

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Offshore in-principle monitoring plan

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Image of an offshore wind farm

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Contents

1	OFFSHORE IN-PRINCIPLE MONITORING PLAN	1
1.1	Overview of the Offshore In-Principle Monitoring Plan.....	1
1.2	Description of the Morgan Generation Assets.....	1
1.3	General principles and guidance	2
1.3.1	Guidance	2
1.3.2	Principles	2
1.4	Consultation.....	3
1.5	In-principle proposals for monitoring	5
1.5.1	Approach	5
1.5.2	Engineering and design-related studies.....	6
1.6	Physical processes	7
1.6.1	Conclusions of the Environmental Statement	7
1.6.2	In-principle monitoring	7
1.7	Benthic subtidal ecology	8
1.7.1	Conclusions of the Environmental Statement	8
1.7.2	In-principle monitoring	8
1.8	Commercial fisheries	9
1.8.1	Conclusions of the Environmental Statement	9
1.8.2	In-principle monitoring	9
1.9	Shipping and navigation	10
1.9.1	Conclusions of the Environmental Statement	10
1.9.2	In-principle monitoring	10
1.10	Marine archaeology and cultural heritage	13
1.10.1	Conclusions of the Environmental Statement	13
1.10.2	In-principle monitoring	13
1.11	References	15

Tables

Table 1.1:	Key parameters for the Morgan Generation Assets.....	2
Table 1.2:	Key topics raised during consultation activities	3
Table 1.3:	In-principle monitoring proposed for physical processes.	7
Table 1.4:	In-principle monitoring proposed for benthic subtidal ecology.	8
Table 1.5:	In-principle monitoring proposed for commercial fisheries.....	9
Table 1.6:	In-principle monitoring proposed for shipping and navigation.....	10
Table 1.7:	In-principle monitoring proposed for marine archaeology and cultural heritage.	13

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the Environmental Impact Assessment (EIA) Directive and EIA Regulations, including the publication of an Environmental Statement.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Morgan Generation Assets: Generation Assets.
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.
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 DCO process.
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: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations/maintenance and decommissioning).
National Policy Statement(s)	The current national policy statements for energy published by the Department for Energy Security & Net Zero in 2024.
Offshore Substation Platform	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.
Palaeolandscapes	Terrestrial landscape features of a past geological age.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.

Acronyms

Acronym	Description
AFBI	Agri-Food and Bioscience Institute
AIS	Automatic identification system
AtoN	Aid to Navigation
DCO	Development Consent Order
DESNZ	Department for Energy Security & Net Zero
dML	Deemed Marine Licence

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Acronym	Description
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
HRA	Habitats Regulations Assessment
LAT	Lowest Astronomical Tide
MCA	Maritime and Coastguard Agency
MHWS	Mean High Water Springs
ML	Marine Licence
MMO	Marine Management Organisation
MU	Management Unit
NRA	Navigational Risk Assessment
NPS	National Policy Statement
OIPMP	Offshore In-Principle Monitoring Plan
OSP	Offshore Substation Platform
ROV	Remotely Operated Vehicle
SNCB	Statutory Nature Conservation Body
UKHO	United Kingdom Hydrographic Office
UXO	Unexploded Ordnance
VMS	Vessel Monitoring System

Units

Unit	Description
kg	Kilogram
km	Kilometre
km ²	Kilometre squared
m	Metre
nm	Nautical mile

1 Offshore In-Principle Monitoring Plan

1.1 Overview of the Offshore In-Principle Monitoring Plan

1.1.1.1 This Offshore In-Principle Monitoring Plan (OIPMP) has been produced to present and agree the objectives of any monitoring measures required within the deemed marine licences (dMLs) within the draft DCO (Document Reference C1). This document aims to:

- Compile relevant offshore monitoring as identified in the Environmental Impact Assessment (EIA) process
- Establish the objectives of this monitoring
- Present the guiding principles and framework through which monitoring activities associated with the construction and operation of the Morgan Generation Assets will be delivered.

1.1.1.2 This document provides assurance that necessary offshore monitoring associated with the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the Morgan Generation Assets) will be formally managed. It is intended that this document will provide the basis for further discussions with the Marine Management Organisation (MMO) and the relevant Statutory Nature Conservation Bodies (SNCBs) to agree the exact detail, including timing and methodologies for any offshore monitoring that is required by the deemed marine licence(s) within the draft DCO (Document Reference C1). It should be noted that the final detailed plans for monitoring work will not be produced until closer to the time that the licensed activities will be undertaken (following final scheme design). These will be agreed with MMO (as required by the conditions of the dMLs within the draft DCO (Document Reference C1)) in consultation with their statutory advisors where necessary.

1.2 Description of the Morgan Generation Assets

1.2.1.1 The Morgan Generation Assets is located in the east Irish Sea. The Morgan Array Area (i.e. the area within which the offshore infrastructure will be located) 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 (31.6 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).

1.2.1.2 A marine licence (ML) is required before carrying out any licensable marine activities under the Marine and Coastal Access Act 2009. The MLs for activities located in English offshore waters will be deemed under the Development Consent Order (DCO). The dMLs will cover works related to the offshore wind farm generation infrastructure (wind turbines, Offshore Substation Platforms (OSPs), foundations, inter-array cables and interconnector cables). This Offshore In-Principle Monitoring Plan is secured in the dMLs within the Draft DCO.

1.2.1.3 A detailed description of the Morgan Generation Assets is presented in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3). Key parameters of the Morgan Generation Assets are outlined in Table 1.1.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Table 1.1: Key parameters for the Morgan Generation Assets.

Parameter	Value
Morgan Array Area (km ²)	280
Average water depth (m Lowest Astronomical Tide (LAT))	-38.27
Maximum number of wind turbines	96
Maximum blade tip height above LAT (m)	364
Maximum number of Offshore Substation Platforms (OSPs)	4
Maximum length of inter-array cables (km)	390
Maximum length of interconnector cables (km)	60

1.3 General principles and guidance

1.3.1 Guidance

1.3.1.1 There are a number of guidance documents and reviews to draw on when considering the overarching principles in marine environmental monitoring. Of particular relevance to offshore wind farms is the independent review of post-consent environmental monitoring data undertaken by Fugro EMU Ltd on behalf of the Marine Management Organisation (MMO) (MMO, 2014a) and the MMO's subsequent recommendations (MMO, 2014b).

1.3.2 Principles

- Paragraphs 2.8.84 and 2.8.85 of the National Planning Statement (NPS) for Renewable Energy Infrastructure (EN-3) (Department for Energy Security & Net Zero (DESNZ), 2023) states that:
'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 Habitats Regulations Assessments (HRAs).'
- Monitoring should have a clear purpose and be designed to provide answers to specific questions where significant environmental impacts have been identified (Cefas, 2012; Glasson *et al.*, 2011; OSPAR, 2008). As such (and in-line with the MMO's recommendations for targeted monitoring (MMO, 2014b)), monitoring proposals should have an identified frequency (and/or duration) and confirmed outputs, which provide statistically robust datasets designed to address the hypothesis being tested
- The presence of a significant impact identified in the EIA should not, in itself, lead to a requirement for monitoring. Monitoring should address significant evidence gaps or uncertainty relevant to the Morgan Generation Assets, where it is realistic for those gaps to be filled or uncertainty reduced significantly. Monitoring should also be targeted at those features considered to be particularly sensitive to the impacts of the development, especially where these features are of economic or environmental importance. MMO (2014b) advise that the greatest focus should be placed on impacts of concern for which the highest uncertainty remains. Such

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

targeted monitoring is more likely to answer key uncertainties than broad scale/generic monitoring approaches

- Proposals for monitoring should be based, where relevant, on the best practice and outcomes of the latest review of environmental data (i.e. best available evidence) associated with post-consent monitoring of licence conditions of offshore wind farms (MMO, 2014b)
- An iterative approach should be taken whereby the scope and design of any new monitoring work should be based on a review of the findings of any preceding phases of monitoring or relevant survey work, including surveys carried out in support of the EIA for the Morgan Generation Assets. It is acknowledged that the MMO may require amendments to individual monitoring programmes if the evidence indicates the existing monitoring programme is not fit for purpose and/or impacts are not as predicted
- Where site specific monitoring is undertaken pre- and post-construction it may be relevant to consider undertaking monitoring over non-consecutive years
- Under certain circumstances for addressing specific uncertainties it may be more appropriate to adopt a strategic approach to the monitoring. Strategic monitoring (potentially with the boundaries of the Morgan Generation Assets) may be considered where contributing to the answering of a broader question (that is still linked to the relevant receptors) is likely to offer greater ability to address key questions than any site-specific monitoring may achieve. Such strategic work may need to be de-coupled from any specific phase of the Morgan Generation Assets.

1.4 Consultation

1.4.1.1 Table 1.2: presents key topics raised during consultation activities undertaken for the Morgan Generation Assets relevant to monitoring.

Table 1.2: Key topics raised during consultation activities

Date	Consultee and type of response	Topics raised	Response to topic raised and/or where considered in the application
01 June 2023	Isle of Man Government,	Underwater noise impacting fish and shellfish receptors of Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement (Document Reference F2.3). Further mitigation: ‘...further mitigation is currently being investigated to minimise risks of significant impacts if piling occurs during the herring spawning season.’ Agree that this is appropriate, and recommend specific consultation with AFBI on herring spawning, and inclusion of Isle of Man Government (DEFA) due to developing interest in the fishery and relevant herring legislation covering the proposed array area.	The implementation of piling soft-start and ramp-up measures is set out Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement (Document Reference F2.3). 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; see the Outline underwater sound management strategy (Document Reference J13). Monitoring relevant to fish and shellfish is considered in Table 3.43 of Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement (Document Reference F2.3).

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Date	Consultee and type of response	Topics raised	Response to topic raised and/or where considered in the application
06 February 2023	Isle of Man Government	Will monitoring of fishing patterns during and post-construction be undertaken to confirm these conclusions? This may be important to the Isle of Man, particularly if displaced vessels also hold Manx licences.	No monitoring of fishing patterns post construction is proposed. However, the Applicant has made a commitment to annually review for the first five years of the operations and maintenance phase Vessel Monitoring System (VMS) and landings data to contribute to the evidence base for fishing activity in and around offshore wind farms. This commitment is secured within the Outline fisheries liaison and co-existence plan (Document Reference J10).
6 February 2023	Isle of Man Department of Infrastructure	Monitoring of the cables and their burial status to reduce snagging risk. Annual reviews for the first five years of the operational phase, to review VMS data and landings data to identify whether there are any changes to fishing activity within the Morgan Array Area.	Monitoring relevant to commercial fisheries is considered in Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). An Offshore Construction Method Statement post-consent with details of cable monitoring to reduce snagging risk will be prepared. The Applicant has made a commitment to annually review for the first five years of the operations and maintenance phase of VMS and landings data to contribute to the evidence base for fishing activity in and around offshore wind farms. This commitment is secured within the Outline fisheries liaison and co-existence plan (Document Reference J10).
06 April 2023	NFFO and WFA	A monitoring plan to monitor the scallop fishing fleet over a five-year period does not fall into any of the "Avoid, Minimise, Mitigate" categories. What are the protocols to be followed if an effect is observed?	The Applicant has made a commitment to Annual review for the first five years of the operations and maintenance phase of VMS and landings data to contribute to the evidence base for fishing activity in and around offshore wind farms. If changes are identified this will be discussed with commercial fisheries stakeholders. This commitment is secured within the Outline fisheries liaison and co-existence plan (Document Reference J10).

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Date	Consultee and type of response	Topics raised	Response to topic raised and/or where considered in the application
31 May 2023	MMO	The MMO would expect the effects on benthic ecology receptors to be monitored, to determine whether the predictions of the Environmental Statement (ES) are accurate, especially when sensitive features are potentially at risk. Once more additional information is provided regarding 'fragile sponge and anthozoan communities on rocky habitats' the MMO will be able to advise whether monitoring is required.	<p>No significant effects have been concluded as a result of the Morgan Generation Assets alone or cumulatively with other projects and so no monitoring has been proposed. Monitoring related to undertaking maintenance activities is outlined in Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3). Any suitable data available from this monitoring will be reviewed for the identification of INNS in accordance with the INNS Management Plan which will be included in the Offshore Environment management Plan (EMP; subject to data quality). See Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2) and section 1.7 of this document for further details.</p> <p>Additional information and data regarding the 'fragile sponge and anthozoan communities on rocky habitats' has been provided in Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental Statement (Document Reference F4.2.1).</p>
31 May 2023	MMO	The MMO agrees with the best-practice measures that have been outlined in Section 4.2.6.1 of the scoping report for fisheries and fish ecology, all of which are appropriate. The requirement for further mitigation or monitoring will be determined on the outcome of the EIA process, which I agree is appropriate.	Monitoring relevant to fish and shellfish is considered in Volume 2, Chapter 3: Fish and shellfish of the Environmental Statement (Document Reference F2.3). Based on the outcome of the assessment no monitoring is suggested.

1.5 In-principle proposals for monitoring

1.5.1 Approach

1.5.1.1 This document outlines the rationale behind the proposed monitoring, with a view to reducing uncertainty when drafting the final plans post grant of a DCO. Following an iterative approach, it should be recognised that increased knowledge and understanding based on survey outcomes may influence the design of subsequent monitoring work. The focus, requirements and methodologies for future monitoring for the Morgan Generation Assets may therefore differ from the outline approach presented in this document. Any such future modifications to monitoring approaches will be the subject of ongoing consultation between the Applicant, MMO and its statutory advisers. This document can be varied as required by MMO, in consultation with the Applicant.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.5.1.2 Topics which do not state relevant monitoring measures are not considered in this report. The topics which stated relevant monitoring measures are discussed in this document and are listed as follows:

- Physical processes
- Benthic subtidal ecology
- Commercial fisheries
- Shipping and navigation
- Marine archaeology and cultural heritage.

1.5.1.3 For each topic, a table is presented which details:

- The potential effects and receptor(s) for which monitoring is considered necessary
- Monitoring objectives
- The approach to monitoring
- Residual effect
- Links to other monitoring
- Method of securing monitoring
- Rationale.

1.5.1.4 For each topic, the tables are divided into sections for pre-construction monitoring, construction monitoring and post-construction monitoring. At this stage, no monitoring approaches are outlined for the decommissioning phase.

1.5.2 Engineering and design-related studies

1.5.2.1 Studies will be undertaken for engineering purposes in addition to the environmental monitoring required under conditions of the dML(s) within the draft DCO (Document Reference C1). Some of these studies will overlap with the conditioned monitoring and, wherever possible, the Applicant will endeavour to combine surveys for monitoring purposes with those already being carried out for engineering purposes. These are:

- Geotechnical
- Unexploded ordnance (UXO) survey
- Remotely operated vehicle (ROV) survey
- Cable burial survey.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.6 Physical processes

1.6.1 Conclusions of the Environmental Statement

1.6.1.1 The potential impacts of the Morgan Generation Assets on physical processes receptors have been assessed within Volume 2, Chapter 1: Physical processes of the Environmental Statement (Document Reference F2.1). All impacts were assessed as being of **no significance** in EIA terms following the application of appropriate measures adopted as part of the Morgan Generation Assets, therefore, in terms of physical processes, no specific monitoring is recommended beyond those related to undertaking maintenance activities outlined in the Volume 1, Chapter 3: Project description of the Environmental Statement (Document Reference F1.3).

1.6.2 In-principle monitoring

1.6.2.1 Table 1.3 provides information on the monitoring commitments for physical processes.

Table 1.3: In-principle monitoring proposed for physical processes.

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Post-Construction						
Impacts to sediment transport and sediment transport pathways due to presence of infrastructure and associated potential impacts to physical features and bathymetry	Sediment transport and sediment transport pathways	To monitor the effect of sediment transport and sediment transport pathways on cable burial.	Monitoring of the cables and their burial status.	Benthic subtidal ecology (Table 1.4), Commercial fisheries (Table 1.5), Shipping and navigation (Table 1.6), Marine archaeology and cultural heritage (Table 1.7).	Condition in the deemed marine licences within the Draft DCO (Document Reference C1).	To understand whether sediment movement in the Morgan Array Area has affected cable burial.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.7 Benthic subtidal ecology

1.7.1 Conclusions of the Environmental Statement

1.7.1.1 The potential impacts of the Morgan Generation Assets on benthic subtidal ecology receptors have been assessed within Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Document Reference F2.2). All impacts were assessed as being of **minor adverse** or lower significance following the application of appropriate measures adopted as part of the Morgan Generation Assets. The commitment to the monitoring of cables and their burial status has been included as this is considered industry best practice.

1.7.2 In-principle monitoring

1.7.2.1 Table 1.4 provides information on the monitoring commitments for benthic subtidal ecology.

Table 1.4: In-principle monitoring proposed for benthic subtidal ecology.

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Post-construction						
Changes to physical processes	Benthic subtidal ecology	To monitor the effect of physical processes on cable burial.	Monitoring of the cables and their burial status.	Physical processes (Table 1.3), shipping and navigation (Table 1.6), Commercial fisheries (Table 1.5) and marine archaeology and cultural heritage (Table 1.7).	Secured through relevant conditions in the dMLs within the DCO.	To understand whether sediment movement in the Morgan Array Area has affected cable burial.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.8 Commercial fisheries

1.8.1 Conclusions of the Environmental Statement

1.8.1.1 The potential impacts of the Morgan Generation Assets on commercial fisheries receptors have been assessed within Volume 2, Chapter 6: Commercial fisheries of the Environmental Statement (Document Reference F2.6). All impacts were assessed as being of **no significance** following the application of appropriate measures adopted as part of the Morgan Generation Assets. The commitment to monitoring of cable routes (in the array area) and their burial status has been included as this is considered industry best practice.

1.8.2 In-principle monitoring

1.8.2.1 Table 1.5 provides information on the monitoring commitments for commercial fisheries.

Table 1.5: In-principle monitoring proposed for commercial fisheries.

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Post - construction						
Loss or damage to fishing gear due to snagging	Fishing vessels	To identify and reduce snagging risk.	Preparation of an Offshore Construction Method Statement post-consent with details of cable monitoring to reduce snagging risk.	Shipping and navigation (Table 1.6)	Condition in the deemed marine licence(s) within the draft DCO (Document Reference C1).	To understand whether cables associated with the Morgan Array Area have or have the potential to snag fishing gear.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.9 Shipping and navigation

1.9.1 Conclusions of the Environmental Statement

1.9.1.1 The potential impacts of the Morgan Generation Assets on shipping and navigation receptors have been assessed within Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (Document Reference F2.7). All impacts were assessed as being of **minor adverse** or **lower significance** following the application of appropriate measures adopted as part of the Morgan Generation Assets, other than:

- Impacts to adverse weather routeing, assessed as **moderate adverse** for all phases (construction, operations and maintenance, and decommissioning)
- Impacts to commercial operators including strategic routes and lifeline ferries, which when assessed cumulatively with other existing and planned projects, plans and activities considered within the Cumulative Effects Assessment, assessed as **moderate adverse** for all phases.

1.9.2 In-principle monitoring

1.9.2.1 Table 1.6 provides information on the monitoring commitments for shipping and navigation.

Table 1.6: In-principle monitoring proposed for shipping and navigation.

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Construction						
All impacts on vessel routeing and safety	Marine traffic	To assess the extent to which the impacts predicted in the Navigational Risk Assessment (NRA) are accurate.	Construction monitoring of marine traffic (by automatic identification system (AIS)) with a report submitted annually to MMO, MCA and Trinity House. The report will assess the extent to which the impacts predicted in the NRA are accurate to	N/A	Condition in the deemed marine licence(s) within the draft DCO (Document Reference C1).	To ensure adopted risk controls are fit for purpose.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
			ensure adopted risk controls are fit for purpose.			
Impact on snagging risk to vessel anchor and fishing gear	Marine traffic	To identify and reduce snagging risk.	Periodic validation surveys of cable burial and protection to ensure specified requirements are met.	Commercial fisheries (Table 1.5)	Condition in the deemed marine licence(s) within the draft DCO (Document Reference C1).	To understand whether cables associated with the Morgan Array Area have or have the potential to snag fishing gear
Post-construction						
Impact on allision (contact) risk to vessels	Marine traffic	To ensure constant functionality of Aids to Navigation (AtoNs) throughout the lifetime of the Morgan Generation Assets.	AtoN monitoring. Trinity House to be informed of any defects.	N/A	Condition in the deemed marine licence(s) within the draft DCO (Document Reference C1).	To minimise the likelihood of allision.
All impacts on vessel routing and safety	Marine traffic	To assess the extent to which the impacts predicted in the NRA are accurate.	Post-construction monitoring of marine traffic (by AIS) with a report submitted annually to MMO, MCA and Trinity House. The report will assess the extent to which the impacts predicted in the NRA are accurate to ensure adopted risk controls are fit for purpose.	N/A	Condition in the deemed marine licence(s) within the draft DCO (Document Reference C1).	To ensure adopted risk controls are fit for purpose.
Impact on snagging risk to vessel anchor and fishing gear	Marine traffic	To identify and reduce snagging risk.	Periodic validation surveys of cable burial and protection to ensure	Commercial fisheries (Table 1.5)	Condition in the deemed marine licence(s) within the draft DCO	To understand whether cables associated with the Morgan Array Area

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
			specified requirements are met.		(Document Reference C1).	have or have the potential to snag fishing gear

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

1.10 Marine archaeology and cultural heritage

1.10.1 Conclusions of the Environmental Statement

1.10.1.1 The potential impacts of the Morgan Generation Assets on marine archaeology receptors have been assessed within Volume 2, Chapter 8: Marine archaeology and cultural heritage of the Environmental Statement (Document Reference F2.8). All impacts were assessed as being of **no significance** following the application of appropriate measures adopted as part of the Morgan Generation Assets. The impacts assessed include:

- Sediment disturbance and deposition leading to indirect impacts on marine archaeology receptors
- Direct damage to marine archaeology receptors (e.g. wrecks, debris, submerged prehistoric receptors (palaeolandscapes and associated archaeological receptors)
- Direct damage to deeply buried marine archaeology receptors – submerged prehistoric receptors (e.g. palaeolandscapes and associated archaeological receptors)
- Alteration of sediment transport regimes
- Effects on historic seascape character
- Effects on settings of terrestrial designated historic assets.

1.10.2 In-principle monitoring

1.10.2.1 Table 1.7 provides information on the monitoring commitments for marine archaeology and cultural heritage.

Table 1.7: In-principle monitoring proposed for marine archaeology and cultural heritage.

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Construction						
Sediment disturbance and deposition leading to indirect impacts on marine archaeology receptors	Marine archaeology	The protection and recording of any archaeological material that may be encountered throughout all phases of the Morgan Generation Assets	The proposed mitigation strategy, which is based on the current understanding of archaeological remains and construction techniques, does not require a marine watching brief. Should	N/A	Outline Offshore WSI and PAD is secured within the deemed marine licence(s) of the draft DCO	To ensure that any previously unknown archaeological material is recorded and protected

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Potential effect	Receptor	Monitoring objectives	Monitoring approach	Links to other monitoring	Method of securing monitoring	Rationale
Direct damage to marine archaeology receptors			<p>future work lead to the identification of further archaeological remains, or should the construction methods or locations be altered, a marine watching brief may be required.</p> <p>If significant archaeological or palaeoenvironmental evidence are encountered then the Applicant, in consultation with Historic England, will make provision for the Archaeological Contractor to undertake a programme of investigation commensurate with the evidence discovered as relevant.</p>		(document reference C1).	
Sediment disturbance and deposition leading to indirect impacts on marine archaeology receptors	Marine archaeology	To establish the appropriateness and effectiveness of Archaeological Exclusion Zones (AEZs) throughout all phases of the Morgan Generation Assets	Development of, and adherence to, an Outline Offshore WSI including the establishment of PAD, which through the acquisition of relevant spatial survey data, includes monitoring of AEZs. This monitoring will include the appropriateness of, and adjustments that need to be made to, AEZs during the lifetime of Morgan Generation Assets, where required	N/A	Outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) and the need for a Design Plan to be approved is secured within the deemed marine licence(s) of the draft DCO (document reference C1).	To assess the long term, indirect impacts of the Morgan Generation Assets on marine archaeology receptors.

1.11 References

Cefas. (2012). Guidelines for data acquisition to support marine environmental assessments of offshore renewable energy projects. Cefas contract report: ME5403 – Module 15.

Department for Energy Security & Net Zero (2023) National Policy Statement for Renewable Energy Infrastructure (NPS EN-3). Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147382/NPS_EN-3.pdf. Accessed September 2023.

Glasson J, Therivel R, Chadwick A. (2011). Introduction to Environmental Impact Assessment. 4th edition. The Natural and Built Environment Series.

MMO (2014a) Review of Post-Consent Offshore Wind Farm Monitoring Data Associated with Licence Conditions MMO Project No: 1031.

MMO (2014b). The MMO Response to an Independent Review of Environmental Data Collected at UK and European Offshore Wind Farms and 22 Recommendations for Future Post-Consent Monitoring.

OSPAR (2008). Guidance on Environmental Considerations for Offshore Wind Farm Development. Available: <https://www.vliz.be/imisdocs/publications/ocrd/224682.pdf>. Accessed September 2023.