

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Outline fisheries liaison and co-existence plan

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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

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Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Company Fisheries Liaison Officer	Primary contact for the Fishing Industry Representative and Offshore Fisheries Liaison Officer. Main point of contact for the Applicant for any commercial fisheries related queries.
Development Consent Order	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project.
Fisheries Industry Representative	Primary contact point within the fishing community, provider of feedback to the Company Fisheries Liaison Officer and Offshore Fisheries Liaison Officer and disseminator of project information.
Fishing ground	An area of water or seabed targeted by fishing activity.
Gear type	The method/equipment used for fishing.
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.
Landings	Quantitative description of the amount of fish returned to port for sale, in terms of value or weight.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for 'deemed marine licence' as part of the DCO process.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, and offshore substation platforms forming part of the Morgan Generation Assets will be located.
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.
Offshore Fisheries Liaison Officer	Liaison between fishing vessels and clients, using local knowledge and fisheries experience to ensure offshore operations run smoothly and encourage co-operation. Provider of feedback to the Company Fisheries Liaison Officer and Fishing Industry Representative.
Outline Fisheries Liaison and Co-existence Plan	A plan outlining the approach to fisheries liaison during the construction, operations and decommissioning phases and setting out the strategy to facilitate co-existence between the project and commercial fishing interests.
Regional Fisheries Contact(s)	The Fisheries Industry Representative who is the primary contact point within the fishing community, provider of feedback to the Company Fisheries Liaison Officer and Offshore Fisheries Liaison Officer and disseminator of project information.
Safety zone	This includes defined safety zones (in accordance with the Maritime and Coastguard Agency) and advisory safety zones (recommended during construction and/or maintenance works).
Static gear	Gear that is set to catch fish or shellfish. This is a collective term and includes gear that remains static and is not towed, such as pots, traps and set nets.

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Term	Meaning
Scallop Mitigation Zone	The Morgan Array Area will include a surface infrastructure free area to promote co-location and co-existence between the operational offshore wind farm and ongoing fishing activities within the array area.
Wind turbines	The wind turbines including the tower, nacelle and rotor.

Acronyms

Acronym	Description
ANMP	Aids to Navigation Management Plan
AToN	Aid to Navigation
CBRA	Cable Burial Risk Assessment
CFLO	Company Fisheries Liaison Officer
CMS	Construction Method Statement
COLREGS	International Regulations for Preventing Collisions at Sea
CSIP	Cable Specification and Installation Plan
DCO	Development Consent Order
DP	Design plan
DPR	Daily Progress Report
EnBW	Energie Baden-Württemberg AG
FIR	Fishing Industry Representative
FLCP	Fisheries Liaison and Co-existence Plan
FLOWW	Fishing Liaison with Offshore Wind and Wet Renewables Group
KIS-ORCA	The Kingfisher Information Service – Offshore Renewable and Cable Awareness
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
MCA	Maritime Coastguard Agency
MMO	Marine Management Organisation (UK)
MPCP	Marine Pollution Contingency Plan
NSIP	Nationally Significant Infrastructure Project
NtM	Notice to Mariners
OEMP	Offshore Environmental Management Plan
OFLO	Offshore Fisheries Liaison Officer
ORE	Offshore Renewable Energy
OSP	Offshore Substation Platform
OTNR	Offshore Transmission Network Review
SAR	Search and Rescue

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Acronym	Description
SMZ	Scallop Mitigation Zone
SOLAS	Safety of Life at Sea
SOP	Standard Operation Procedure
UKHO	United Kingdom Hydrographic Office
VMS	Vessel Monitoring System

Units

Unit	Description
km	Kilometre
m	Metre
nm	Nautical mile (distance; 1 nm = 1.852 km)

1 Outline Fisheries Liaison and Co-existence Plan

1.1 Introduction

1.1.1.1 This document serves as the Outline Fisheries Liaison and Co-existence Plan (hereafter referred to as the Outline FLCP) for the Morgan Offshore Wind Project: Generation Assets, hereafter referred to as the Morgan Generation Assets.

1.1.1 Project background

1.1.1.2 The Morgan Generation Assets is a proposed offshore wind farm being developed by Morgan Offshore Wind Limited, a joint venture of bp and Energie Baden-Württemberg AG (EnBW), hereafter referred to as the Applicant. The Applicant entered into an agreement for lease for the Morgan Generation Assets in early 2023. The Morgan Generation Assets are a Nationally Significant Infrastructure Project (NSIP) requiring a Development Consent Order (DCO) under the Planning Act 2008.

1.1.1.3 The Morgan Generation Assets are located in the east Irish Sea, 20.1 nautical miles (nm) from the northwest coast of England and 12 nm from the Isle of Man (Figure 1.1), in ICES Statistical Area VIIa and wholly within English waters. The offshore infrastructure will comprise of up to 96 wind turbines, up to four offshore substation platforms (OSPs), 60 km of interconnector cables and 390 km of inter-array cables.

1.1.1.4 Offshore construction is currently planned to commence in 2026 for a duration of up to four years. A high-level indicative construction programme for the Morgan Generation Assets is presented within Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.1.1.5 The Morgan Offshore Wind Project has been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR). The output of this process concluded that the Morgan Offshore Wind Project will share a grid connection location at Penwortham in Lancashire with the Round 4 Morecambe Offshore Windfarm, also located in the east Irish Sea. A separate DCO application will be submitted for the construction, operations/maintenance and decommissioning of the transmission assets required to enable the export of electricity from both the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm to the National Grid entry point at Penwortham.

1.1.1.6 A marine licence is required before carrying out any licensable marine activity under the Marine and Coastal Access Act 2009. Marine licences can be issued for licensable activities in English offshore waters by the Marine Management Organisation (MMO), the marine regulator for all licensable activities related to the offshore wind farm generation infrastructure (wind turbines, OSPs, inter-array cables and interconnector cables) located within the Morgan Array Area. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for 'deemed marine licence' as part of the DCO process. All licensable activities related to the offshore wind farm generation infrastructure located within the Morgan Array Area will be applied for under a deemed marine licence.

1.1.2 Purpose and application

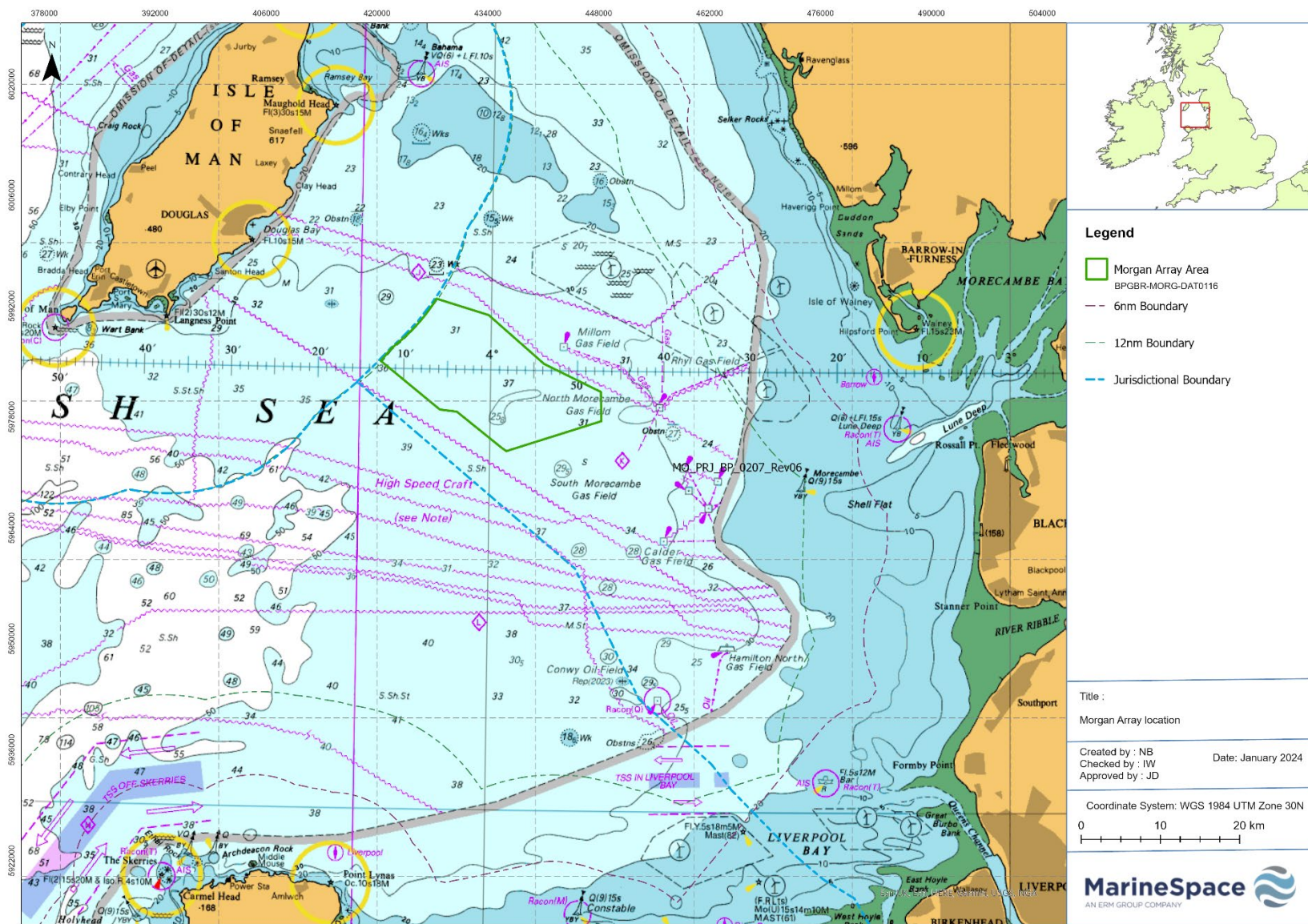
1.1.1.7 This Outline FLCP sets out the Applicant's strategy to facilitate and promote co-existence and co-location between the Morgan Generation Assets and commercial fishing interests, and the approach to fisheries liaison during the construction, operational/maintenance and decommissioning phases of the Morgan Generation

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Assets. The aim of this outline document is to provide an overview of information that will be included within the final FLCP. This includes information on fisheries liaison, engagement, safety issues and mitigation measures.

- 1.1.1.8 This Outline FLCP includes a summary of the key measures proposed to facilitate co-existence and co-location with commercial fishing and to minimise potential impacts during the construction, operational/maintenance and decommissioning phases of the Morgan Generation Assets. This Outline FLCP is also informed by Volume 4, Annex 6.1: Commercial fisheries technical report of the Environmental Statement (Document Reference F4.6.1).
- 1.1.1.9 This Outline FCLP has been developed with respect to feedback provided via project-specific consultation, aiding in the development of appropriate fisheries management and mitigation measures and reduction of potential impacts. More information on key issues specific to commercial fisheries raised during consultation activities and how these issues have been considered in the production of the Environmental Statement is provided in Volume 2, Chapter 6 Commercial fisheries of the Environmental Statement (Document Reference F2.6).
- 1.1.1.10 This Outline FLCP is a 'live' document and as such it will be further developed post-consent in consultation with stakeholders.

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Figure 1.1: The Morgan Generation Assets location.

1.1.3 Guidance and legislation

1.1.1.11 This Outline FLCP has been developed with reference to the following key legislation and guidance documentation:

- Fisheries Act 2020 – Joint Fisheries Statement: Displacement Policy (UK Government, 2020)
- Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Offshore Renewables Developments. Recommendations for Fisheries Liaison (FLOWW, 2014)¹
- FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Disruption Settlements and Community Funds (FLOWW, 2015)
- Marine Scotland Guidance on preparing a Fisheries Management and Mitigation Strategy – Draft (Marine Scotland, 2020)
- Seafood/Offshore Renewable Energy (ORE) Engagement in Ireland - A Summary Guide (Department of Housing, Local Government and Heritage, 2023)
- International maritime regulations as adopted by the relevant flag state such as International Regulations for Preventing Collisions at Sea (COLREGS) (IMO, 1972/77) and Safety of Life at Sea Convention (SOLAS) (IMO, 1974).

1.1.1.12 Project-specific consultation has been undertaken with the MMO, National Federation of Fishermen's Organisation and other relevant statutory and non-statutory bodies. More information on key topics specific to commercial fisheries raised during consultation activities and how these topics have been considered in the production of the outline FLCP is provided in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6).

1.1.4 Structure of this Outline Plan

1.1.1.13 This outline FLCP is structured as follows:

- Section 1.2 - Fisheries liaison :This section presents detail on the guidance and information used to develop the fisheries liaison strategies, with descriptions of the roles and responsibilities of those involved in implementing the strategies and details on how information will be exchanged with key commercial fisheries stakeholders
- Section 1.3 Mitigation and co-existence: This section provides an overview of co-existence and co-location strategy and procedures that will be implemented during the construction, operations and maintenance, and decommissioning phases of the Morgan Generation Assets.

¹ It is anticipated that updated FLOWW Best Practice Guidance for Offshore Renewables Developments, Recommendations for Fisheries Liaison is to be released in 2024.

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1.2 Fisheries liaison

1.2.1 Roles and responsibilities

1.1.1.14 The implementation of an appropriate communication and information distribution strategy is of key importance in minimising interference with the fishing industry and promoting co-existence and co-location between the Morgan Generation Assets and commercial fishing interests. Figure 1.2 outlines the lines of communication for the Morgan Generation Assets that will be included in the final FLCP.

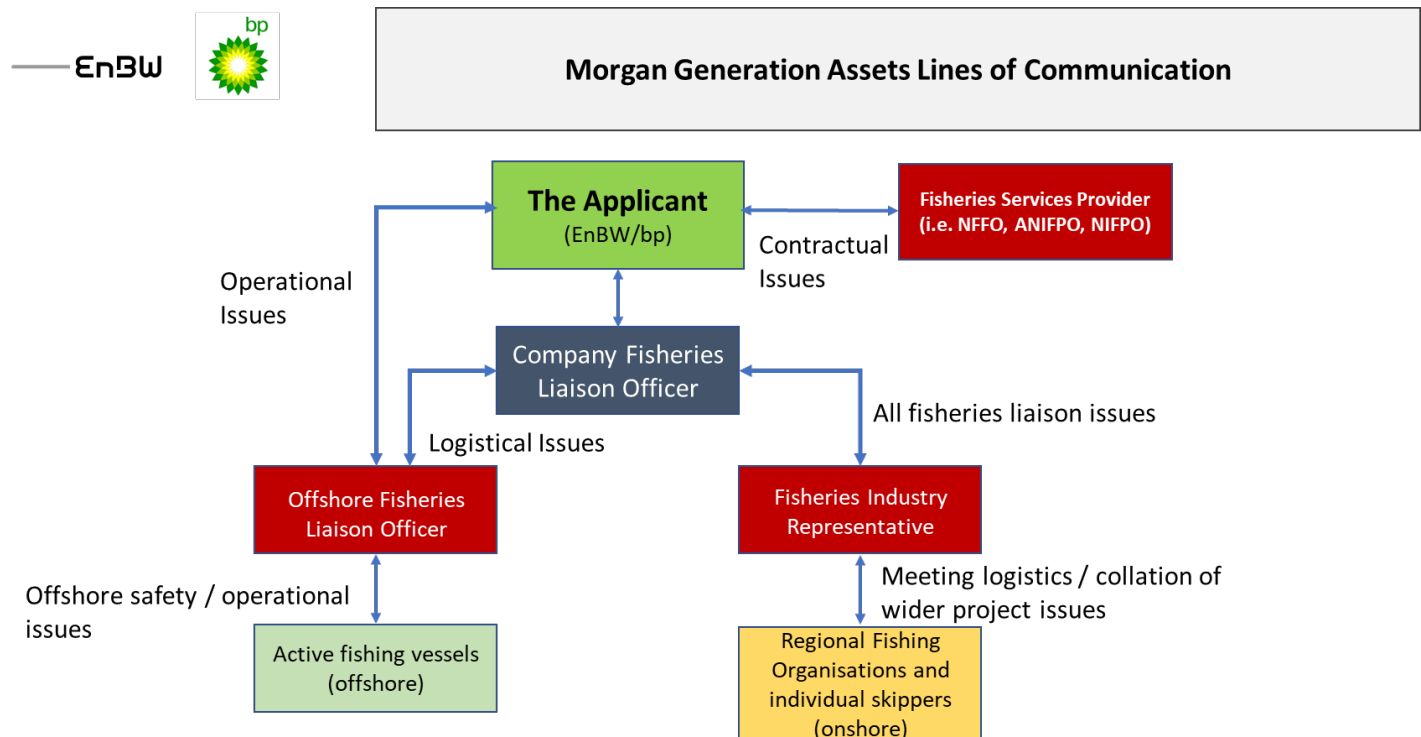


Figure 1.2: Morgan Generation Assets lines of communication.

1.1.1.15 The following sections outline key roles and responsibilities regarding liaison with the fishing industry.

The Applicant

1.1.1.16 The primary responsibilities of the Applicant are:

- To pro-actively engage with commercial fisheries stakeholders and statutory and non-statutory bodies and organisations that have the potential to be affected by the Morgan Generation Assets
- To formulate, agree and implement efficient communication channels for distributing the Morgan Generation Assets related information to stakeholders
- Facilitate and promote co-existence and co-location between the Morgan Generation Assets and commercial fishing interests and give consideration to the concerns of commercial fisheries stakeholders in the formulation of mitigation strategies

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- To appoint and employ a Company Fisheries Liaison Officer (CFLO) as the main point of contact for the Applicant to engage with the contracted Fishing Industry Representative (FIR), as required throughout construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets
- To maintain (via the CFLO) regular contact with fishing vessels observed to be within the vicinity of the work areas of survey and construction vessels
- To provide sufficient notice to enable the relocation of any static fishing gears present within any areas of proposed surveys and/or construction/maintenance works (section 1.3.3)
- To promote productive co-existence through the early provision of information relating to planned survey and construction activities to fisheries stakeholders, including information on the type and location of cable protection measures and where this may be required
- To utilise Offshore Fisheries Liaison Officers (OFLOs) and guard vessels, where appropriate, during the construction, operation and maintenance and decommissioning phases.

Company Fisheries Liaison Officer (CFLO)

- 1.1.1.17 The CFLO is appointed by the Applicant. The principal role of the CFLO is to establish and maintain effective communications between the Applicant, the FIR, any contractors or sub-contractors, fisheries stakeholders and other users of the sea during the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets. The CFLO is also responsible for monitoring compliance with good practice guidelines.
- 1.1.1.18 The Final FLCP will set out the primary responsibilities of the CFLO, which will include:
- To establish and maintain a strong positive working relationship with the fishing industry
 - Provision of advice to the Applicant on fisheries liaison throughout the pre-construction, construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets
 - Organisation of, preparation for and attendance at fisheries meetings, local fisheries stakeholder events and meetings with regulators, as required
 - Act as a key point of contact for the FIR and fisheries stakeholders, and be available to receive and respond to telephone and e-mailed enquires and statements from fisheries stakeholders' representatives and individual fisheries stakeholders, as well as the Applicant's enquiries
 - To maintain a fisheries stakeholder database including the distribution of information and updates through Notice to Mariners (NtMs) and the Kingfisher Information Service of Seafish, to ensure all fisheries stakeholders are adequately informed of relevant Morgan Generation Assets activities
 - Work with the Applicant and fisheries stakeholders to resolve any fisheries related issues as they arise
 - Gather information with regards to fishing activities within the Morgan Generation Assets site and in its vicinity

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- On behalf of the Applicant, facilitate the relocation of static fishing gear where this may be required, i.e. prior to survey works and/or construction/maintenance works.

Fisheries Industry Representative (FIR)

1.1.1.19 The FIR is appointed by the CFLO. Often the first point of contact for fisheries stakeholders, the FIR will support the CFLO in their duties described in paragraph 1.1.1.17. The FIR will ensure skippers of fishing vessels are aware of any forthcoming Morgan Generation Assets operations and other on-going project activities.

- 1.1.1.20 The Final FLCP will set out the primary responsibilities of the FIR, which will include:
- To be a primary contact point within the fishing community, to determine fishing industry views and objectively provide the Morgan Generation Assets with this information
 - To ensure the dissemination of information from the Morgan Generation Assets to relevant associations, individual fisheries stakeholders and other interested parties, subsequently allowing efficient feedback to the CFLO and the Applicant
 - To assist in the distribution of information and updates of Morgan Generation Assets activities through NtMs and the Kingfisher Information Service of Seafish
 - To attend any fisheries meetings as required including preparation and distribution of meeting minutes, and the delivery of relevant actions
 - On invitation, attend public stakeholder engagement events
 - To contribute to maintaining and updating a fisheries register, to cover all interested fishing parties
 - To contribute to the population and/or verification of the commercial fisheries database
 - To objectively and impartially assist with the collection of information from fisheries stakeholders, regarding their activity in relation to the Morgan Generation Assets site
 - To keep a record of all communications with commercial fisheries stakeholders and the Applicant
 - To liaise with the CFLO to assist the Morgan Generation Assets in identifying areas of concern and/or potential conflict at a sufficiently early stage to enable, as far as practicable, appropriate measures to be implemented to address these
 - To objectively, impartially and confidentially assist with damage to gear claims within their agreed remit.

Offshore Fisheries Liaison Officer (OFLO)

1.1.1.21 The OFLO is appointed by the CFLO. OFLOs will be utilised, where appropriate, during the pre-construction, construction, operations and maintenance and decommissioning phases of the Morgan Generation Assets. OFLOs will facilitate engagement with offshore fisheries stakeholders during specific project works, to limit potential for negative interaction between the Morgan Generation Assets and commercial fishing interests.

1.1.1.22 The Final FLCP will set out the primary responsibilities of the OFLO, which will include:

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- To maintain regular contact with the CFLO and the Applicant and/or their contractors, where appropriate, concerning fishing vessel activity at the Morgan Generation Assets site or in the vicinity
- To record marine traffic and fishing vessel activity during marine operations and maintain regular contact with any guard vessels and support vessels on site
- To communicate with the vessel master in respect of providing any relevant information to fishing vessels, and, when the vessel is not engaged in marine operations, work with the vessel master to avoid, where reasonably practicable, fishing vessels actively engaged in fishing operations
- To liaise with any fisheries stakeholders who may have static gear deployed in areas relevant to the Morgan Generation Assets and vessel transit routes
- To provide the required support to the CFLO in the handling of any claims by fisheries stakeholders who may have static gear deployed in areas relevant to the Morgan Generation Assets and vessel transit routes
- To provide Daily Progress Reports (DPRs) via email to the CFLO and the Applicant.

1.2.2 Communications and information distribution

1.1.1.23 To date, the Applicant has managed fisheries co-existence via open and transparent communications, timely notices for surveys and consultation meetings with commercial fisheries stakeholders.

1.1.1.24 The Morgan Generation Assets will disseminate information to the fishing community via the CFLO and appointed FIR. Notices and information for fisheries stakeholders such as those below, will be distributed to all relevant fisheries interests via NtMs and through the Kingfisher Information Service of Seafish notifications as a minimum. Specific notification periods outlined in Table 1.1 are committed to within the draft DCO (Document Reference C1) within the deemed marine licences . Notices and information for fisheries stakeholders may include but not be limited to:

- Survey and construction schedules
- Notification of any major maintenance activity (such as wind turbine blade replacement)
- Notices and activity specific information
- Weekly notice of operations throughout the construction phase, which highlight the vessels that will be on site during the following week, the location of operations and the status of installed infrastructure (i.e. cables which have been laid but not buried)
- Notification of changes to the status of infrastructure including cable exposure during the operations and maintenance phase, to ensure fisheries stakeholders are aware of the increased risk in specific areas. Guard vessels may be used where appropriate until the risk has been mitigated by burial and/or other protection methods, ensuring navigational safety and minimising the potential risk of gear snagging.

1.1.1.25 An outline for the distribution of information to commercial fisheries stakeholders during the construction, operational/maintenance and decommissioning phases of the Morgan Generation Assets are given in Table 1.1.

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Table 1.1: Timescales for distribution of Morgan Generation Assets information to commercial fisheries stakeholders.

Information/activity to be distributed	Timescale/method for distribution
Site surveys and unexploded ordnance clearance (where required)	Notices and information distribution at least 7 days prior to survey mobilisation. Information on site surveys and unexploded ordnance clearance is to be included in a formal Notice to Mariners.
Construction and operations/maintenance activities	<p>Notices and information distribution at least 7 days prior to commencement of offshore construction activities. The applicant must ensure that NtMs are updated and reissued at weekly intervals during construction activities and at least five days before any planned operations and maintenance works.</p> <p>Information on the construction and operations/maintenance activities is to be included in a formal Notice to Mariners.</p>
Morgan Generation Assets updates	<p>Project updates will be circulated via e-mail or hard copy to fisheries stakeholders, when appropriate, or as needed by the project, or when reasonably requested by stakeholders. These may be issued directly via email and/or posted onto the Morgan Generation Assets website.</p> <p>Project updates may also be delivered through a commercial fisheries working group or groups (offshore and inshore fisheries), subject to engagement for the Final FLCP on the creation of such a group.</p>
Unscheduled liaison	Additional unscheduled liaison and consultation would be undertaken by either the CFLO, the Applicant or the FIR (if applicable), when required, to address any issues and fisheries stakeholder concerns as they arise.

1.3 Mitigation and co-existence

1.1.1.26 The Applicant regards co-existence and co-location as the joint presence of both industries working together in close proximity and within the Morgan Array Area respectively and believes that co-existence and co-location between Morgan Generation Assets and commercial fisheries stakeholders can be achieved through the design of the project and ongoing transparent communications. An approach of avoiding and reducing impacts to both industries is the most sustainable approach to co-existence, as recommended in the FLOWW guidelines. A successful co-existence strategy will require open and transparent communication between the Morgan Generation Assets operators and the fishing industry. Therefore, the support and engagement of both parties are required. The Morgan Generation Assets has ensured collaborative communication throughout consultation periods and throughout all site investigation surveys.

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1.3.1 Measures adopted for the Morgan Generation Assets relevant to commercial fisheries

1.1.1.27 Measures relevant to commercial fisheries are set out within Table 1.2 below, which are designed to minimise disruption to the commercial fishing industry and promote both co-existence and co-location in and around the Morgan Generation Assets.

1.1.1.28 This Outline FLCP secures the measures set out within Table 1.2. As discussed within section 1.1.2, this Outline FLCP is to demonstrate the principles of the final FLCP, which is to be submitted for approval as required by a condition within the deemed marine licences in the draft DCO (Document Reference C1).

Table 1.2: Measures adopted for the Morgan Generation Assets relevant to commercial fisheries.

Measures	Justification	How the measure will be secured
Primary measures: Measures included as part of the project design		
<p>Development of and adherence to a Cable Method Statement (CMS) which includes a Cable Specification and Installation Plan (CSIP), the CSIP will incorporate the Cable Burial Risk Assessment (CBRA) where cable protection shall be designed to minimise snagging hazards as far as possible. for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement, type of rock (e.g. smoother edges).</p>	<p>To ensure safety of fishing activity and to minimise the amount of fishing grounds lost, cable protection shall be designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement, type of rock (e.g. smoother edges).</p> <p>The use of cable protection will be minimised as far as practicable and only used where required. Cable protection will only be used where the minimum target burial depth (0.5 m) cannot be achieved, for example in areas of hard ground. This will be informed by outputs from the Cable Burial Risk Assessment (CBRA) completed by the installation contractor(s) prior to the commencement of installation.</p>	<p>CSIP as part of the CMS secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to an offshore CMS which includes a CSIP where the time delay between sequential cable installation operations (e.g. cable-lay and post-lay burial), shall be minimised to as short as reasonably practicable.</p>	<p>Time delay between sequential cable installation operations (e.g. cable-lay and post-lay burial), shall be minimised to as short as reasonably practicable, to minimise duration of disruption to commercial fishing activity in the inter-array cables and interconnector cables area.</p> <p>The Morgan Generation Assets are to issue weekly notice of operations which depict where cables have been laid and when they have been buried.</p>	<p>CSIP as part of the CMS secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>

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Measures	Justification	How the measure will be secured
<p>Infrastructure spacings at a minimum of 1,400 m apart.</p>	<p>The Applicant has increased the minimum spacing between infrastructure within the Morgan Array Area, increasing the spacing from 1,000 m between rows of wind turbines and 875 m between each wind turbine in a row to 1,400 m both within and between rows, in order to provide additional space for continued fishing and transit by commercial fisheries between and around the Morgan Array Area.</p>	<p>Secured as a design parameter in requirement 2 of the Draft DCO (Document Reference C1) and as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a Design Plan (DP) with roughly north to south alignment of wind turbine rows and will include two lines of orientation for navigation and Search and Rescue (SAR) access.</p>	<p>A Design Plan, including a plan of the Morgan Array Area, will be prepared and submitted to the Maritime Coastguard Agency (MCA) and Trinity House post-consent but before construction commences.</p> <p>The Applicant has committed to positioning wind turbine rows in a roughly north to south alignment, to allow for continued fishing within the Morgan Array Area.</p> <p>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.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>The FLCP and DP are secured as a condition of the deemed marine licenses within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a Design Plan which includes implementation of a Scallop Mitigation Zone (SMZ) over an area of core scallop grounds within the Morgan Array Area.</p>	<p>To seek to design the array layout to increase potential for co-existence and co-location, 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.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>The FLCP and DP are secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Tertiary measures: Measures required to meet legislative requirements or actions that are considered to be standard practice</p>		
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for investigating the establishment of a commercial fisheries working group.</p>	<p>A commercial fisheries working group can provide a forum for information sharing and discussion of key issues with commercial fisheries stakeholders and other developers in the region.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>The FLCP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>

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Measures	Justification	How the measure will be secured
<p>Development of and adherence to an Offshore Environmental Management Plan (OEMP), which includes a FLCP, to include details of the appointment and responsibilities of a Company Fisheries Liaison Officer (CFLO).</p>	<p>To maintain effective communications between the Morgan Generation Assets and the commercial fishing industry.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for ongoing liaison with the fishing industry through the CFLO and FIR and adhere to good practice guidance with regards to fisheries liaison.</p>	<p>To maintain effective communications between the Morgan Generation Assets and the commercial fishing industry.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>The FLCP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for the use of Offshore Fisheries Liaison Officers (OFLOs) where required and appropriate.</p>	<p>OFLOs facilitate engagement with commercial fisheries stakeholders during specific Morgan Generation Assets works and promote co-existence by communicating the commitments and measures by the Morgan Generation Assets to coexist with the fishing industry and reduce impacts on commercial fisheries as far as practicably possible.</p> <p>Provision of detailed project information to fishermen to aid co-existence, such as site location for upload into fish plotters.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>FLCP as part of an OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Notification of construction, maintenance and decommissioning activities will be issued via Notices to Mariners (NtMs), giving appropriate advance warning to fishing fleets.</p>	<p>To ensure that the fishing industry is fully informed in advance of any offshore activities, information is to be circulated via (NtM) and Kingfisher Information Service of Seafish within time frames set out under the relevant condition of the deemed marine licences.</p>	<p>Notifications are secured as a condition in the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Timely and efficient distribution of NtMs.</p>	<p>To ensure that the fishing industry is fully informed in advance of any offshore activities, at regular intervals. Timescales for information distribution are outline in Table 1.1.</p>	<p>Secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1) and through this Outline FLCP.</p>

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Measures	Justification	How the measure will be secured
<p>Use of advisory clearance distances and safety zones during construction and periods of major maintenance.</p>	<p>To ensure navigational safety and minimise risk, 500 m safety zones will be implemented around wind turbines and OSPs during their construction.</p> <p>50 m safety zones will also be implemented around each item of infrastructure during the construction phase, where no construction works are taking place on that infrastructure (for example, where a wind turbine generator is incomplete or is in the process of being tested before commissioning).</p> <p>During the operations/maintenance phase, 500 m safety zones will also be implemented around any vessel involved in major maintenance works.</p> <p>Application and use of safety zones in accordance with the Safety Zone Statement (Document Reference J5).</p>	<p>The commitment to the use of advisory clearance distances and safety zones as set out in the Safety Zone Statement (Document Reference J5) is secured through this Outline FLCP.</p> <p>An application for safety zones will be made under the Energy Act 2004.</p>
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for the use of rolling advisory exclusion zones.</p>	<p>To ensure navigational safety, minimise risk of gear snagging and to avoid the entire Morgan Array Area being closed to fishing vessels during the construction phase, rolling advisory exclusion zones of 500 m will also be present around vessels installing inter-array cables and interconnector cables. As per the 'use of advisory clearance distances and safety zones during construction and periods of major maintenance' section of this table.</p>	<p>The commitment is secured through this Outline FLCP.</p> <p>FLCP as part of an OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to an Aids to Navigation Management Plan (ANMP) to ensure adequate navigational markers (including lighting), in accordance with the most recent relevant industry guidance and agreed prior to commencement of offshore construction.</p>	<p>To ensure navigational safety and minimise risk of gear snagging, suitable Aid to Navigation (AtoN) lighting and marking of the Morgan Array Area shall be undertaken complying with International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) Recommendations G1162 (IALA, 2021), to be finalised and approved in consultation with MCA and Trinity House through the preparation of an AtoN Management Plan.</p> <p>Fog horns to alert vessels to the position of structures when visibility is poor.</p> <p>Wind turbine informal naming/associated markings shall not interfere with formal AtoN's.</p> <p>AIS transponders to be placed on periphery corner wind turbines.</p>	<p>ANMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>

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Measures	Justification	How the measure will be secured
<p>Development of and adherence to a CMS, including CSIP that details cable protection management and scour protection management, to outline cable burial depth, cable protection and monitoring of inter array and interconnector cables to reduce snagging risk</p>	<p>To ensure navigational safety and minimise risk of gear snagging a cable specification and installation plan will be prepared (in line with consent conditions) prior to installation of the Morgan Generation Assets. This will include a detailed cable laying plan, including geotechnical data, cable laying techniques, cable protection, monitoring of cables. This will be informed by a CBRA, which will include details on minimum target burial depths. Information distribution will be aimed to be provided no less than three days for notification of buried cables becoming exposed on or above the seabed to the regional fisheries contact(s) and 24 hours for notification of damage to the Morgan Generation Assets.</p>	<p>CSIP as part of the CMS is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP that includes for annual reviews for the first five years of the operations and maintenance phase, to review Vessel Monitoring System (VMS) data and landings data to identify whether there are any changes to fishing activity within and around the Morgan Array Area and where there is change to discuss with commercial fisheries stakeholders.</p>	<p>Gathering data on fishing activity within and around the Morgan Array Area during the operations and maintenance phase of the Morgan Generation Assets in order to contribute to the evidence base for commercial fishing activity and offshore wind.</p>	<p>The commitment is secured through this Outline FLCP. FLCP as part of an OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Compliance with dropped objects procedures. All dropped objects must be reported to the MMO using the Dropped Object Procedure Form.</p>	<p>Compliance with dropped objects procedures which covers reporting and where necessary recovery of dropped objects to ensure navigational safety and minimise risk of gear becoming lost or damaged due to snagging.</p>	<p>Secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a Decommissioning Programme.</p>	<p>To ensure navigational safety and minimise risk of gear snagging and to satisfy the requirements of the Energy Act 2004.</p>	<p>Decommissioning Programme secured through a requirement of the draft DCO (Document Reference C1).</p>
<p>Development and adherence to an OEMP, which includes a Marine Pollution Contingency Plan (MPCP).</p>	<p>Development of an OEMP that details minimum environmental management requirements expected of the Applicant and all contractors and subcontractors, to ensure accidental pollution into the marine environment is minimised, through the development and adherence of a Marine Pollution Contingency Plan, for approval prior to commencement of construction. Measures will be adopted to ensure that the potential for release of pollutants from construction, and operations and maintenance, and decommissioning activities is minimised, which will include accidental spills planning, response and notification requirements.</p>	<p>MPCP as part of the OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>

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Measures	Justification	How the measure will be secured
<p>'As-laid' co-ordinates of cables within the Morgan Array Area (i.e. inter array cables)) shall be recorded and submitted to the UK Hydrographic Office (UKHO) and the Kingfisher Information Service – Offshore Renewable and Cable Awareness (KIS-ORCA Service). 'As-laid' cables shall be marked on Admiralty Charts and fisherman's awareness charts (paper and electronic format).</p>	<p>To ensure navigational safety and minimise risk of gear snagging, 'as-laid' co-ordinates of the cable route shall be recorded and submitted to the UKHO and KIS-ORCA Service. 'As-laid' cables shall be marked on Admiralty Charts and fisherman's awareness charts (paper, electronic and plotter format).</p>	<p>The commitment is secured through this Outline FLCP. FLCP as part of an OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>
<p>Development of and adherence to a FLCP, in accordance with the Outline FLCP which includes for the use of guard vessels where required.</p>	<p>Where cable exposures exist during the operational and maintenance phase, which would result in significant risk, guard vessels will be used where appropriate until the risk has been mitigated by burial and/or other protection methods, ensuring navigational safety and minimising the potential risk of gear snagging.</p> <p>Guard vessels facilitate engagement with commercial fisheries stakeholders during specific project works, maximising awareness of temporary hazards and reducing potential for interactions between the commercial fishing activity and the Morgan Generation Assets.</p> <p>All efforts will be made to ensure that consideration is given to the use of regional fishing industry vessels for any guard duties.</p>	<p>The commitment is secured through this Outline FLCP. FLCP as part of an OEMP is secured as a condition of the deemed marine licences within the Draft DCO (Document Reference C1).</p>

1.3.2 Co-existence procedures

1.1.1.29 This section provides an overview of co-existence procedures that will be included in the final FLCP and implemented during the construction, operations/maintenance and decommissioning phases of the Morgan Generation Assets.

Code of good practice for all vessels

1.1.1.30 Offshore installation and/or maintenance contractors appointed by the Applicant will be required to follow a code of good practice to ensure external communication between themselves and other marine users (including commercial fishers) is timely, accurate and clear. The code of good practice for all vessels will include, but not be limited to the following:

- Ensuring that any project related debris non-intentionally dropped during construction, operation and maintenance activities is removed as far as possible, where practical and safe to do so, and reported appropriately
- Ensuring that all vessels under contract for the Morgan Generation Assets adhere to the SOLAS and COLREGs requirements
- Ensuring that all vessels under contract with the Morgan Generation Assets will maintain proactive and professional communications with fishing vessels during offshore operations

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- Ensuring that all vessels contracted to undertake work for the Morgan Generation Assets will have undertaken appropriate risk assessments with regard to potential interactions with commercial fishing vessels
- Ensuring that all vessels contracted by the Applicant will follow a Standard Operation Procedure (SOP) for commercial fisheries communication. Where appropriate, ensuring that suitably qualified, local OFLOs will be on board survey or construction vessels; and
- Ensuring that all vessels transiting to the Morgan Generation Assets shall follow transit routes as defined in NtMs and on the Kingfisher Information Service of Seafish, where safe and practicable to do so.

Gear loss or snagging procedures and lost or damaged gear claims

1.1.1.31 The final FLCP will detail procedures to govern incidents of fishing gear fastening and for loss or damage of fishing gear claims. The procedures are anticipated to be in line with the latest FLOWW guidelines and any other applicable best practice.

1.3.3 Removal of static gear prior to construction or maintenance activities

1.1.1.32 Following early liaison with the commercial fishing industry and with the required notifications being distributed, as detailed within section 1.3.2, the Applicant requests that, in accordance with FLOWW guidance, local commercial fisheries stakeholders will cooperate and relocate any fishing gear in advance of activities commencing on confirmed dates. This is to avoid risks to health and safety associated with snagging of unexpected gear, damage to fishing gear and the potential for significant delays to essential construction or maintenance activities.

1.1.1.33 In an unlikely event that static fishing gear remains present within areas of planned construction or maintenance activities, irrespective of liaison with the fisheries industry taking place and all relevant notifications being distributed, the following processes will be followed:

- The OFLO shall notify the CFLO and FIR of static gear present, providing full details of the gear type, markings and location
- The CFLO, with aid from the FIR, shall take actions to identify the owner of the static fishing gear and request in writing, notification of receipt of request within three working days and removal of the gear within an agreed period
- If no response is received within three days and depending on the timetable of construction or maintenance activities, the Morgan Generation Assets may remove any static fishing gear found in the affected areas. The removal of static fishing gear has been included as a licensable activity within the deemed marine licences
- If an owner of the static fishing gear has been identified, any retrieved gear will be made available for collection by the owner. Alternatively, a claim form for lost gear can be made.

1.3.4 Co-existence during the construction phase

1.1.1.34 During construction of the Morgan Generation Assets, rather than complete closure of the Offshore Development Area (i.e. the Morgan Array Area), the Applicant has committed to the use of rolling advisory exclusion zones to minimise disruption to existing commercial fishing activities (Table 1.2). Rolling advisory exclusion zones will

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be implemented via the presence of temporary 500 m safety zones around vessels installing wind turbines and OSPs, and through rolling advisory exclusion zones of 500 m around vessels installing inter-array cables, interconnector cables. Safety zones of 50 m will also be in place around each item of infrastructure during the construction phase, where no construction works are taking place on that infrastructure (e.g. where a wind turbine generator is incomplete or is in the process of being tested before commissioning). Temporary restrictions to fishing activity and/or anchoring, will also be required in areas where full cable burial to target depth has not yet been achieved and/or surface-laid cable exists (prior to cover by external cable protection). In such areas of temporarily shallow-buried/surface-laid cable, the restricted areas will be monitored by guard vessels (as committed to within Table 1.2). Safety zones and advisory clearance distances, described above and set out within Table 1.2, are also described within the Safety Zone Statement (Document Reference J5) submitted at Application.

1.1.1.35 The Morgan Generation Assets will disseminate information to the fishing community through the use of notifications, as set out in section 1.2.2 and within the Draft DCO (Document Reference C1).

1.3.5 Co-existence during the operational and maintenance phase

Morgan Array Area

1.1.1.36 To seek to design the array layout to increase potential for co-existence and co-location, the Applicant has made a commitment to maintaining an area free of wind turbines and OSPs located over an area of core scallop grounds within the Morgan Array Area, termed the Scallop Mitigation Zone (SMZ). This is a direct result of consultation with the fishing industry. An indicative location for the SMZ, which has been presented to and discussed with commercial fisheries stakeholders is given in Figure 1.3 with co-ordinates provided in Table 1.3. It should be noted that wind turbines will be positioned along the perimeter of the SMZ (spaced at a minimum distance of 1,400 m apart) and that the final location of the SMZ may be subject to refinement through the final project design post-consent and that cables and cable protection are not excluded from this area, though the Applicant will seek to minimise cable routing through this area where possible.

1.1.1.37 In order to provide additional space for continued fishing and transit by commercial fisheries between and around the Morgan Array Area, the Applicant has increased the minimum spacing between infrastructure within the Morgan Array Area, increasing the spacing from 1,000 m between rows of wind turbines and 875 m between each wind turbine in a row to proposed minimum spaces of 1,400 m both within and between rows.

1.1.1.38 The Applicant has also committed to positioning wind turbine rows in a roughly north to south alignment and minimising the number of east to west aligned cables, where practically possible, to allow for continued fishing within the Morgan Array Area. 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. All cables, including those potentially east to west aligned, will be buried where possible to a target burial depth of 1 m, a maximum burial depth of 3 m and minimum depth of 0.5 m). Cable protection, where required, shall be designed to minimise snagging hazards as far as possible, for example by minimising height above seabed, smooth and shallower profiles, grade used for rock placement and type of rock (e.g. smoother edges) (as committed to within Table 1.2).

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Table 1.3: Scallop Mitigation Zone corner point coordinates in WGS 84 DDM format.

Point	Latitude (DDM)	Longitude (DDM)
1	54° 4.182825' N	4° 6.9159687.7759' W
2	53° 57.742167' N	4° 6.74391456' W
3	54° 0.4873506' N	4° 12.5904171' W

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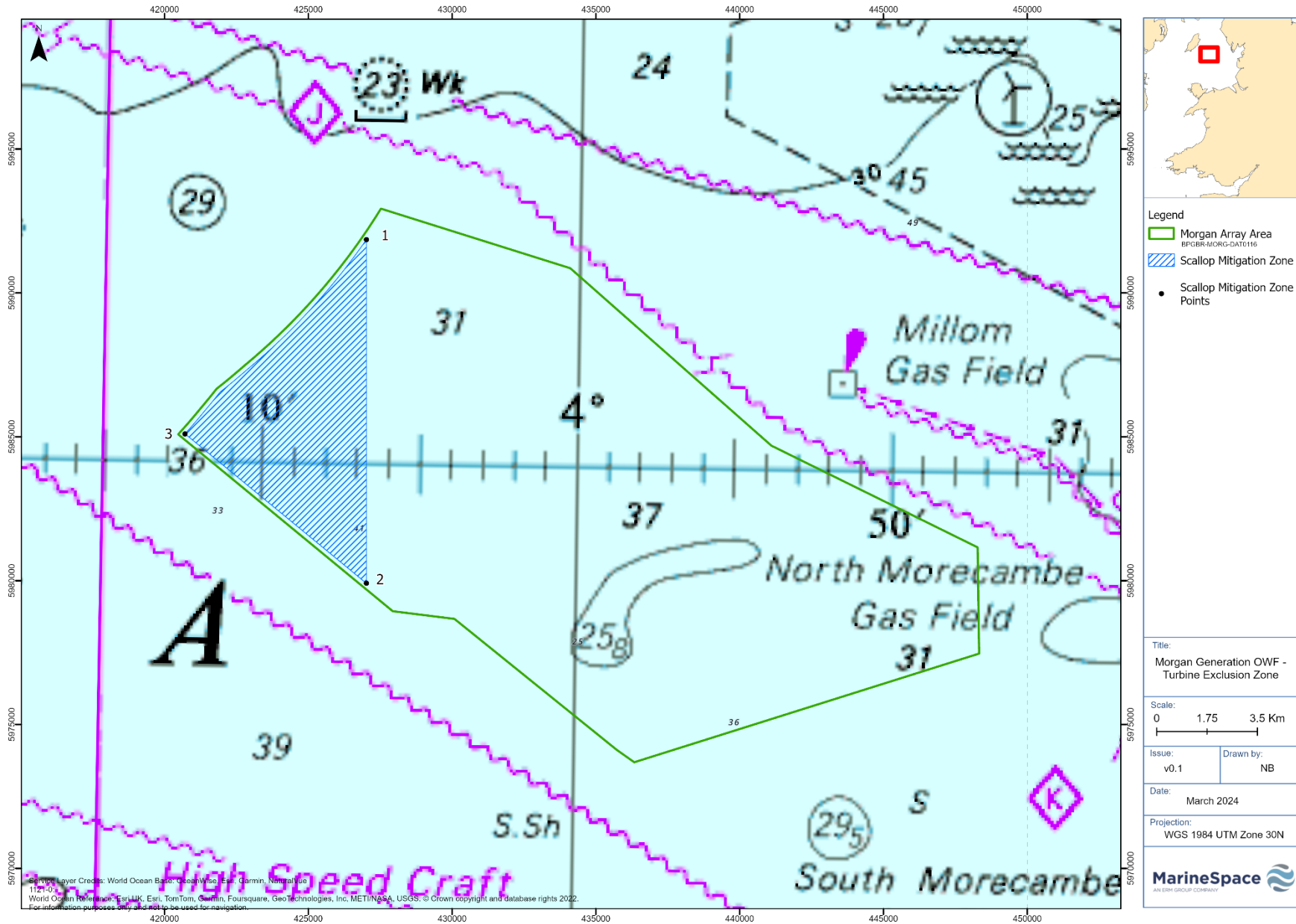


Figure 1.3: Indicative location of Scallop Mitigation Zone.

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1.4 Conclusions

- 1.1.1.39 This Outline FLCP has been produced in order to set out (a) the Applicant's strategy to facilitate and promote co-existence and co-location between the Morgan Generation Assets and commercial fishing interests, and (b) the approach to fisheries liaison during the construction, operational/maintenance and decommissioning phases. The aim of this outline document is to provide an overview of information that will be included within the final FLCP (which will be produced post-consent), such as details on fisheries liaison, engagement, safety issues and mitigation strategies.
- 1.1.1.40 This Outline FCLP has been developed with respect to feedback provided via project-specific consultation, aiding in the development of appropriate fisheries management and mitigation measures and reduction of potential impacts.
- 1.1.1.41 This Outline FLCP is a 'live' document and as such it will be further developed post-consent in consultation with regulatory bodies and stakeholders once the consent has been granted.
- 1.1.1.42 Key to the eventual success of the final FLCP will be open and transparent communication between the Morgan Generation Assets and the fishing industry. Whilst this will occur via the issue of formal communications such as NtMs and the use of OFLOs onboard selected offshore vessels, the key aspect underpinning future success will be maintenance and further development of the existing relationships that have been developed between the Applicant and key fisheries stakeholders since the inception of the Morgan Generation Assets back in 2021.
- 1.1.1.43 The Applicant is committed to continuing the engagement undertaken to date to ensure that the Morgan Generation Assets can be developed and operated in a way that minimises disturbance to the fishing industry and promotes co-existence and co-location. The Applicant had committed to investigating the establishment of a commercial fisheries working group, which can provide a forum for information sharing and discussion of key issues with commercial fisheries stakeholders and other developers in the region.

1.5 References

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