibration			
Applicant assessment	5.12.6 – 5.12.9	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive, low frequency or temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment	Underwater sound impacts have been assessed within Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement (Document Reference F3.3.1). Other noise impacts are assessed within the Airbourne Construction Sound Technical Report of the Environmental Statement (Document Reference F4.14.1) and Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS

		• a prediction of how the noise environment will change with the proposed development
		  ○ in the shorter term, such as during the construction period
		  ○ in the longer term, during the operating life of the infrastructure
		  ○ at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year
		• an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and well-being where appropriate, and noise-sensitive areas
		• if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise
		• all reasonable measures to be employed in mitigating the effects of noise using best available techniques to reduce noise impacts
		Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.
		Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any	

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		relevant British Standards and other guidance which also give examples of mitigation strategies.	
	5.12.11 – 5.12.12	In the marine environment, applicants should consider noise impacts on protected species, both at the individual project level and in-combination with other marine activities. Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	The underwater sound impacts have been assessed within Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement (Document Reference F3.3.1). Impacts on protected species are assessed within the HRA (Document Reference E1.1 - E1.5) and the Marine Conservation Zone Screening Assessment (Document Reference E2). Mitigation is contained within the Mitigation and monitoring schedule (Document Reference J6).
Socio-Economic Impacts			
Applicant assessment	5.13.2 – 5.13.7	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3). The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities. The applicant's assessment should consider all relevant socio-economic impacts. Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies. Socio-economic impacts may be linked to other impacts, for example visual impacts considered in	Potential impacts at local and regional levels have been assessed within Volume 2, Chapter 13: Socio-economics of the Environmental Statement (Document reference F2.13). Statutory consultation has been carried out with all relevant local authorities and non-statutory consultation sessions with potential interest in the project. The assessment considers potential economic impacts (employment, GVA, and labour market) impacts, potential social impacts (housing, accommodation and local services), potential tourism impacts, and potential impacts associated with disruption to lifeline ferry services to the Isl151aselyn. The baseline conditions cover the relevant geographies potentially impacted by the project. The policy review section considers how the Morgan Generation Asset's socio-economic impacts correlate with local, regional, and national planning policies.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain. Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	
Resource and Waste Management			
	5.15.8 – 5.15.13	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities. If the applicant's assessment includes dredged material, the assessment should also include other uses of such material before disposal to sea, for example through reuse in the construction process. The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible. Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused.	An Offshore environmental management plan (OEMP) covering the period of construction and operation will be submitted post-consent. This will include details of waste management and disposal arrangements, including marine pollution under the marine pollution contingency plan. Contractors will be required to follow the best practice measures within the Code of Construction Practice and OEMP (when finalised). On that basis, the potential impacts arising from the disposal and recovery of waste during construction of the Morgan Generation Assets are unlikely to give rise to significant effects. Procedures for handling waste materials will be set out in the OEMP submitted post-consent and secured through the Draft DCO (Document Reference C1). Further information on the offshore EMP is provided in Volume 1, Chapter 5 EIA methodology of the Environmental Statement.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Water Quality and Resources			
Applicant assessment	5.16.3 – 5.16.7	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent. The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation. Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones – this could include, for example, the use of protective barriers. The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting	Potential health effects relating to water are considered in section 14.4.2 of Volume 2, Chapter 14: Human health assessment of the Environmental Statement (Document Reference F2.14), as informed by Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement Document Reference F2.2). Impacts on physical characteristics of the water environment are included within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). An OEMP submitted post-consent and secured through the Draft DCO (Document Reference C1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future any cumulative effects.	

A.1.2.3 EN-3 NPS Accordance

Table 1.29: NPS EN-3 Accordance.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Introduction	1.1.7	Applicants should, therefore, ensure that their applications and any accompanying supporting documents and information are consistent with the instructions and guidance in this NPS, EN-1 and any other NPSs that are relevant to the application in question.	This NPS tracker sets out how the Morgan Generation Assets application for consent is consistent with the relevant NPSs.
Infrastructure covered by this NPS	1.6.1	This NPS covers the following types of nationally significant renewable electricity generating stations: • energy from biomass and/or waste including mixed waste containing non-renewable fractions (>50 MW in England and >350MW in Wales); • pumped hydro storage (>50 MW in England and >350MW in Wales); • solar photovoltaic (PV) (>50 MW in England and >350MW in Wales); • offshore wind (>100MW in England and >350MW in Wales); and • tidal stream (>100MW in England and >350MW in Wales).	The Morgan Generation Assets is an offshore wind farm with a capacity over 100MW in England's waters.
General Assessment and Technology Specific Information			
Relationship with English and Welsh renewables policies	2.2.1-2.2.2	Policy set out in existing planning guidance in England and, for any proposed project located in Wales, in relevant planning policy and advice issued by the Welsh Government, will provide important information to applicants of nationally significant renewable energy projects. Applicants should take these policies and guidance (including any relevant targets) into account and explain	Relevant policies and guidance are presented in each topic specific chapter of the Environmental Statement with details on how the Morgan Generation Assets align with the guidance or policies.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		how their proposals fit with guidance or, alternatively, why they depart from them.	
Factors influencing site selection and design			
National designations	2.3.6	In sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), consent for renewable energy projects should only be granted where the relevant tests in Sections 5.4 and 5.10 of EN-1 are met and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits.	Site selection and designated areas have been considered in Volume 1: Introductory Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document reference: F1.4) and the Marine Conservation Zone Scrfeening Assessment (Document Reference E2). All designated sites with relevant ecology features which have the potential to be impacted by the Morgan Generation Assets as well as protected habitats and species have been identified in Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental State (Document Reference F4.2.1); Volume 4, Annex 3.1: Fish and Shellfish Ecology Technical Report of the Environmental Statement (Document Reference F4.3.1); Volume 4, Annex 4.1: Marine Mammals Technical Report of the Environmental Statement (Document Reference F4.4.1) and Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference F4.5.1). Assessment are contained within Volume 2, Chapter 2: Benthic Subtidal Ecology of the Environmental Statement (Document Reference F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3); Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). Geological features are identified and

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			assessed in Volume 2, Chapter 1: Physical Processes of the Environmental Statement (Document Reference F2.1) and Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8).
Seabed Leasing	2.3.10 – 2.3.12	The Crown Estate owns and manages the seabed out to the 12 nm territorial limit in England, Wales and Northern Ireland. The seabed around Scotland is managed by Crown Estate Scotland. As well as owning the rights to explore and utilise waters up to 12nm, the Energy Act 2004 gives The Crown Estate rights to issue leases for development beyond the territorial limit and within the REZ. Applicants must obtain a lease from The Crown Estate or Crown Estate Scotland prior to placing any offshore structures on, or passing cables over, the seabed and its foreshore.	The Applicant entered into Agreement for Lease for the Morgan Generation Assets in early 2023.
Marine Licensing	2.3.16	Marine Licences are required for all the marine elements of a proposed offshore development (up to Mean High Water Springs), including associated development such as the cabling and any offshore substations that are required, and any other matters the MMO may consider relevant under s69 of the Marine and Coastal Access Act 2009.	As the Morgan Generation Assets is an offshore generating station with a capacity of greater than 100MW it is a Nationally Significant Infrastructure Project (NSIP) as defined by Section 15(3) of the Planning Act 2008 (as amended) (the 2008 Act). Infrastructure will be consented under the deemed marine licences of the DCO. Two (2) deemed marine licences are required before carrying out any licensable marine activity under the Marine and Coastal Access Act 2009.
	2.3.19	Marine Licences are required for all the marine elements of a proposed offshore development (up to Mean High Water Springs), including associated development such as the cabling and any offshore substations that are required, and any other matters the MMO may consider relevant under s69 of the Marine and Coastal Access Act 2009.	
Offshore Wind	2.4.8	Whilst offshore wind farms will not be affected by flooding, applicants should demonstrate that any necessary land-side infrastructure (such as cabling and onshore substations) will be appropriately resilient to climate-change induced weather phenomena. Similarly, applicants should	Morgan Generation Assets solely refers to offshore elements and therefore there is no land-side infrastructure to be considered under this paragraph.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		particularly set out how the proposal would be resilient to storms.	
Consideration of good design for energy infrastructure	2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	Co-existence with other marine users and infrastructure is considered in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9). Project mitigation has been considered and included where necessary within each of the relevant Environmental Statement chapters, in particular Volume 2, Chapter 2: Benthic Subtidal Ecology of the Environmental Statement (Document Reference F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3); Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) regarding ecology and Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8) regarding heritage. The Morgan Generation Assets are functional infrastructure and the range of design alternatives have been considered through the iterative EIA process as set out within the Volume 1: Introductory Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).
Flexibility in the project details	2.6.1 – 2.6.3	Where details are still to be finalised applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case. Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the project design envelope including the elements yet to be finalised, and each topic-specific assessment has taken a maximum design scenario approach.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Full guidance on how applicants and the Secretary of State should manage flexibility is set out in Section 4.3 of EN-1.	
General Assessment and Technology Specific Information	2.1.8	The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including SNCBs, both before and at the formal pre-application stage.	This NPS tracker (Document Reference J2.1) and the Planning Statement (Document Reference J2) set out how the Morgan Generation Assets complies with EN-1 as it is an identified CNP and establishing the need for renewable and diversified electricity generation. The approach to the mitigation hierarchy and mitigation measures are presented in the Mitigation and Monitoring Schedule (Document Reference J6)
Secretary of State's approach to HRA derogations for CNP Infrastructure	3.8.17 – 3.8.20	Any HRA residual impacts will continue to be considered under the framework set out in the Habitats Regulations. Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations In doing so, the Secretary of State will consider the particular circumstances of any application, but start from the position that energy security and decarbonising the power sector to combat climate change: • requires a significant number of deliverable locations for CNP Infrastructure and for each location to maximise its capacity. There are no limits to how many such locations may be required. Therefore, the existence of another deliverable location to meet the need for CNP Infrastructure should not be treated as an alternative solution. Further, the existence of another way of developing the proposed site which results in a significantly lower generation capacity should not be treated as an alternative solution; and	The HRA has been undertaken in the HRA Stage 1 Screening report (Document Reference E1.4), HRA Stage 2 ISAA Part 1 – Intro and background (Document Reference E1.1), HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), HRA Stage 2 ISAA Part 3 – SPA assessments (Document Reference E1.3). The conclusions of the ISAA (ref) are that there would be no adverse effect on integrity and therefore no derrogation case is required under the Habitats Regulations.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• are capable of amounting to imperative reasons of overriding public interest (IROPI) for CNP Infrastructure, which relate to human health, public safety, and/or beneficial consequences of primary importance to the environment. Where an applicant has shown there are no alternative solutions, and that there are IROPI, compensatory measures must be secured to offset the adverse effects to site integrity as part of a derogation.	
Factors influencing site selection and design Offshore Energy Strategic Environmental Assessment	2.8.14– 3.8.26	In proposing sites for offshore wind, NSIP applicants should demonstrate that their choice of site takes into account the government's Offshore Energy SEA 4 and any successors to it. The government is undertaking a rolling Offshore Energy SEA programme, including a research programme and data collection to facilitate future strategic and project specific assessments to achieve the 50GW ambitions.	Details of how the site was chosen, as well as the alternatives studied and reasons for final selection are presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).
Marine Planning	2.8.16 – 2.8.18	Marine planning currently enables the increasing demands for use of the marine area to be balanced and managed in an integrated way that protects the marine environment whilst supporting sustainable development. Marine plans provide a transparent framework for consistent, evidence-based decision making and should be used by applicants to guide site selection. Marine plans will help applicants understand generic potential impacts of their proposal at an early stage e.g., in relation to other activities, or where there are marine protected areas. Further information is provided in Section 4.5 of EN-1.	All relevant Marine Plans and guidelines and how the Morgan Generation Assets aligned with them are outlined in offshore topic chapters of the Environmental Statement and clearly idenified and referenced in the Planning Statatement (Document Reference J2).
Seabed leasing	2.8.20	The Crown Estate issues leases for offshore wind farms in tendering rounds. Applicants must obtain a lease prior to placing an offshore wind structure on, or passing transmission export cables over, the seabed and its foreshore (see section 2.3.10 of this NPS for information in seabed leasing and capacity extensions).	The Applicant entered into Agreement for Lease for the Morgan Generation Assets in early 2023.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
	2.8.22 – 2.8.24	To date, each offshore wind leasing round has been supported by a plan level HRA, which assesses the impact of the leasing round on protected sites. The assessment serves to provide a better understanding of the potential effects and identify measures which can be put in place to avoid, mitigate, or reduce those significant effects at a plan level. Where an assessment concludes that there will still be an adverse impact, a case for derogation can be considered. This must meet strict legal tests, which includes identifying compensatory measures.	The HRA has been undertaken in the HRA Stage 1 Screening report (Document Reference E1.4), HRA Stage 2 ISAA Part 1 – Intro and background (Document Reference E1.1), HRA Stage 2 ISAA Part 2 – SAC assessments (Document Reference E1.2), HRA Stage 2 ISAA Part 3 – SPA assessments (Document Reference E1.3). The conclusions of the ISAA (ref) are that there would be no adverse effect on integrity and therefore no derrogation case is required under the Habitats Regulations.
Wind resource	2.8.28 – 2.8.30	Available wind resource is critical to the economics of a proposed offshore wind farm. To inform their economic modelling applicants may collect wind speed data using an anemometry mast or similar. Collection of this data is not obligatory as the suitability of the wind speed across the site and economics of the scheme are a matter for the technical and commercial judgement of the wind farm applicant not the Secretary of State.	Site specific wind resource data has been collected via the deployment of a floating LiDAR buoy since March 2022
Water depth and foundation conditions	2.8.31 – 2.8.33	Water depth, bathymetry and geological conditions are all important considerations for the selection of sites and will affect the design of the foundations of the turbines, the layout of turbines within the site and the siting of the cables that will export the electricity. The onus is on the applicant to ensure that the foundation design is technically suitable for the seabed conditions and that the application caters for any uncertainty regarding the geological conditions. Whilst the technical suitability of the foundation design is not in itself a matter for the Secretary of State, the Secretary of State will need to be satisfied that the foundations will not have an unacceptable adverse effect on	Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the project design envelope including the elements yet to be finalised, and each topic-specific assessment has taken a maximum design scenario approach.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		marine biodiversity, the physical environment or marine heritage assets.	
Offshore-onshore connection	2.8.34 – 2.8.36, and 2.8.38 – 2.8.39	As identified in paragraphs 3.3.65 - 3.3.83 and Section 4.11 of EN-1, and Section 2.12 of EN-5, a more co-ordinated approach to offshore-onshore transmission is required. The previous standard approach to offshore-onshore connection involved a radial connection between single windfarms projects and the shore. A coordinated approach will involve the connection of multiple, spatially close, offshore windfarms and other offshore infrastructure as relevant to onshore networks. This will include connections via multi-purpose interconnectors (MPIs), which combine the connection of offshore wind with the function of market to market interconnectors. As part of the transition to more co-ordinated transmission, it is anticipated that some proposals for transmission could be consented separately to those for the windfarm (array) application. For this to occur, an applicant will need to make a request to the Secretary of State. The Secretary of State would then decide whether to give direction under Section 35 of the Planning Act 2008.	In accordance with the UK Government published the 'Pathway to 2030 Holistic Network Design' in 2022 it was set out the approach to connecting 50 GW of offshore wind to the National Grid. A key output of the HND process was the conclusion that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. However, Morgan Generation Assets relates to the offshore generation elements only with the offshore-onshore connection forming part of a separate DCO.
Offshore Wind – Applicant's assessment	2.8.44	There may be constraints imposed on the siting or design of offshore wind farms because of the presence of other offshore infrastructure, such as oil and gas, Carbon Capture, Usage and Storage (CCUS), co-location of electrolysers for hydrogen production, marine aggregate dredging, telecommunications, or activities such as aviation and recreation.	The baseline environment considering other offshore infrastructure and activities is presented in Volume 2, Chapter 9: Other Sea Users of the Environmental Statement (Document Reference F2.9). Section 9.4.4includes consultation with potentially affected stakeholders, which has been carried out from the early stages of the Morgan Generation Assets and has continued throughout the pre-application consultation process. Details of this are presented in Table 9.4These have allowed the identification of potential constrains in compliance with this Paragraph.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Other offshore infrastructure and activities	2.8.46	Applicants should consult the Government's Marine Plans (further detailed in Section 4.5 of EN-1) which are a useful information source of existing activities and infrastructure	All relevant Marine Plans and guidelines and how the Morgan Generation Assets aligned with them are outlined in offshore topic chapters of the Environmental Statement and clearly idenified and referenced in the Planning Statatement (Document Reference J2).
	2.8.47	Prior to the submission of an application involving the development of the seabed, applicants should engage with The Crown Estate to ensure they are aware of any current or emerging interests on or underneath the seabed which might give rise to a conflict with a specific application. This will ensure adequate opportunity to reduce potential conflicts and increase time to find a resolution.	A full baseline and future baseline environment considering current and emerging interests is presented in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9). Consultation has taken place with key stakeholders throughout the EIA process.
	2.8.48	Applicants are encouraged to work collaboratively with those other developers and sea users on co-existence/co-location opportunities, shared mitigation, compensation and monitoring where appropriate. Where applicable, the creation of statements of common ground between developers is recommended. Work is ongoing between government and industry to support effective collaboration and find solutions to facilitate to greater co-existence/co-location.	A full baseline and future baseline environment considering current and emerging interests is presented in Volume 2, Chapter 9: Other sea users of the Environmental Statement (Document Reference F2.9). Consultation has taken place with key stakeholders throughout the EIA process. A range of fishers operating within the vicinity of the Morgan Generation Assets have been consulted on potential impacts and mitigation strategies and assessed in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).
	2.8.49	As an interested party, The Crown Estate may also provide further supporting information and evidence as part of the examination. This guidance is to encourage early engagement between parties with a potential overlap in their development plans so that a solution can be found that optimises the capacity of the UKCS to enable net zero.	Engagement with The Crown Estate was carried out as part of the pre-application engagement for the project and the results are contained within the Consultation Report (Document Reference E3) and Consultation Report Appendices (Document Reference E3.1).
	2.8.50	The applicant will also need to consider impacts on civil and military radar and other aviation and defence interests (Section 5.5 of EN-1).	The assessment of civil and military aviation radar is provided in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			Other aviation and defence interests are discussed within the description of the aviation and radar study areas provided in Volume 4, Chapter 1: Aviation and radar of the Environmental Statement (Document Reference F4.1).
Marine Protected Areas	2.8.52 – 2.8.53	Given the scale of offshore wind deployment required to meet 2030 and 2050 ambitions, applicants will need to give close consideration to impacts on MPAs, either alone or in combination, in addition to mitigation measures and/or compensation (both individually and in combination with other plans or projects) which may be needed to approve their projects. It is likely that mitigation may include proactive measures to reduce the impact of deployment e.g., micrositing of offshore transmission routes to avoid vulnerable habitats, alternatives piling or trenching techniques, noise abatement technology, collision avoidance methods or, if necessary, compensation for habitat loss. See Section 2.8.80 for Offshore Wind Environmental Standards.	All designated sites with relevant ecology features which have the potential to be impacted by the Morgan Generation Assets as well as protected habitats and species have been identified in Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental State (Document Reference F4.2.1); Volume 4, Annex 3.1: Fish and Shellfish Ecology Technical Report of the Environmental Statement (Document Reference F4.3.1); Volume 4, Annex 4.1: Marine Mammals Technical Report (Document Reference F4.4.1) and Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement (Document Reference F4.5.1). Assessment are contained within Volume 2, Chapter 2: Benthic Subtidal ecology of the Environmental Statement (Document Reference F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3); Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4) and Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5). Geological features are identified and assessed in Volume 2, Chapter 1: Physical Processes of the Environmental Statement (Document Reference F2.1) and Volume 2, Chapter 8: Marine Archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). An assessment has also been made under the submitted HRA Screening (Document Reference E1.4), the ISAA Part 1-3 (Document Reference E1.1 – E1.5) and Marine Conservation Zone Screening Assessment (Document Reference E2)

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted as part of the Morgan Generation Assets, including measure to preserve ecologically important features such as the development of an environmental management plan. These measures have been put in place to take advantage of opportunities to conserve ecological features of conservation interest. Measures are detailed within the Mitigation and monitoring schedule (document reference J6)
	2.8.55 – 2.8.56	The British Energy Security Strategy has committed to introducing mechanisms to support strategic compensatory measures, including for projects already in the consenting process (where possible), to offset environmental impacts and reduce delays to individual projects. Only once all feasible alternatives and mitigation measures have been employed, should applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity. Applicants are expected to seek advice from SNCBs and Defra for projects in England, in conjunction with relevant regulators, Local Planning Authorities and/or landowners, on potential mitigation and/or compensation requirements at the earliest opportunity and comply with future statutory requirements and/or guidance once available.	An ISAA has been carried out (Document Reference E1.1 – E1.3). A HRA has been undertaken in the HRA Stage 1 Screening report (Document Reference E1.4) and HRA Integrity Matrices (Document Reference E1.5). These documents have concluded that there are no AEoI and therefore no compensation and derogation case required.
Technical considerations			
Network connection	2.8.59 – 2.8.60	Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem. The co-ordination of transmission is supported by regulatory	In accordance with the UK Government published the 'Pathway to 2030 Holistic Network Design' in 2022 it was set out the approach to connecting 50 GW of offshore wind to the National Grid. A key output of the HND process was the conclusion that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		changes to enable this as part of the Offshore Transmission Network Review. As co-ordinated offshore transmission development may sometimes occur separate to that for wind farm development (under reforms including through strategic network design exercises - see next paragraph), it is expected that an initial agreement will be reached regarding connection with the offshore transmission network developer (or operator) and/or connection into the onshore transmission network.	in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. However, Morgan Generation Assets relates to the offshore generation elements only with the network connection forming part of a separate DCO.
	2.8.64 – 2.8.66	Where applicants seek consent for offshore transmission infrastructure separately from proposals for offshore wind development, for example Multi-Purpose Interconnectors or subsea 'onshore' transmission also referred to as bootstraps, (see Glossary and 2.12.3 in EN-5), consideration should be given at a strategic level to the overall environmental impacts of the offshore development and transmission infrastructure. Early planning can help avoid the location of either windfarm or transmission infrastructure pushing the other into areas where environmental impacts could be increased. The location of arrays and transmission infrastructure should be assessed strategically (especially where they are not covered by the same consent or marine licences), and the mitigation hierarchy should be used to address any environmental impact.	Details of how the site was chosen are presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). Cumulative effects have been identified and assessed in the Cumulative effects screening matrix and each assessment chapter of the Environmental Statement (Document Reference F2.15) and required mitigation is included within the Mitigation and Monitoring Schedule (Document Reference J6).
	2.8.67 – 2.8.70	In addition, the applicant is expected to define the precise route for offshore transmission infrastructure, including the wind farm export cable to the offshore transmission network connection point or onshore connection point, the onshore and offshore locations of any associated infrastructure such as substations or the location of bootstraps/ subsea 'onshore' transmission. Please refer to definitions of offshore transmission in EN-5 at 2.12.3 – 2.12.6.	Details of how the site was chosen are presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). The impacts of the cable are identified and assessed within the Environmental Statement and the details of the Cable Route is contained within Grid Connection and Cable Detail Statement (Document J3). Cumulative effects have been identified and assessed in the Cumulative effects screening annex and each

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		The 167pplicantt should assess the effects of the offshore transmission and any associated infrastructure on the marine, coastal and onshore environment. Where the applicant does not know the precise location of the offshore transmission cables and any associated infrastructure, a corridor should be identified within which the specific infrastructure is proposed to be located. The ES for the proposed project should assess the effects of including this infrastructure within that corridor.	individual assessment chapter of the Environmental Statement (Document Reference FXX).
	2.8.71 – 2.8.73	Applicants are expected to demonstrate compliance with mitigation measures identified by The Crown Estate in any plan-level HRA produced as part of its leasing rounds and with any future statutory requirements, guidance or mitigation measures developed to deliver the commitments in the British Energy Security Strategy, including on Offshore Wind Environmental Standards. Assessment of environmental effects of cabling infrastructure and any proposed offshore or onshore substations should assess effects both alone and cumulatively with other existing and proposed infrastructure. Applicants should include details on how avoidance has been achieved, good design principles have been followed and provide proposals for mitigation, as well as demonstrating that they have considered how their proposals can contribute towards environmental net gain. Further information is provided in Sections 4.3, and 4.5 to 4.7 of EN-1.	An assessment has been made under the submitted HRA Screening (Document Reference E1.4), the ISAA Part 1-3 (Document Reference E1.1 – E1.3) and Marine Conservation Zone Screening Assessment (Document Reference E2). The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted as part of the Morgan Generation Assets, including measures to preserve ecologically important features as well as broader measures included as part of the Mitigation and monitoring schedule (Document Reference J6) and the Biodiversity Benefit Statement (Document Reference J18). Cumulative effects have been identified and assessed in the Cumulative effects screening annex and each individual assessment chapter of the Environmental Statement.
Flexibility in the project details	2.8.74 – 2.8.75	Owing to the complex nature of offshore wind farm development, many of the details of a proposed scheme may be unknown to the applicant at the time of the application to the Secretary of State. Such aspects may include:	Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3) sets out the project design envelope including the elements yet to be finalised, and each topic-specific assessment has taken a maximum design scenario approach.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• the precise location and configuration of turbines and associated development; • the foundation type and size; • the installation technique or hammer energy; • the exact turbine blade tip height and rotor swept area; • the cable type and precise cable route; • the exact locations of offshore and/or onshore substations. Guidance on how applicants should manage flexibility is set out at 2.6 of this NPS and 4.2 of EN-1.	
Micrositing and microrouting	2.8.77 – 2.8.79	To inform micrositing/microrouting applicants should undertake high-resolution survey work and make provision for investigative work, such as archaeological examination, to assess the impacts of any proposed cables or foundation placement on potential archaeological assets. Applicants should submit an outline archaeological Written Scheme of Investigation (WSI) as part of the DCO submission, with a commitment to complete a project-specific WSI post-consent in consultation with Historic England. Where the applicant requests micrositing or microrouting tolerance, and insofar as it is reasonably possible to do so, the applicant should factor this tolerance into the environmental impact assessment of the development's worst-case scenario.	An outline archaeological Written Scheme of Investigation (Document Reference J14) has been submitted with the application for consent. Tolerance has been factored into the environmental impact assessment of the development's worst case scenario or maximum design scenario.
Repowering	2.8.82	Applicants must submit a new consent application for any repowering of an existing site, this would be subject to EIA and HRA, and MCZ assessment where applicable.	N/A as this is an application for a new offshore wind farm.
Future monitoring	2.8.83 – 2.8.87	Where requested by the Secretary of State applicants are required to undertake environmental monitoring (e.g. ornithological surveys, geomorphological surveys,	Any monitoring being considered by the Applicant is presented in the Offshore in-principle Monitoring Plan (Document Reference J11) and the Mitigation and

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		archaeological surveys) prior to and during construction and operation. Monitoring must measure and document the effects of the development and the efficacy of any associated mitigation or compensation. This will enable an assessment of the accuracy of the original predictions and improve the evidence base for future mitigation and compensation measures enabling better decision-making in future EIAs and HRAs. Monitoring should be presented in formal reports which must be made publicly available. Where appropriate, applicants are also encouraged to consider monitoring collaboratively with other developers and sea users. Work is ongoing between government and industry to support effective collaboration.	Monitoring Schedule (Document Reference J6) submitted with the application for consent.
Decommissioning	2.8.88 – 2.8.89	Section 105 of the Energy Act 2004 enables the Secretary of State to require the submission of a decommissioning programme for a proposed offshore wind farm, provided at least one of the statutory consents required (including one under the 2008 Act) has been given or has been applied for and is likely to be given. Where requested by the Secretary of State, applicants should submit a decommissioning programme, satisfying the requirements of s.105(8) of the Energy Act 200442 before any offshore construction works begin, to demonstrate a commitment to ensure any long-term environmental impacts are removed following decommissioning.	Decomissioning impacts have been assessed as part of the Environmental Statement in each of its topic chapters and the applicant has made a commitment to provide a Decomissioning Strategy as part of the Draft DCO (Document Reference C1). .
Offshore wind environmental standards	2.8.90 – 2.8.92 -	As part of the Offshore Wind Environmental Improvement Package set out in the British Energy Security Strategy, government committed to establishing Offshore Wind Environmental Standards (OWES; previously referred to as Nature Based Design Standards) to accelerate deployment whilst offering greater protection of the marine environment. OWES aim to support developers to take a more consistent approach to avoiding, reducing, and mitigating the impacts	Details on how the proposal complies with relevant and adopted guidance is included within Volume 1, Chapter 3: Project Description of the Environmental Statement (Document Reference F1.3) and the submitted Planning Statement (Document Reference J2).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		of an offshore wind farm and/or offshore transmission infrastructure. The measures could apply to the design, construction, operation and decommissioning of offshore wind farms and offshore transmission (as defined in EN-5 at section 2.12). Defra will consult on a series of OWES before drafting clear OWES Guidance, which sets out where and how Defra expects each measure to be applied to a development. Once the OWES Guidance is issued, the Secretary of State will expect applicants to have applied the relevant measures to their applications. Applicants should explain how their proposals comply with the guidance or, alternatively, the grounds on which a departure from them is justified. Any reasons for departure from the OWES should be fully detailed within the application documents, with details of any agreements made with statutory consultees	
Impacts	2.7.35	Applicants should provide information on relevant impacts as directed by this NPS and the Secretary of State.	All relevant impacts are identified and assessed within the Environmental Statement.
Biodiversity and ecological conservation	2.11.35 - 2.11.36	In addition, applicants should have regard to the specific ecological and biodiversity considerations that pertain to proposed offshore wind infrastructure developments, namely: • fish; • intertidal and subtidal seabed habitats and species; • marine mammals; • birds; and • wider ecosystem impacts and interactions, such as foodwebs. Applicants must undertake a detailed assessment of the offshore ecological, biodiversity and physical impacts of their proposed development, for all phases of the lifespan of that development, in accordance with the appropriate policy	A detailed assessment of the offshore ecological, biodiversity and physical impacts of the proposed development in all stages of development has been carried out and the identification and assessment is contained in the relevant chapters of the Environmental Statement, in particular in Benthic subtidal ecology of the Environmental Statement (Volume 2, Chapter 2, Document Reference F2.2); Fish and Shellfish (Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3)); Marine Mammals (Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4)) and Offshore Ornithology (Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5)). The Morgan Generation Assets will aim to conserve habitats through a number of measures adopted to reduce the impact of the Morgan Generation Assets including

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		for EIAs, HRAs and MCZ assessments (See Sections 4.3 and 5.4 of EN1).	measures to preserve ecologically important features such as the development of an environmental management plan. These measures have been put in place to take advantage of opportunities to conserve ecological features of conservation interest. The potential effects on internationally, nationally and locally designated sites for ecological or geological features of conservation importance have been identified and assessed for the Morgan Generation Assets. The HRA Stage 1 Screening report (Document Reference E1.4) screening identifies direct or indirect effects on sites which could be affected, and those sites is assessed in the Information to Support Appropriate Assessment (ISAA) (Document Reference E1.1 to E1.3). A MCZ Screening Assemsment has also been produced and it is submitted with the application (Document Reference E2).
	2.11.49 – 2.11.40	Applicants need to consider environmental and biodiversity net gain as set out in Section 4.5 of EN-1 and the Environment Act 2021. Applicants should assess the potential of their proposed development to have net positive effects on marine ecology and biodiversity, as well as negative effects.	Both potential negative and positive effects on marine ecology have been considered in the relevant topic chapters, such Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document F2.2); Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).. As an onshore metric Biodiversity Net Gain is not relevant for this application however Morgan Generation Assets is supported by a Biodiversity Benefits Statement (Document Reference J18).
	2.8.104 – 2.8.106	Applicants should consult at an early stage of pre-application with relevant statutory consultees and energy not-for profit organisations/non-governmental organisations as appropriate, on the assessment methodologies, baseline data collection, and potential avoidance, mitigation and compensation options which should be undertaken	Consultation has been undertaken through the Evidence Plan process for marine ecology and HRA topics. Consultation on specific topics is presented in the topic chapters and the Technical Engagement Plan (Document Reference E4).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		In developing proposals applicants must refer to the most recent best practice advice originally provided by Natural England under the Offshore Wind Enabling Action Programme , and/or their relevant SNCB. Any relevant data that has been collected as part of postconstruction ecological monitoring from existing operational offshore wind farms should be referred to where appropriate.	
	2.8.107	A range of research programmes are ongoing to investigate impacts of offshore wind farm development, including, but not limited to: BEIS SEA Research Programme, ORJIP, ScotMER, the ORE Catapult and OWEC. Applicants should explain why their decisions on siting, design, and impact mitigation are proportionate and well-targeted, referring to relevant scientific research and literature.	Each topic chapter of the Environmental Statement refers to relevant scientific research and literature. The EIA Methodology is included as Volume 1, Chapter 5: EIA Methodology of the Environmental Statement (Document Reference F1.5). The location and site selection process for the Morgan Generation Assets infrastructure is presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4).
	2.8.108	Applicants are expected to have regard to guidance issued in respect of Marine Licence requirements.	Two Deemed Marine Licences form part of this DCO application included as part of the Draft DCO (Document Reference C1). Regard to Marine Licence requirements have been addressed in the Indicative Extent of Marine Licences (Document Reference B4).
	2.11.42	Applicants should have regard to Good Environmental Status (GES) under the UK Marine Strategy.	With regard to the duties in relation to Good Environmental Status (GES) of marine waters, all protected habitats and species that have the potential to be impacted by the Morgan Generation Assets have been identified and considered in the Environmental Statement. Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (document reference F2.2) sets out each relevant MSFD descriptor of GES in relation to benthic subtidal ecology and how it has been considered within the Environmental Statement.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			The Morgan Generation Assets will aim to conserve habitats and species through a number of measures adopted to reduce the impact of the Morgan Generation Assets including measures to preserve ecologically important features as well as broader measures such as the development of an Offshore environmental management plan. Measures adopted by the Morgan Generation Assets to halt the decline in species abundance are included within the chapters of the Environmental Statement and Mitigation and Monitoring Schedule (Document Reference J6)
	2.8.110	The British Energy Security Strategy contains a commitment to reviewing the Habitats Regulation Assessment process for offshore wind farm developments and powers are included in the Energy Act 2023 to implement this through secondary legislation. Further guidance will be published as a separate document setting out what information assessments must contain. Once final guidance is published, applicants will be expected to comply.	Habitat Regulation processes have been considered and assessed as part of the HRA Phase 1 Screening (Document Reference E1.4), the ISAA Part 1-3 (Document Reference E1.1 – E1.3) and Marine Conservation Zone Screening Assessment (Document Reference E2).The project has been prepared in line and in compliance with the guidance which was in place at the time of preparation of this submission.
Physical environment	2.8.111 – 2.8.113	The construction, operation and decommissioning of offshore energy infrastructure (including the preparation and installation of the cable route) can affect the following elements of the physical offshore environment, which can have knock on impacts on other biodiversity receptors: water quality – disturbance of the seabed sediments or release of contaminants can result in direct or indirect effects on habitats and biodiversity, as well as on fish stocks thus affecting the fishing industry; waves and tides – the presence of the turbines can cause indirect effects through change to wave climate and tidal currents on flood defences, marine ecology and biodiversity, marine archaeology and potentially coastal recreation activities;	The significance of effects during the installation of foundations and associated site preparation activities are detailed within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1), with respect to relevant receptors, and existing/future infrastructure associated with other developments. Procedures of installation will be undertaken in line with best practice techniques and with respect to relevant guidance to ensure sediment mobilisation is minimised. Both baseline and post-construction scenarios that characterise the sediment transport regime have been modelled and presented within the Environmental Statement. Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2)

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		scour effect – the presence of wind turbines and other infrastructure can result in a change in the water movements within the immediate vicinity of the infrastructure, resulting in scour (localised seabed erosion) around the structures. This can indirectly affect navigation channels for marine vessels, marine archaeology and impact biodiversity and seabed habitats; sediment transport – the resultant movement of sediments, such as sand across the seabed or in the water column, can indirectly affect navigation channels for marine vessels, could affect sediment supply to sensitive coastal sites and impact biodiversity and seabed habitats; suspended solids – the release of sediment during construction, operation and decommissioning can cause indirect effects on marine ecology and biodiversity; sandwaves – the modification/clearance of sandwaves can cause direct physical and ecological effects both at the seabed and within the water column due to disturbance and suspension of sediment, and potentially indirect effects (e.g. changes to seabed morphology in water depths where waves can influence the seabed, which can in turn affect wave climate and sediment transport; and water column – wind turbine structures can also affect water column features such as tidal mixing fronts or stratification due to a change in hydrodynamics and turbulence around structures. Applicant assessments are expected to include predictions of the physical effects arising from modifications to hydrodynamics (waves and tides), sediments and sediment transport, and sea bed morphology that will result from the construction, operation and decommissioning of the required infrastructure. Assessments should also include effects such as the scouring that may result from the proposed development and how that might impact sensitive species and habitats.	provides a full assessment of the habitats within the Morgan Generation Assets benthic subtidal ecology study area including indirect effects from changes in physical processes such as waves, tides, and sediment transport. These assessments are completed using information provided in Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
	2.8.114	Applicants should undertake geotechnical investigations as part of the assessment, enabling the design of appropriate construction techniques to minimise any adverse effects.	Geophysical surveys were undertaken, alongside other site-specific surveys, in order to support modelling and the technical assessment associated with Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1).
Fish	2.8.150 – 2.8.151	The applicant should identify fish species that are the most likely receptors of impacts with respect to: • spawning grounds; • nursery grounds; • feeding grounds; • over-wintering areas for crustaceans; • migration routes; and • protected sites. Applicant assessments should identify the potential implications of underwater noise from construction and unexploded ordnance including, where possible, implications of predicted construction and soft start noise levels in relation to mortality, permanent threshold shift (PTS), temporary threshold shift (TTS) and disturbance and addressing both sound pressure and particle motion) and EMF on sensitive fish species.	The baseline for habitats for fish and shellfish, have been identified in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (Document Reference F4.3.1) and assessed in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).
Marine Mammals	32.8.129	If construction and associated noise levels are likely to lead to an offence under Part 3 of the Habitats Regulations (which would include deliberately disturbing, injuring or killing), applicants will need to apply for a wildlife licence to allow the activity to take place.	A HRA Phase 1 Screening Report is provided as Document Reference E1.4 and HRA Screening Matrices included as Document Reference E1.5. Underwater sound modelling is presented within Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement (F3.3.1). The effects on marine mammals have been assessed in Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). The effects on fish and shellfish are considered within Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
			Baseline noise levels, predicted noise levels in relation to mortality, Permanent Threshold Shift (PTS) and Temporary Threshold Shift (TTS) and disturbance, soft-start noise levels according to proposed hammer and pile design, and operational sound are all considered within Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).
	2.8.131 – 2.8.132 –	Where necessary, assessment of the effects on marine mammals should include details of: • likely feeding areas and impacts on prey species and prey habitat; • known birthing areas/haul out sites for breeding and pupping; • migration routes; • protected sites; • baseline noise levels; • predicted construction and soft start noise levels in relation to mortality, permanent threshold shift (PTS), temporary threshold shift (TTS) and disturbance; • operational noise; • duration and spatial extent of the impacting activities including cumulative/in-combination effects with other plans or projects; • collision risk; • entanglement risk; and • barrier risk. The scope, effort and methods required for marine mammal surveys should be discussed with the relevant SNCB.	Likely feeding areas, known birthing areas/haul out sites; known migration or commuting routes are identified within Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1). Important protected areas for marine mammals are discussed in Volume 4, Annex 4.1: Marine mammal technical report of the Environmental Statement (Document Reference F4.4.1). Collision risk and barrier risk is considered within Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4). The scope of the assessment on marine mammals has been discussed with SNCBs through the Evidence Plan process and results of the discussions are contained within the Consultation Report (Document Reference E3).
	2.8.133 – 2.8.135	The applicant should discuss any proposed noisy activities with the relevant statutory body and must reference the joint	The Morgan Generation Assets piling activity is discussed in Volume 2, Chapter 4: Marine mammals of the

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		JNCC and SNCB underwater noise guidance in relation to noisy activities (alone and in-combination with other plans or projects) within HRA sites, in addition to the JNCC mitigation guideline to piling, explosive use, and geophysical surveys. Where the assessment identifies that noise from construction and UXO clearance may reach noise levels likely to lead to noise thresholds being exceeded (as detailed in the JNCC guidance) or an offence as described in paragraph 2.8.138 above, the applicant will be expected to look at possible alternatives or appropriate mitigation. The applicant should develop a Site Integrity Plan (SIP) to allow the cumulative impacts of underwater noise to be reviewed closer to the construction date, when there is more certainty in other plans and projects.	Environmental Statement (Document Reference F2.4), and appropriate measures adopted as part of the Morgan Generation Assets to minimise the potential for an offence, along with those specific to construction, operations and maintenance and decommissioning are discussed. Any necessary mitigation is contained within the Mitigation and Monitoring Schedule (Document Reference J6). Underwater sound modelling is presented within Volume 3, Annex 3.1: Underwater sound technical report of the Environmental Statement (F3.3.1) and an Outline Underwater Sound Management Strategy is provided as Document Reference J13.
Birds	2.8.137 – 2.8.140	Currently, cumulative impact assessments for ornithology are based on the consented Rochdale Envelope parameters of projects, rather than the 'as-built' parameters, which may pose a lower risk to birds. The applicant must ensure any draft consents include provisions to define the final 'as built' parameters (which may not then be exceeded). These parameters must be used in future cumulative impact assessments. In parallel the Government will look to explore opportunities to reassess ornithological impact assessment of historic consents to reflect their 'as built' parameters. Any ornithological 'headroom' between the effects defined in the 'as built' parameters and Rochdale Envelope parameters can then be released.	A HRA Phase 1 Screening Report is provided as Document Reference E1.4 and HRA Screening Matrices included as Document Reference E1.5. The ISAA Part 3 (Document Reference E1.3) contains the SPA assessments. Cumulative impact assessments are presented in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) for all relevant species and inter-related effects are contained within Volume 2, Chapter 15: Inter-related effects of the Environmental Statement (Document Reference F2.15).
	2.8.141	Applicants are encouraged to make appropriate applications for amendments to development consent to secure reduced parameters and ornithological impacts.	Not relevant to this application.
	2.8.143	Applicants should discuss the scope, effort and methods required for ornithological surveys with the relevant	Baseline survey methods have been discussed with Natural England, Joint Nature Conservation Committee

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		statutory advisor, taking into consideration baseline and monitoring data from operational windfarms.	(JNCC) and the Royal Society for the Protection of Birds (RSPB) through the Evidence Plan Process EWG.
	2.8.144 – 2.8.145	Applicants must undertake collision risk modelling, as well as displacement and population viability assessments for certain species of birds. Advice can be sought from SNCBs. Where necessary, applicants should assess collision risk using survey data collected from the site at the pre-application EIA stage.	Potential impacts on offshore ornithology are assessed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and relevant technical report annexes.
Subtidal habitats and species	2.8.123 – 2.8.124	The applicant should demonstrate compliance with mitigation measures identified by The Crown Estate in any plan-level HRA produced as part of its leasing round. Applicants should follow guidelines for leasing transmission assets infrastructures, and any successor to it produced by the Crown Estate.	A HRA has been produced for the application (Document Reference E1.1 – 1.5). Measures adopted as part of the Morgan Generation Assets have been discussed during consultation as evidenced in the Consultation Report (Document Reference E3). Mitigation is contained within the Mitigation and Monitoring Schedule (Document Reference J6).
	2.8.125	All work associated with cable installation including trenching, laying and surface protections are licenced through a Deemed Marine Licence as part of the DCO. In all offshore windfarm cases however, applicants should be aware that the operation and maintenance of cables after construction may require new Marine Licences.	The Applicant will apply for two (2) Marine Licences as part of the DCO (included as part of the Draft DCO Document Reference C1) as and when required throughout the lifetime of the Morgan Generation Assets however operation and maintenance of cables is included within the application for consent.
	2.8.126	Applicant assessment of the effects on the subtidal environment should include: • loss of habitat due to foundation type including associated seabed preparation, predicted scour, scour protection and altered sedimentary processes, e.g. sandwave/boulder/UXO clearance; • environmental appraisal of inter-array and export cable routes and installation/maintenance methods, including predicted loss of habitat due to predicted scour and scour/cable protection and sandwave/boulder/UXO clearance;	The procedures associated with the installation of infrastructure and seabed preparation is considered with respect to best practice techniques and relevant guidance, within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). The assessment of potential construction, operations/ maintenance, and decommissioning impacts was informed by technical modelling undertaken and presented in the Environmental Statement. This considered the impact of suspended sediments and subsequent deposition particularly those related to cable installation activities.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		• habitat disturbance from construction and maintenance/repair vessels' extendable legs and anchors; • increased suspended sediment loads during construction and from maintenance/repairs; • predicted rates at which the subtidal zone might recover from temporary effects; • potential impacts from EMF on benthic fauna; • protected sites; and • potential for invasive/non-native species introduction.	Changes to bathymetry associated with depressions left by jack-up vessels were considered to be very limited and as a result were scoped out of the assessment. The impact of suspended sediments, long term habitat loss and temporary habitat disturbance from cable installation and maintenance as well as anchors and vessel legs (i.e. jack-up legs) has been quantified in the MDS. The effect of these impacts on the habitats within the Morgan Generation Assets Array Area and Morgan Generation Assets Offshore Cable Corridor and Access Areas has then been assessed throughout Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2).
Commercial fisheries and fishing	2.8.156 – 2.8.157	Whilst the footprint of an offshore wind farm and any associated infrastructure may be a hindrance to certain types of commercial fishing activity such as trawling, other fishing activities, such as potting, may be able to take place within operational wind farms without unduly disrupting or compromising navigational safety. Applicants should consider guidance on best practice for fisheries liaison, which has been jointly agreed by the renewables industry and fishing community. In some circumstances, transboundary issues may be a consideration as fishing vessels from other coastal States may fish in waters within which offshore wind farms are sited. Applicants should seek advice from Defra in such circumstances.	Potential impacts to commercial fisheries and cumulative effects are described Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). Liaison is ongoing with the fishing industry through the Company Fisheries Liaison Officer (CFLO) and Fishing Industry Representative (FIR) and good practice guidance with regards to fisheries liaison is being adhered to (Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6)). Engagement details are contained within the Consultation Report (Document Reference E3). An Outline Fisheries Liaison and Co-existence Plan is provided as Document Reference J10. Transboundary issues have been described in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), where consideration has been given to both UK and non-UK fishing fleets.
	2.8.158	Applicants will be expected to undertake dialogue with the fishing industry during the planning and design of individual	Through dialogue with the fishing industry, the Applicant is undertaking measures to minimise the effects upon the fishing industry in the region, through appropriate

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		offshore wind farm proposals to maximise the potential for co-existence/co-location and reduce potential displacement.	mitigation where required. Commitments related to commercial fisheries and adopted as part of Morgan Generation Assets are provided in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). Mitigation is contained within the Mitigation and Monitoring Schedule (Document Reference J6).
	2.8.157	Applicant assessments should include robust baseline data and detailed surveys of the effects on fish stocks of commercial interest and any potential reduction in such stocks, as well as any likely constraints on fishing activity within the project's boundaries.	Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3) outlines the potential impacts on fish stocks, including those of commercial interest. Robust baseline fisheries activity data has been collated from official sources and through consultation. The robust baseline datasets that have been analysed include UK and non-UK landings statistics, spatial data and published reports, all of which have been supplemented by industry consultation, as described in Volume 4, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F4.6.1). Where data sources allow, a 10-year trend analysis has been undertaken, using the most recent annual datasets available at the time of writing.
	2.8.162 - 2.8164	In some circumstances, applicants may seek declaration of safety zones around wind turbines and other infrastructure. Although these might not be applied until after consent to the wind farm has been granted. The declaration of a safety zone excludes or restricts activities within the defined sea areas including commercial fishing. Where there is a possibility that safety zones will be sought applicant assessments should include potential effects on commercial fishing. Where the precise extents of potential safety zones are unknown, a realistic worst-case scenario should be assessed. Applicants should consult the Maritime and Coastguard Agency (MCA) as part of this process.	A Safety Zone Statement is provided with the application (Document Reference J5). Implications from the implementation of safety zones have been presented in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3). There will be temporary 500 m safety zones around the major construction vessels and any future major operations and maintenance vessel activities. Safety zones are included within the project design and have been considered within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7) and Volume 2, Chapter 6: Commercial Fisheries of the Environmental Statement (Document Reference F2.6) .

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Marine historic environment	2.8.168-2.8.171	Applicants should consult with the relevant statutory consultees, such as Historic England or Cadw, on the potential impacts on the marine historic environment at an early stage of development during pre-application, taking into account any applicable guidance (e.g., offshore renewables protocol for archaeological discoveries). Assessment of potential impacts upon the historic environment should be considered as part of the Environmental Impact Assessment process undertaken to inform any application for consent. Desk based studies to characterise the features of the historic environment that may be affected by a proposed development and assess any likely significant effects should be undertaken by competent archaeological experts. These studies should consider any geotechnical or geophysical surveys that have been undertaken to aid the wind farm design.	Key consultation with statutory consultees such as Historic England is presented in Volume 2, Chapter 8: Marine archaeology of the Environmental Statement (Document Reference F2.8) as well as detailed within the Consultation Report (Document Reference E3). Impacts upon the historic environment are presented in Volume 2, Chapter 8: Marine Archaeology of the Environmental Statement (Document Reference F2.8).
	2.8.173 - 2.8.177	Applicants are required to determine how any known heritage assets might best be avoided. The applicant will be expected to conduct all necessary examination and assessment exercises using a variety of survey techniques to plan the development so as to optimise opportunities for avoidance. Once a site has been chosen, it may be necessary to undertake further archaeological assessment, including field evaluation, to identify as yet unknown heritage assets when considering the options for detailed site development, which may also include ancillary matters, such as those described in Section 5.9 of EN-1. Assessment may also include the identification of any beneficial effects on the marine historic environment, for	The avoidance of heritage assets and assessment of effects on the marine historic environment is presented in Volume 2, Chapter 8: Marine archaeology of the Environmental Statement of the Environmental Statement (Document Reference F2.8).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		example through improved access or the contribution to new knowledge that arises from investigation. Where elements of a proposed project (whether offshore or onshore) may interact with historic environment features that are located onshore, applicants should assess the effects in accordance with Section 5.9 in EN-1.	
Offshore wind impacts: navigation and shipping	2.8.179	To ensure safety of shipping applicants should reduce risks to navigational safety to as low as reasonably practicable (ALARP) as described in Section 2.8.331 of this NPS.	An NRA has been undertaken and is provided in Volume 4, Annex 7.1 of the Environmental Statement (Document Reference F4.7.1). The NRA demonstrates that all risks associated with the Morgan Generation Assets are either Broadly Acceptable or ALARP.
	2.8.183 – 2.8.185	There may be some situations where reorganisation of shipping traffic activity might be both possible and desirable when considered against the benefits of the wind farm and/or offshore transmission application, and such circumstances should be discussed with the government officials, including Secretary of State and Maritime and Coastguard Agency (MCA), and other stakeholders, including Trinity House, as The General Lighthouse Authority consultee, and the commercial shipping sector. It should be recognised that alterations might require national endorsement and international agreement and that the negotiations involved may take considerable time and do not have a guaranteed outcome. Applicants should engage with interested parties in the navigation sector early in the pre-application phase of the proposed offshore wind farm or offshore transmission to help identify mitigation measures60 to reduce navigational risk to ALARP, to facilitate proposed offshore wind development. This includes the MMO or NRW in Wales, MCA, the relevant General Lighthouse Authority, such as Trinity House, the relevant industry bodies (both national and local) and any representatives of recreational users of the sea, such as the Royal Yachting Association (RYA), who may be affected. This should continue throughout the	Significant consultation has been undertaken through the Marine Navigation Engagement Forum (MNEF), individual meetings, hazard workshops and written correspondence. These are summarised in the NRA (Volume 4, Annex 7.1 of the Environmental Statement (Document Reference F4.7.1)) and in the Consultation Report (Document Reference E3). Through this engagement feedback has been received on the impacts of the Morgan Generation Assets on different receptors, and as a result, substantial alterations were made to the Morgan Generation Assets design to minimise these impacts.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		life of the development including during the construction, operation and decommissioning phases. Engagement should seek solutions that allow offshore wind farms, offshore transmission, and navigation and shipping users of the sea to co-exist successfully	
	2.8.187 – 2.8.188	Prior to undertaking assessments applicants should consider information on internationally recognised sea lanes, which is publicly available. Applicants should refer in assessments to any relevant, publicly available data available on the Maritime Database.	The NRA utilises a number of different datasets of shipping and navigation activities and features across the Shipping and Navigation Study Area (see Volume 4, Annex 7.1 of the Environmental Statement (Document Reference F4.7.1)). The proximity of the Traffic Separation Schemes in the Irish Sea and it is concluded that there are no significant effects.
	3.8.204 - 3.8.205	Applicants should undertake a Navigational Risk Assessment (NRA) in accordance with relevant government guidance prepared in consultation with the MCA and the other navigation stakeholders listed above. The navigation risk assessment will for example necessitate: a survey of vessel traffic in the vicinity of the proposed wind farm; a full NRA of the likely impact of the wind farm on navigation in the immediate area of the wind farm in accordance with the relevant marine guidance; and cumulative and in-combination risks associated with the development and other developments (including other wind farms) in the same area of sea. In some circumstances, applicants may seek declaration of a safety zone around wind turbines and other infrastructure. Although these might not be applied until after consent to the wind farm has been granted.	An NRA has been undertaken and is provided in Volume 4, Annex 7.1 of the Environmental Statement (Document Reference F4.7.1). The NRA follows MCA guidance MGN654 and the International Maritime Organizations (IMO) Formal Safety Assessment. The NRA includes detailed vessel traffic data collection and analysis for the Shipping and Navigation Study Area (and with data durations in excess of MGN654 requirements). A Safety Zone Statement is provided with the application (Document Reference J5). A Cumulative Regional NRA (CRNRA) has also been undertaken to assess the impacts of the Morgan Generation Assets in combination with the Morgan and Morecambe Generation Assets and other Tier 1 and Tier 2 projects. The CRNRA is available in Volume 4, Annex 7.1: Navigational Risk Assessment of the Environmental Statement (Document Reference F4.7.1).
	2.8.192 – 2.8.194	The declaration of a safety zone excludes or restricts activities within the defined sea areas including navigation and shipping.	The requirement for safety zones during construction and major maintenance activities have been considered within the NRA (Volume 4, Annex 7.1 of the Environmental

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Where there is a possibility that safety zones will be sought applicant assessments should include potential effects on navigation and shipping. Where the precise extents of potential safety zones are unknown, a realistic worst-case scenario should be assessed. Applicants should consult the MCA and refer to the government guidance on safety zones as a part of this process.	Statement (Document Reference F4.7.1)). A Safety zone statement (Document Reference J5) has been submitted with the application for consent.
Other offshore infrastructure and activities	2.8.196 - 2.8.199	The scale and location of future offshore wind development around England and Wales means that development has occurred, and will continue to occur, in or close to areas where there is other offshore infrastructure. Where a potential offshore wind farm is proposed close to existing operational offshore infrastructure or has the potential to affect activities for which a licence has been issued by government, the applicant should undertake an assessment of the potential effects of the proposed development on such existing or permitted infrastructure or activities. The assessment should be undertaken for all stages of the lifespan of the proposed wind farm in accordance with the appropriate policy and guidance for offshore wind farm EIAs. Applicants should use marine plans (paragraph 2.8.27 of this NPS and Section 4.4 of EN-1) in considering which activities may be most affected by their proposal and thus where to target their assessment.	Impacts associated with the construction, operations/maintenance and decommissioning phases are described and assessed alongside designated receptors within Volume 2, Chapter 9: Other Sea Users of the Environmental Statement (Document Reference F2.9). Additionally, potential cumulative impacts with existing and future infrastructure have been included in a cumulative effects assessment that has also been undertaken as part of the Environmental Statement. Assessments have been undertaken with consideration to the appropriate policy and relevant guidance, including those of the NPS, which are presented in Volume 3, Annex 5.1: Cumulative effects screening matrix of the Environmental Statement.
	2.8.200 – 2.8.203	Applicants should engage with interested parties in the potentially affected offshore sectors early in the pre-application phase of the proposed offshore wind farm, with an aim to resolve as many issues as possible prior to the submission of an application. (see paragraphs 2.8.55 and 2.8.277 of this NPS for further guidance).	Consultation activities were undertaken for each topic, wherein stakeholders could raise issues or agreement with the approach or evidence used within the Environmental Statement, as demonstrated in each topic chapter and contained within the Consultation Report (Document Reference E3) and Technical Engagement Plan (Document Reference E4).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Such stakeholder engagement should continue throughout the life of the development including construction, operation and decommissioning phases where necessary. As many offshore industries are regulated by government, the relevant Secretary of State should also be a consultee where necessary. Such engagement should be taken to ensure that solutions are sought that allow offshore wind farms and other uses of the sea to successfully co-exist.	Relevant stakeholders have been consulted prior to application and the expert working groups. A range of fishers operating within the vicinity of the projects have been consulted on potential impacts and mitigation strategies. Consultation with other marine stakeholders has been ongoing throughout the EIA process.
Seascape and visual effects	2.8.207 – 2.8.212	Applicants should follow relevant guidance including, but not limited to seascape and landscape character assessments, landscape sensitivity assessments,and marine plan seascape character assessments (e.g., NRW Marine Character Areas (with associated guidance)England's marine plans . Where a proposed offshore wind farm will be visible from the shore and would be within the setting of a nationally designated landscape with potential effects on the area's statutory purpose a seascape, landscape and visual impact assessment (SLVIA) should be undertaken in accordance with the relevant offshore wind farm EIA policy and the latest Offshore Energy SEA, including the White 2020 report. The SLVIA should be proportionate to the scale of the potential impacts. This will always be the case where a coastal National Park, the Broads or AONB, or a Heritage Coast or their setting is potentially affected. Where necessary, assessment of the seascape should include an assessment of four principal considerations on the likely effect of offshore wind farms on the coast: • the limit of visual perception from the coast under poor, good and best lighting conditions; • the effects of navigation and hazard prevention lighting on dark night skies; • individual landscape and visual characteristics of the coast and the special qualities of designated landscapes, such as World Heritage Sites and National Parks, which limits the coast's	An assessment of the impacts on seascape, including photomontages and a cumulative assessment are presented in Volume 2, Chapter 10: Seascape, landscape and visual resources of the Environmental Statement (Document Reference F2.10) and associated annexes. Similarly, an assessment of the impacts on landscape, including photomontages and a cumulative assessment are presented in Volume 2, Chapter 10: Seascape and visual resources of the Environmental Statement (Document Reference F2.10) and associated annexes.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		capacity to absorb a development; and • how people perceive and interact with the coast and natural seascape. As part of the SLVIA, photomontages will be required. Viewpoints to be used for the SLVIA should be selected in consultation with the statutory consultees at the EIA Scoping stage. Applicants should assess the magnitude and significance of change to both the identified seascape receptors (such as seascape and landscape units, visual receptors and the special qualities of designated landscapes) in accordance with the standard methodology for SLVIA. Where appropriate, cumulative SLVIA should be undertaken in accordance with the policy on cumulative assessment outlined in Section 5.10.16-17 of EN-1.	
Mitigation			
General	2.8.213 – 2.8.217	Applicants must always employ the mitigation hierarchy, in particular to avoid as far as is possible the need to find compensatory measures for coastal, inshore and offshore developments affecting HRA sites and/or MCZs. It is essential that applicants involve SNCBs and Defra as early as possible in the planning process to enable discussions of what is and isn't a significant and/or adverse effect, subsequent implications, and if required, mitigation and/or compensation. At the earliest possible stage alternative ways of working and use of technology should be employed to avoid environmental impacts. For example, construction vessels may be rerouted to avoid disturbing seabirds. Where impacts cannot be avoided, measures to reduce and mitigate impacts should be employed, for example using trenching techniques or noise abatement technology. Only once all feasible alternatives and mitigation measures have been employed, should applicants explore possible compensatory measures to make good any remaining significant adverse effects to site integrity.	Relevant SNCBs and other stakeholders have been consulted prior to application, and the expert working groups as evidenced in the Consultation Report (Document Reference E3) and Annex 3.1 (Document Reference E3.1). Mitigation measures are contained within the Mitigation and Monitoring Schedule (Document Reference J6).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Where several developers are likely to have cumulative impacts on the same species or feature it may be appropriate to collaborate on mitigation and compensation measures.	
Biodiversity and ecological conservation	2.8.221 – 2.8.223	Applicants are advised to develop an ecological monitoring programme to monitor impacts during the pre-construction, construction and operational phases to identify the actual impacts caused by the project and compare them to what was predicted in the EIA/HRA. Should impacts be greater than those predicted, an adaptive management process may need to be implemented and additional mitigation required, to ensure that so far as possible the effects are brought back within the range of those predicted. Monitoring should be of sufficient standard to inform future decision-making. Increasing the understanding of the efficacy of alternatives and mitigation will deliver greater certainty on applicant requirements.	Monitoring and Mitigation measures are contained within the Mitigation and Monitoring Schedule (Document Reference J6) which also includes ecological monitoring where necessary.
Physical environment	2.8.224 – 2.8.225	Applicants are expected to have considered the best ecological outcomes in terms of potential mitigation. These might include: • avoidance of areas sensitive to physical effects; • consideration of micro-siting of both the array and cables; • alignment and density of the array; • design of foundations; • ensuring that sediment moved is retained as locally as possible; • the burying of cables to a necessary depth; • using scour protection techniques around offshore structures to prevent scour effects or designing turbines to withstand scour, so scour protection is not required or is minimised.	Measures adopted as part of the Morgan Generation Assets have been discussed during consultation as evidenced in the Consultation Report (Document Reference E3) and the Technical Engagement Plan (document Reference E4) and adopted as part of the Environmental Statement and are presented as part of the Mitigation and Monitoring Schedule (Document Reference J6).

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Applicants should consult the statutory consultees on appropriate mitigation and monitoring.	
Marine mammals	2.8.237 – 2.8.239	Monitoring of the surrounding area before and during the piling procedure can be undertaken by various methods including marine mammal observers and passive acoustic monitoring. Active displacement of marine mammals outside potential injury zones can be undertaken using equipment such as acoustic deterrent devices. Soft start procedures during pile driving may be implemented. This enables marine mammals in the area disturbed by the sound levels to move away from the piling before physical or auditory injury is caused. Where noise impacts cannot be avoided, other mitigation should be considered, including alternative installation methods and noise abatement technology, spatial/temporal restrictions on noisy activities, alternative foundation types. Applicants should undertake a review of up-to-date research and all potential mitigation options presented as part of the application, having consulted the relevant JNCC mitigation guidelines.	Mitigation and monitoring specific to marine mammals is presented in the Mitigation and Monitoring Schedule (Document Reference J6) and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (Document Reference F2.4).
Birds	2.8.240	Aviation and navigation lighting should be minimised and/or on demand (as encouraged in EN-1 Section 5.5) to avoid attracting birds, taking into account impacts on safety. Subject to other constraints, wind turbines should be laid out within a site, in a way that minimises collision risk.	Potential impacts upon and measures adopted as part of the Morgan Generation Assets for offshore ornithology are assessed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5) and in the Mitigation and Monitoring Schedule (Document Reference J6). Aviation lighting is considered as primary mitigation with specific details provided in the aviation and radar chapter (Volume 2, Chapter 11: Aviation and radar of the Environmental Statement (Document Reference F2.11)).
	2.8.241 - 2.8.244	Turbine parameters should also be developed to reduce collision risk where the assessment shows there is a significant risk of collision (e.g., altering rotor height).	Potential impacts upon and measures adopted as part of the Morgan Generation Assets for offshore ornithology are assessed in Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (Document Reference F2.5)

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		Construction vessels and post-construction maintenance vessel traffic associated with offshore wind farms should, where practicable and compatible with operational requirements and navigational safety, avoid rafting seabirds during sensitive periods and follow agreed navigation routes to and from the site and minimise the number of vessel movements overall. The exact timing of peak migration events is inherently uncertain, although research is ongoing into estimates for peak migration periods for a number of bird species and detection technologies (e.g. using radar and integrated sensors) are improving. Currently, shutting down turbines within migration routes during estimated peak migration periods is unlikely to offer suitable mitigation, but this might be a possibility in the future.	and in the Mitigation and Monitoring Schedule (Document Reference J6).
Fish	2.8.245 – 2.8.247	EMF in the water column during operation, is in the form of electric and magnetic fields, which are reduced by use of armoured cables for interarray and export cables. Burial of the cable increases the physical distance between the maximum EMF intensity and sensitive species. However, what constitutes sufficient depth to reduce impact will depend on the geology of the seabed. It is unknown whether exposure to multiple cables and larger capacity cables may have a cumulative impact on sensitive species. It is therefore important to monitor EMF emissions which may provide the evidence to inform future EIAs.	The burial depths, and any cable protection specifications, have been examined in the MDS (Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Document Reference F2.3), with specific impacts of EMFs assessed and mitigation measures are contained within the Mitigation and Monitoring Schedule (Document Reference J6).
	2.8.249	Construction of specific elements can also be timed to reduce impacts on spawning or migration. Underwater noise mitigation can also be used to prevent injury and death of fish species.	Measures adopted as part of the Morgan Generation Assets throughout all phases are summarised in the Mitigation and Monitoring Schedule (Document Reference J6) and an Outline Underwater Sound Management Strategy (Document reference J13) is provided with the application to comply with this Paragraph.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Commercial fisheries and fishing	2.8.250 - 2.8251	Any mitigation proposals should result from the applicant having detailed consultation with relevant representatives of the fishing industry, IFCAs, the MMO and the relevant Defra policy team in England and NRW and the relevant Welsh Government policy team in Wales. Mitigation should be designed to enhance, where reasonably possible, any potential medium and long-term positive benefits to the fishing industry, commercial fish stocks and the marine environment.	Extensive consultation with UK and non-UK stakeholders has been undertaken and presented in the Consultation Report (Document Reference E3). This is summarised in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6), with further information in Volume 4, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F4.6.1).
Marine historic environment	2.8.252 – 2.8.254	The avoidance of important heritage assets to ensure their protection in situ, is the most effective form of protection. This can be achieved through the implementation of exclusion zones around known and potential heritage assets which preclude development activities within their boundaries. These boundaries can be drawn around either discrete sites or more extensive areas identified in the Environmental Statement produced to support an application for consent.	Archaeological exclusion zones are presented as a measure adopted as part of the Morgan Generation Assets in Volume 2, Chapter 8: Marine archaeology of the Environmental Statement (Document Reference F2.8).
	2.8.255 – 2.8.258	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology. Where requested by the applicant, the Secretary of State should consider granting consents which allow for micrositing/microrouting (see paragraphs 2.8.89 above) within a specified tolerance. This allows changes to be made to the precise location of infrastructure during the construction phase so that account can be taken of unforeseen circumstances such as the discovery of marine archaeological remains.	Micrositing is presented as a measure adopted as part of the Morgan Generation Assets in Volume 2, Chapter 8: Marine archaeology of the Environmental Statement (Document Reference F2.8).
Offshore wind impacts: navigation and shipping	2.8.259 – 2.8.260	Mitigation measures will include site configuration, lighting and marking of projects to take account of any requirements of the General Lighthouse Authority.	A list of commitments and mitigation measures made by the Morgan Generation Assets and relevant to shipping and navigation are described within the NRA (Volume 4,

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		In some circumstances, the Secretary of State may wish to consider the potential to use requirements involving arbitration (between the applicant and third parties) as a means of resolving how adverse impacts on other commercial activities will be addressed.	Annex 7.1 of the Environmental Statement (Document reference F4.7.1)) and the Mitigation and Monitoring Schedule (Document Reference J6). Collectively these were assessed to reduce all navigation risks to become tolerable (Broadly Acceptable or ALARP). This includes a layout plan and a lighting and marking plan.
Other offshore infrastructure and activities	2.8.261 – 2.8.262	Detailed discussions between the applicant for the offshore wind farm and the relevant consultees should have progressed as far as reasonably possible prior to the submission of an application. As such, appropriate mitigation should be included in any application, and ideally agreed between relevant parties. In some circumstances, the Secretary of State may wish to consider the potential to use requirements involving arbitration as a means of resolving how adverse impacts on other commercial activities will be addressed.	A range of fishers and shipping and navigation operations within the vicinity of the projects have been consulted on potential impacts and mitigation strategies. Consultation and any measures adopted as part of the project will be presented in the final Consultation Report in (Document Reference E3) and the Technical Engagement Plan (Document Reference E4). The measures adopted as part of the Morgan Generation Assets reduce or negate impacts with the Mitigation and Monitoring Schedule (Document Reference J6) presenting the measures to be adopted.
Seascape and visual effects	2.8.263 – 2.8.264	Neither the design nor scale of individual wind turbines can be changed without significantly affecting the electricity generating output of the wind turbines. Therefore, the Secretary of State should expect it to be unlikely that mitigation in the form of reduction in scale will be feasible. However, the siting layout of the turbines should be designed appropriately to minimise harm, considering other constraints such as ecological effects, safety reasons or engineering and design parameters.	The principles used to determine the layout of the Morgan Generation Assets wind turbines are set out in the Project Description Document, Volume 1, Chapter 3 of the Environmental Statement (Document reference F1.3), and the Site Selection and Consideration of Alternatives Volume 1, Chapter 4 of the Environmental Statement (Document reference F1.4).
Compensatory measures			
General	2.8.267 – 2.8.272	If, during the pre-application stage, SNCBs indicate that the proposed development is likely to adversely impact a protected site, the applicant should include with their application such information as may reasonably be required	The conclusions of the ISAA (Document Reference E1.1. to E1.3) and MCZ Assessment (Document Reference E2) are such that no derogation case under the Habitats Regulations and 2009 Act are required to be submitted

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		to assess potential derogations under the Habitats Regulations or the Marine and Coastal Access Act 2009. Where such an indication is given later in the development consent process, the applicant should share this information as soon as reasonably practical. This information includes: • assessment of alternative solutions, showing the relevant tests on alternatives have been met; • a case showing that the relevant tests for IROPI or Measures of Equivalent Environmental Benefit have been met; and • appropriate securable environmental compensation Provision of such information will not be taken as an acceptance of adverse impacts and if applicants dispute the likelihood of adverse effects, they can provide this information as part of their application, 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination. It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	with the Application. Therefore, no compensatory measures are required.
	2.8.273 - 2.8.275	Applicants should work closely at an early stage in the pre-application process with SNCBs, and Defra, to develop a compensation plan for all protected sites adversely affected by the development. Before submitting an application, applicants should seek the views of the SNCB and Defra Secretary of State, as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not	Early engagement has been carried out through the Evidence Plan process as demonstrated in the Technical Engagement Plan (Document Reference E4). The conclusions of the ISAA (Document Reference E1.1 - E1.3) and MCZ Screening Assessment (Document Reference E2) are such that no derrogation case under the Habitats Regulations and 2009 Act are required to be

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority and Secretary of State.	submitted with the Application. Therefore no compensatory measures are required.
Strategic compensation	2.8.279 - 2.8.280	Applicants will be able to access tools and mechanisms to support identification of suitable compensation, and facilitate delivery of strategic compensation measures where appropriate. The government is still developing its policies on strategic compensation through the COWSC programme and guidance will be published in due course.	The Applicant has considered any policies or guidance on strategic compensation that were published in a reasonable timeframe ahead of the Morgan Generation Assets application for consent. as mentioned before, the conclusions of the ISAA (Document Reference E1.1 - E1.3) and MCZ Screening Assessment (Document Reference E2) are such that no derrogation case under the Habitats Regulations and 2009 Act are required to be submitted with the Application. Therefore no compensatory measures are required.
	2.8.283	Applicants may also want to coordinate with other marine industry sectors who also need to find compensatory measures. This will ensure compensatory measures are complementary and/or take advantage of opportunities to join together to deliver strategic compensation. Applicant's may also want to consult with those industries/stakeholders who are affected by any proposed compensation measures.	The conclusions of the ISAA (Document Reference E1.1 - E1.3) and MCZ Screening Assessment (Document Reference E2) are such that no derrogation case under the Habitats Regulations and 2009 Act are required to be submitted with the Application. Therefore no compensatory measures are required.
Other offshore infrastructure and activities	2.8.342 – 2.8.345, 2.8.348	Where a proposed offshore wind farm potentially affects other offshore infrastructure or activity, a pragmatic approach should be employed by the Secretary of State. Much of this infrastructure is important to other offshore industries as is its contribution to the UK economy. In such circumstances, the Secretary of State should expect the applicant to work with the impacted sector to minimise negative impacts and reduce risks to as low as reasonably practicable. As such, the Secretary of State should be satisfied that the site selection and site design of a proposed offshore wind	As described in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4) of the Environmental Statement, the Morgan Generation Assets have been sited to minimise potential impacts on other sea users where possible. Consultation with potentially affected stakeholders has been carried out from the early stages of the Morgan Generation Assets and has continued throughout the pre-application consultation process. Details of this are presented in Table 9.4 of Volume 2, Chapter 9 : Other Sea Users (Document Reference F2.9) of the Environmental

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		farm and offshore transmission has been made with a view to avoiding or minimising disruption or economic loss or any adverse effect on safety to other offshore industries. Applicants will be required to demonstrate that risks to safety will be reduced to as low as reasonably practicable. Providing proposed schemes have been carefully designed, and that the necessary consultation with relevant bodies and stakeholders has been undertaken at an early stage, mitigation measures may be possible to negate or reduce effects on other offshore infrastructure or operations to a level sufficient to enable the Secretary of State to grant consent.	Statement as well as within the Consultation Report (Document Reference E3) and the Technical Engagement Plan (Document Reference E4). As such the Morgan Generation Assets has complied with these paragraphs. Measures adopted as part of the Morgan Generation Assets to reduce or negate impacts are contained within the Mitigation and Monitoring Schedule (Document Reference J6).

A.1.2.4 EN-5 NPS Accordance

Table 1.30: NPS EN-5 Accordance.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Introduction	1.1.10	Applicants should ensure that their applications, and any accompanying supporting documents and information, are consistent with the instructions and guidance given to applicants in this NPS, EN-1 and any other NPSs that are relevant to the application in question.	Each topic-specific chapter considers how best to apply the policy and guidance presented in the NPSs.

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Factors influencing site selection and design	2.2.2, 2.2.4 – 2.2.6	Siting is determined by: the location of new generating stations or other infrastructure requiring connection to the network, and/or system capacity and resilience requirements determined by the Electricity System Operator A strategic and holistic approach to onshore and offshore network planning, will identify the most efficient way of meeting decarbonisation targets and should reduce the overall amount of network infrastructure required. Applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone. Moreover, the locational constraints identified above do not exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in Sections 2.4-2.9	The location and site selection process for the Morgan Generation Assets infrastructure is presented in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (Document Reference F1.4). As an offshore project only, Morgan Generation Assets does not contain any transmission or onshore elements which will form part of a separate DCO application with the approach to Morgan and Morecambe Windfarms being defined as part of the HDRN.
Sulphur Hexafluoride (SF6)	2.9.61 - 2.9.64	Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets. Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost. In particular, an accounting of the cost differential between the SF6-reliant asset and the appropriate SF6-free alternative should be provided. Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	The Morgan Generation Asset's approach to SF6 is presented in Volume 3, Annex 3.2: Sulphur Hexafluoride report of the Environmental Statement (Document Reference 3.3.2).

Mitigation

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
General	2.10.1	The applicant should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process.	Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (Document Reference F1.4) presents the consideration of alternatives relevant to the Morgan Generation Assets as an offshore only application including a CEA taking into account that the transmission assets will form part of a separate DCO.
Sulphur Hexafluoride	2.10.14 - 2.10.15	The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments. Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	The Morgan Generation Asset's approach to SF6 is presented in Volume 3, Annex 3.2: Sulphur Hexafluoride report of the Environmental Statement (Document Reference 3.3.2). the Applicant is seeking to use alternatives to SF6 where possible.
Special assessment principles for offshore-onshore transmission			

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Consenting process	2.12.8 - 2.12.11	As part of the transition to a more coordinated approach, it is anticipated that some proposals for transmission may be consented separately to those for the windfarm (array) application. For this to occur, an applicant will need to make a request to the Secretary of State. The Secretary of State would then decide whether to give a direction under Section 35 of the Planning Act 2008 (see paragraph 1.6.3 and EN-1, paragraphs 1.3.7 and 3.2.10). In some instances, applications comprising packages of co-ordinated offshore transmission infrastructure could be brought forward through the use of Section 35 powers. A Section 35 direction by the Secretary of State could also be given in respect of interconnector and 'bootstrap' projects where the NSIP consenting route is sought by the applicants of those projects.	In accordance with the UK Government published the 'Pathway to 2030 Holistic Network Design' in 2022 it was set out the approach to connecting 50 GW of offshore wind to the National Grid. A key output of the Holistic Network Design (HND) process was the conclusion that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. Although the projects are being developed by separate companies, which means it is not feasible for all aspects of both projects to be consented under a single application, the Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham. Of note however, this application solely relates to the offshore generation assets of Morgan Offshore Wind Project which is set within this coordinated approach. A successful S35 direction was sought from the Secretary of State for the Transmission Assets, which is subject to a separate DCO application.
Offshore-onshore transmission: Applicant assessment			

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
Consideration of strategic network design	2.13.1, 2.13.4	The strategic network designs such as those led or enabled by National Grid Electricity System Operator (ESO) will usually form the basis for identifying proposals for co-ordinated transmission. This includes the Holistic Network Design (HND) for onshore-offshore transmission prepared by ESO for projects under the Pathway to 2030 workstream. In the case of infrastructure identified through the HND, applicants should identify any variations to or developments from that work and justify these in accordance with the same objectives or criteria above, i.e. economic and efficient, deliverable and operable, minimise impact on the environment and minimise the impact on the local communities, giving these four criteria equal weight.	In accordance with the UK Government published the 'Pathway to 2030 Holistic Network Design' in 2022 it was set out the approach to connecting 50 GW of offshore wind to the National Grid. A key output of the Holistic Network Design (HND) process was the conclusion that the Morgan Generation Assets and the Morecambe Offshore Windfarm should work collaboratively in connecting their two wind farms to the National Grid electricity transmission network at Penwortham in Lancashire. Although the projects are being developed by separate companies, which means it is not feasible for all aspects of both projects to be consented under a single application, the Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham. Of note however, this application solely relates to the offshore generation assets of Morgan Offshore Wind Project which is set within this coordinated approach.
Coordinated approach, including for 'Early Opportunities' projects	2.13.5 - 2.13.8	Radial offshore transmission options to single windfarms should only be proposed where options assessment work identifies that a co-ordinated solution is not feasible. For OTNR Early Opportunities projects, co-ordinated design work should be brought forward by applicants. The identification of co-ordinated solution options, and any radial option, should consider the criteria for designs to be deliverable and operable, economic and efficient, minimise impact on the environment and minimise impact on the local communities. Options should seek to identify the most appropriate balance between these criteria. The coordinated solutions assessed should seek to be ambitious in the degree of co-ordination, wherever possible. This includes taking account of	This application has followed a OTRN Early opportunity process where the National Grid Electricity System Operator has conducted a HND to assess options to improve the coordination of offshore wind generation connections and transmission networks. The output of this process concluded that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively on a

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
		geographic and temporally proximate projects including opportunities to connect wind farms and multi-purpose interconnectors and/or bootstraps with each other. Evidence should demonstrate that this has been considered in the assessment of options. If, through the coordinated options assessment work, a radial route is deemed to be the only feasible solution, applicants should evidence each co-ordination option and the accompanying assessment. These assessments should detail the application of the criteria identified above versus the radial counterfactual. In these instances, the Secretary of State should have regard to the need case set out in Section 3.3 of EN-1.	coordinated grid connection at Penwortham in Lancashire. A coordinated grid connection for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm will be delivered as part of a separate transmission assets application for consent, with this application focussing on the generating elements of the coordinated approach.
Impacts	2.13.12 - 2.13.14	Applicants are expected to be able to indicate how co-ordination including reduction in impacts have been considered drawing on work of others, including that led or enabled under the OTNR such as by National Grid Electricity System Operator (ESO). For those projects not covered by the strategic network planning undertaken by the ESO, applicants should seek to demonstrate the reduced overall impacts from co-ordination and how the onshore connection locations have been identified. Early Opportunities projects are expected to demonstrate the reductions in environmental and community impact achieved through co-ordination compared with radial solutions. Applicants should refer to policy text in EN-3 regarding consideration of impacts in the marine environment and policy text in the remainder of this policy statement regarding consideration of impacts onshore.	This application has followed a OTRN Early opportunity process where the National Grid Electricity System Operator has conducted a HND to assess options to improve the coordination of offshore wind generation connections and transmission networks. The output of this process concluded that the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm should work collaboratively on a coordinated grid connection at Penwortham in Lancashire. A coordinated grid connection for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm will be delivered as part of a separate transmission assets application for consent, with this application focussing on the generating elements of the coordinated approach.
Offshore-onshore transmission: mitigation			

Section / Topic	Paragraph Reference	NPS Requirement	Accordance with the NPS
General	2.14.2	In the assessments of their designs, applicants should demonstrate: • how environmental, community and other impacts have been considered and how adverse impacts have followed the mitigation hierarchy i.e. avoidance, reduction and mitigation of adverse impacts through good design; and • how enhancements to the environment post construction will be achieved including demonstrating consideration of how proposals can contribute towards biodiversity net gain (as set out in Section 4.5 of EN-1 and the Environment Act 2021), as well as wider environmental improvements in line with the Environmental Improvement Plan and environmental targets (paragraph 4.2.29 of EN-1).In addition, all applicants are encouraged to demonstrate how the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline.	The application is accompanied by an Environmental Statement (Volumes 1 – 4) which identifies the baseline, the proposal and impacts as well as the cumulative impacts of the development in the three dimensions of sustainable development: environment, society and the economy. Each topic chapter demonstrate how impacts have been considered in the mitigation hierarchy and a Monitoring and Mitigation Schedule (Document Reference J6) is provided to evidence which enhancement will be achieved. A Biodiversity Benefit Statement is also provided as part of this application (Document Reference J6) .