Partners in UK offshore wind

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Biodiversity benefit statement

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Image of an offshore wind farm

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RPS

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Morgan Offshore Wind Ltd.

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Glossary

Term	Meaning
Project terminology	
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for one or more Nationally Significant Infrastructure Project (NSIP).
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Morgan Generation Assets.
Evidence Plan Process	The Evidence Plan process is a mechanism to agree upfront what information the Applicant needs to supply to the Planning Inspectorate as part of the Development Consent Order (DCO) application for the Morgan Generation Assets.
Habitat	The environment that a plant or animal lives in.
Intertidal area	The area between Mean High Water Springs and Mean Low Water Springs.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, offshore export cables and offshore substation platforms (OSPs) forming part of the Morgan 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 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.
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2023.
Offshore Substation Platform (OSPs)	The offshore substation platforms located within the Morgan Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.
Subtidal	Area extending from below low tide to the edge of the continental shelf.

Acronyms

Acronym	Description
CIEEM	Chartered Institute of Ecology and Environmental Management
DCO	Development Consent Order
Defra	Department for Environment, Food and Rural Affairs
EIA	Environmental Impact Assessment
EnBW	Energie Baden-Württemberg AG
ES	Environmental Statement
JNCC	Joint Nature Conservation Committee

Acronym	Description
MRF	Marine Recovery Fund
MMO	Marine Management Organisation
NWMP	North West Inshore and North West Offshore Marine Plan
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
SSSI	Site of Special Scientific Interest

Units

Unit	Description
MW	Megawatt
nm	Nautical Mile
%	Percent

1 Introduction

1.1.1.1 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: Generation Assets (hereafter Morgan Generation Assets), a proposed wind farm in the Irish Sea.

1.1.1.2 The Morgan Array Area is located in English offshore waters (beyond 12 nm from the English coast). As the Morgan Generation Assets is an offshore generating station with a capacity of greater than 100 MW located in English waters, it is a Nationally Significant Infrastructure Project (NSIP) as defined by Section 15(3) of the Planning Act 2008 (the 2008 Act). As such, there is a requirement to submit an application for a Development Consent Order (DCO) to the Planning Inspectorate to be decided by the Secretary of State (SoS) for the Department for Energy Security and Net Zero (DESNZ).

1.1.1.3 The Morgan Generation Assets has been subject to 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).

1.1.1.4 Morgan Offshore Wind Limited has a specific objective to 'seek to enhance biodiversity as a result' of its work. This Biodiversity benefit statement outlines the policy relating to the provision of net biodiversity benefit across the Morgan Generation Assets. The Statement then describes how biodiversity net benefit will be achieved across the offshore and connected coastal elements of the Project.

1.1.1.5 This document should be read in conjunction with the following documents:

- Volume 2, Chapter 1: Physical processes of the Environmental Statement (ES) (document reference F2.1)
- 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)
- Volume 2, Chapter 5: Offshore ornithology of the Environmental Statement (document reference F2.5).

2 Policy Requirements and Legislation

2.1 Biodiversity policy and legislation

2.1.1.1 There is no legislative requirement for NSIPs to deliver net benefits for biodiversity in the offshore environment and there is currently no clear policy basis or guidance to do so. This is an area of developing policy and legislation and this section sets out the planning policy and legislation that the Applicant considers are relevant to the evolving context for the provision of net biodiversity benefit.

2.1.1 National Policy Statement EN-1

2.1.1.1 Overarching National Policy Statement (NPS) for Energy (EN-1) sets out the UK Government's policy for the delivery of major energy infrastructure (Department for Energy Security & Net Zero, 2024). The need for net biodiversity benefit is set out in NPS EN-1, section 4.6 states:

"Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.

Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.

Currently biodiversity net gain policy in England only applies to terrestrial and intertidal components of projects. Principles for Marine Net Gain are currently being rolled out by the Government, who will provide guidance in due course. There are provisions in the Environment Act 2021 to allow Marine Net Gain to be made mandatory for NSIPs in the future… … Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.

2.1.1.2 Paragraph 5.4.19 requires applicants to:

"show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological interests."

2.1.1.3 National Policy Statement (NPS) for Energy (EN-1) also reflects nature inclusive design within the policies and requires consideration of net gain opportunities that can be embedded in the project design. Paragraph 5.4.21 states that:

"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. The scope of potential gains will be dependent on the type, scale, and location of each project."

2.1.1.4 Paragraph 5.4.33 specifies that:

"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*."*

2.1.2 North West Inshore and North West Offshore Marine Plan

2.1.2.1 The North West Inshore and North West Offshore Marine Plan (NWMP) was formally adopted by Defra in 2021. The NWMP provides a framework to inform decisions over how the marine environment is developed, protected and improved over the years until 2041 (Defra, 2021). The plan forms part of the policy framework that guides public authority decision-making in the north west marine plan areas. The public authority (SoS) 'must have regard' to the NWMP alongside any relevant National Policy Statements when making decisions in relation to Nationally Significant Infrastructure Projects. Biodiversity conservation, enhancement and restoration forms part of the vision for the NWMP. The NWMP includes policies that are supportive of offshore wind energy. For example, policy NW-REN-1 states that 'Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported' and policy NW-REW-3 states 'Proposals for the installation of infrastructure to generate offshore renewable energy, inside areas of identified potential and subject to relevant assessments, will be supported.'

2.1.2.2 With reference to biodiversity enhancement, policy NW-BIO-1 of the NWMP (Biodiversity) has the following aim:

"Maintaining the distribution of priority habitats and priority species in the north west marine plan areas is important as it reduces habitat fragmentation, species isolation and supports strong, biodiverse communities which in turn provide ecosystem services. NW-BIO-1 encourages and supports proposals that enhance the distribution of priority habitats and priority species. NW-BIO-1 seeks to maintain the distribution of priority habitats and priority species through the management of significant adverse impacts. Proposals that cannot avoid, minimise and mitigate or, as a last resort, compensate for significant adverse impacts, will not be supported."

2.1.2.3 Policy NW-BIO-2 sets out the policy aim regarding native habitat and species adaptation and connectivity in the marine environment:

"Competition for space, increased levels of development, and predicted effects of climate change can affect the connectivity, adaptive ability and migration of habitats and species in the north west marine plan areas. NW-BIO-2 supports and encourages proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration. NW-BIO-2 requires proposals to manage negative effects which may significantly adversely impact the functioning of healthy, resilient and adaptable marine ecosystems."

2.1.2.4 The North West Marine Plan (Defra, 2021) states:

"Government has committed to the development of net gain under the 25 Year Environment Plan, and biodiversity net gain in land-based (terrestrial) situations has been developed to the mean low water mark (intertidal).

Work to consider how net gain might be delivered in the marine area is in progress but not sufficiently well advanced to include in this marine plan at this time."

2.1.3 Environment Act 2021

2.1.3.1 The Environment Act sets out targets, plans and policies for environmental protection.

2.1.3.2 Schedule 15 of the Environment Act, which is not currently in force, sets out provisions for biodiversity net gain for NSIPs and amends the Planning Act 2008. This includes the requirement for the production of biodiversity net gain statements for NSIPs. The

stated intention is for the requirements of the Environment Act in relation to biodiversity to be implemented no later than 2025.

2.1.3.3 It is noted that the requirement would not initially apply to elements of projects which are located in the marine environment (such as those taking place entirely below the low-water mark) (Defra, 2022).

2.1.4 The Convention on Biological Diversity

2.1.4.1 The Convention on Biological Diversity is an international legal instrument ratified by the UK in 1994 and which has the following three main objectives:

- the conservation of biological diversity
- the sustainable use of the components of biological diversity and
- the fair and equitable sharing of the benefits arising out of the utilization of genetic resources.

2.1.4.2 The overall objective is to encourage actions that will lead to a sustainable future including marine and coastal biodiversity. The Secretariat of the Convention is based in Montreal in Canada and aims to assist governments to implement the Convention and its programmes of work. At the UN Convention on Biological Diversity Conference of the Parties, COP15 in 2022, nations including the UK Government set targets for 2030 including:

- Target 2- Ensure that by 2030 at least 30 per cent of areas of degraded terrestrial, inland water, and coastal and marine ecosystems are under effective restoration, in order to enhance biodiversity and ecosystem functions and services, ecological integrity and connectivity.

Target 3 - Ensure and enable that by 2030 at least 30 per cent of terrestrial, inland water, and of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed.

2.1.5 The Marine Strategy Framework Directive

2.1.5.1 The Marine Strategy Framework Directive (MSFD) aims to protect more effectively the marine environment across Europe. The MSFD is transposed for the whole of the UK by the Marine Strategy Regulations 2010, providing a UK-wide framework for meeting the requirements of the Directive. It requires Member States to take measures to achieve or maintain Good Environmental Status (GES). Achieving GES is about protecting the marine environment, preventing its deterioration and restoring it where practical, while allowing sustainable use of marine resources. GES is described in relation to eleven descriptors which help to define the state of the marine environment, these cover both environmental indicators and anthropogenic pressure.

2.1.5.2 The MSFD's high level descriptors of Good Environmental Status (GES) relevant to marine ecology and biodiversity include:

- Descriptor 1: Biological diversity:
  - Biological diversity is maintained. The quality and occurrence of habitats and the distribution and abundance of species are in line with prevailing physiographic, geographic and climatic conditions.
- Descriptor 4: Elements of marine food webs:

– All elements of the marine food webs, to the extent that they are known, occur at normal abundance and diversity and levels capable of ensuring the long term abundance of the species and the retention of their full reproductive capacity.

2.1.6 A Green Future: Our 25 Year Plan to Improve the Environment

2.1.6.1 The UK Government's 25 Year Plan to Improve the Environment was published in 2018 and sets out the government action to be taken to help the natural world regain and retain good health (Defra, 2018). It aims to deliver cleaner air and water, protect threatened species and provide richer wildlife habitats. Recovering nature and securing clean, healthy, productive and biologically diverse seas and oceans are two of the key policies identified by the Government to focus action to protect and enhance the environment. The 25 Year Plan states:

"We will achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife. At sea, we will do this by:

- Reversing the loss of marine biodiversity and, where practicable, restoring it.
- Increasing the proportion of protected and well-managed seas, and better managing existing protected sites.
- Making sure populations of key species are sustainable with appropriate age structures.
- Ensuring seafloor habitats are productive and sufficiently extensive to support healthy, sustainable ecosystems."

2.1.7 Environmental Improvement Plan 2023

2.1.7.1 The Environmental Improvement Plan is the first review of the 25 Year Environment Plan and sets out the UK Government's plan to deliver (Defra, 2023b). The apex goal of the Environmental Improvement Plan 2023 is to improve nature: *"We will halt the decline in our biodiversity so we can achieve thriving plants and wildlife".*

2.1.7.2 One of the objectives included in the Plan is to:

"Increase the resilience of our natural environment by restoring degraded habitats and habitat creation."

2.1.8 Action Plan for NSIPs

2.1.8.1 The Applicant notes the recent Action Plan NSIPs (Department for Levelling Up, Housing and Communities, 2023), which was published in February 2023, proposes to incorporate biodiversity net gain requirements for all terrestrial NSIPs, from December 2025. The Department for Environment, Food and Rural Affairs (Defra) plan to consult on the details for the biodiversity net gain proposals for NSIPs in Spring 2024 before publishing final guidance in September 2024.

2.1.8.2 However, until this comes into force, the position for NSIPs in England remains unchanged with no current requirements to quantify biodiversity losses and gains through use of a metric. It is recognised that a complementary marine net gain system is under development and Defra has consulted on the principles of marine net gain in English waters (Defra, 2022). The consultation responses confirmed strong support from a wide range of stakeholders for the principles of marine net gain and therefore the government will continue to develop the details of the relevant policy required

(Defra, 2023a). Defra will be required to consult again before any policy can be implemented.

2.1.8.3 Given the current timescale of the ongoing government consultation, it is assumed to be unlikely that there will be any formalisation of the requirement for the delivery of biodiversity net gain for offshore NSIPs within the DCO determination timeframe of Morgan Generation Assets. However, the Applicant is committed to engaging positively with this concept as it becomes stipulated in policy and guidance is made available.

2.1.9 Summary

2.1.9.1 The policies summarised above set out that there is currently no statutory obligation nor implementation guidance for NSIPs on the delivery of biodiversity net gain nor is there for any requirement for biodiversity enhancement in the marine environment. However, the policies set out consistent objectives for projects to provide:

- Evidence that the project has sought to minimise impacts to ecological receptors
- Net gains for biodiversity
- Facilitate native species and habitat diversity and connected ecological networks to support healthy, sustainable ecosystems
- Take opportunities to contribute towards restoration of degraded habitats

  Show how the project has considered opportunities to conserve and enhance biodiversity.

3 Delivering Biodiversity Benefit

3.1.1.1 Nature based principles have been applied to the design of the Morgan Generation Assets from the outset. The Applicant has followed the mitigation hierarchy, defined as avoid, reduce, mitigate or compensate and consider enhancement opportunities (as set out NPS EN-1, see section 2.1.2) and this step-wise approach applied to the Morgan Generation Assets is described in section 3.3. Throughout the pre-application process the Applicant has engaged with Natural England, the Joint Nature Conservation Committee (JNCC), the Marine Management Organisation (MMO) and other relevant stakeholders through the Evidence Plan Process. The Applicant has requested advice on potential marine biodiversity enhancement opportunities and sought feedback on the approach to biodiversity mitigation throughout the EIA process.

3.2 A qualitative, rather than quantitative, approach

3.2.1.1 The Applicant is aware of the forthcoming mandatory requirement for 10% measurable biodiversity net gain for NSIPs in England that will come into force in 2025. However, for the marine environment, there is currently no requirement for biodiversity enhancement or to quantify losses and gains, e.g. using a metric. A qualitative approach will be taken by the Applicant (without use of a metric) whilst the development of a marine habitats metric, to assess the impacts of habitat change, is under development by Natural England (Defra, 2022). Once the marine habitats metric is published the Applicant will welcome discussions with Natural England on the use of the metric for marine biodiversity benefit.

3.2.1.2 The Marine Net Gain (MNG) consultation (Defra, 2022) stated that Defra are considering a contributions-based approach. The consultation document states:

"Net gain requirements would take the form of financial contributions which would be used to fund priority environmental enhancement or restoration projects. The financial contributions would be managed through the Marine Recovery Fund (MRF) within the Offshore Wind Environmental Improvement Package of the British Energy Security Strategy. The fund will be developed to deliver strategic MPA compensation and subsequently MNG…

… We propose to continue work to adapt the biodiversity metric to be applicable to the marine environment, but to prioritise developing the contributions-based approach, which will be ready to implement in a far shorter time frame."

3.2.1.3 There has been delay to development of a contributions-based fund, but the Applicant is engaging with stakeholders and keeping a watching brief regarding the potential framework for delivery, potential hybrid approaches and progress.

3.2.1.4 In developing the proposed biodiversity benefit measures for the Morgan Generation Assets, the Applicant has employed ecological specialists to undertake baseline ecology surveys, impact assessments, identification of mitigation measures and potential marine biodiversity enhancement options, relevant to the project whilst engaging with stakeholders on biodiversity benefit opportunities.

3.2.1.5 The Applicant considers that net benefit for marine biodiversity will be achieved through the provision of biodiversity benefit measures, in addition to sufficient mitigation that will be put in place to reduce and/or eliminate the potential for significant effects as part of the mitigation hierarchy.

3.3 A step-wise approach

3.3.1.1 National Policy Statement EN-1 and the North West Marine Plan requires applicants to apply a 'step-wise' approach to maintaining and enhancing biodiversity following the mitigation hierarchy. Table 3.1 outlines how the Applicant has applied the step-wise approach during the development of the Morgan Generation Assets EIA.

Table 3.1: Morgan Generation Assets step-wise approach to marine biodiversity benefit

Step	How the Morgan Generation Assets considered the step	Further information
Step 1 – avoid	The site selection process aimed to avoid statutory designated sites and protected species and habitats where possible. Sites avoided through the site selection process include: - North Anglesey Marine / Gogledd Môn Forol Special Area of Conservation (SAC) - Liverpool Bay Special Protection Area (SPA) - West of Walney Marine Conservation Zone (MCZ) - West of Copeland MCZ.	Full details of the site selection process can be found in Volume 1 Chapter 4 Site Selection and Consideration of Alternatives of the Environmental Statement (document reference F1.4).
Step 2 – minimise	In the Morgan Array Area, designated features have been avoided and the indirect effects that could potentially impact designated sites, habitats and species have been reduced as far as possible. Examples of measures implemented to avoid potential impacts include: - Development and adherence to an Offshore Construction Method Statement (CMS) which includes a Cable Specification and Installation Plan (CSIP) which will include cable burial where possible and cable protection - Development and adherence to an Offshore CMS, which will include details of scour protection management, to be used around offshore structures and foundations to reduce scour as much as is practical - Development and adherence to an Offshore CMS which includes a CSIP which requires that material arising from drilling and/or sandwave clearance will be deposited in close proximity to the works and within the licenced disposal area applied for (which is the Morgan Array Area) - Development and adherence to an Offshore CMS, which will include details to minimise sandwave clearance volumes and will be included within the CSIP - Development and adherence to an Offshore Environmental Management Plan (EMP which includes a Marine Pollution Contingency Plan to minimise and manage the risk of marine pollution events - Development of and adherence to a MMMP that requires implementation of piling soft start and ramp-up measures - Development of and adherence to an Underwater sound management strategy that includes consideration of Noise Abatement Systems (NAS) as part of mitigation options (document reference J16) - The Applicant has committed to a minimum lower blade tip height (air draught) of 34 m above LAT and	Further details are available in Volume 1 Chapter 3 Project Description of the Environmental Statement , Volume 2, Chapter 1: Physical processes of the Environmental Statement (document reference F2.1), 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), Volume 2 and Chapter 5: Offshore ornithology of the Environmental Statement (document reference F2.5).

Step	How the Morgan Generation Assets considered the step	Further information
	- Development of and adherence to an Offshore EMP that will include measures to minimise disturbance to rafting birds and marine mammals from transiting vessels.	
Step 3 – mitigate / restore	As part of the Environmental Impact Assessment process mitigation has been proposed to reduce the potential adverse impacts of the Morgan Generation Assets.	Details of proposed mitigation can be found in the following documents: • Volume 2, Chapter 1: Physical processes of the Environmental Statement (ES) (document reference F2.1), • 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).
Step 4 – compensation and biodiversity benefit on site	The Applicant is open to considering (post consent) voluntary on site opportunities for marine biodiversity benefit and will continue to engage with stakeholders to identify possible opportunities.	The suite of potential marine biodiversity net gain measures are outlined in section 3.4 of this report.
Step 5 – biodiversity benefit off site	The Applicant is open to considering (post consent) voluntary off site opportunities (both within the marine environment and coastal (including intertidal) environment where there is connectivity) to provide biodiversity net gain and will continue to engage with stakeholders to identify and refine possible opportunities.	Further information on the suite of potential marine biodiversity net gain opportunities is provided in section 3.4 of this report.

3.4 Marine biodiversity benefit

3.4.1.1 NPS EN-1 states

"*Currently biodiversity net gain policy in England only applies to terrestrial and intertidal components of projects. Principles for Marine Net Gain are currently being rolled out by the Government, who will provide guidance in due course. There are provisions in the Environment Act 2021 to allow Marine Net Gain to be made mandatory for NSIPs in the future… …*

… Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible."

3.4.1.2 Offshore biodiversity enhancement is therefore recognised in policy, but it is not a statutory requirement. The Applicant has engaged with Natural England and other stakeholders on the topic of marine biodiversity benefit and potential biodiversity enhancements in coastal (including intertidal) environments where there is connectivity through the pre-application phase of the EIA (see section 2.3.1 in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (document reference F2.2) and Technical Engagement Plan Appendices Part 1 (A to D) (document reference E4.1).

3.4.1.3 Whilst there is no legislative requirement to deliver net benefits for biodiversity in the offshore environment the Applicant has kept a watching brief on emerging policy and guidance on this topic expected from the Defra and Natural England in the near future. The Applicant intends to explore the opportunities for marine and potential coastal biodiversity benefit measures listed below, and these opportunities will be discussed with Natural England and other stakeholders, where appropriate, as the Morgan Generation Assets progresses into the post consent phase. The Applicant also awaits future policy updates and guidance from Defra and Natural England which may influence opportunities for wider marine biodiversity benefit opportunities such as the MRF and the implementation of the marine habitat metric development.

3.4.1 Mitigation

3.4.1.1 A range of ecological mitigation measures will be put in place within the Morgan Array Area to mitigate the impacts of the construction, operation/maintenance and decommissioning of the Morgan Generation Assets (see the Mitigation and Monitoring Schedule (document reference J6)).

3.4.2 Additional marine biodiversity benefit

3.4.2.1 The Applicant has identified a number of potential opportunities within the Irish Sea which could deliver additional marine (and potential coastal) biodiversity benefit to the Morgan Generation Assets. These early opportunities are currently being explored for feasibility and suitability. Discussions are ongoing with stakeholders which are expected to continue into the Morgan Generation Assets DCO examination and post consent.

- The Morgan offshore ornithological surveys have enabled identification of connectivity of seabird species such as gulls with the coastal breeding areas at designated sites in the Irish Sea (see Volume 4, Annex 5.1: Offshore Ornithology Baseline Characterisation of the Environmental Statement). The Applicant is exploring opportunities to increase the productivity of breeding seabirds.
- Site specific benthic subtidal ecology surveys undertaken across the Morgan Array Area have been used to identify potential measures within the project design that could provide additional biodiversity benefit, if feasible and suitable to the area (see Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental Statement). For example:
  - Installing mattresses for cable protection designed to enhance biodiversity
  - Biodiversity enhancements which could be introduced as part of foundation design for Wind Turbine Generators and Offshore Substation Platforms within the Morgan Array Area, scour protection for the foundations, or cable protection to stabilise inter-array cables across the foundations. This may

include reef blocks or cubes, with specific designs/modifications which are appropriate to the surrounding environment, habitats and species

  - Opportunities to restore fish and shellfish habitats in the offshore environment.

- Existing marine habitat and species restoration projects (and coastal (including intertidal) projects with connectivity) in the Irish Sea are being explored.

3.4.2.2 The Morgan Generation Assets is aware that strategic biodiversity contributions-based funds are being considered by government organisations and stakeholders. Defra is in the process of developing the MRF through the Offshore Wind Environment Improvement Package (OWEIP) as detailed within the British Energy Security Strategy, to speed up development of offshore wind whilst protecting the marine environment (Defra, 2022). The MRF is primarily to help deliver strategic compensation measures under the Habitats Regulations. However, Defra is considering this fund for strategic marine net gain (Defra, 2022). The fund would be an efficient mechanism to deliver effective, aligned, strategic biodiversity net gain in the marine environment. This would enable efficient allocation of resources which could therefore provide potentially greater ecological benefits than measures delivered by a sole project alone, to enhance the resilience of marine and coastal ecosystems for the long term. At the time of writing, Morgan Generation Assets is aware there has been some delay, but levy and contributions-based mechanisms are still under consideration by Defra for marine net gain. In the future, Defra will consider whether it is appropriate for the MRF to be a delivery mechanism for strategic marine net gain. Further legislation would be needed to make this possible (Defra, 2023). The Applicant is continuing to keep up to speed on the development of the MRF for strategic marine net gain and will continue to engage with stakeholders on progress.

3.4.2.3 The Applicant will continue to explore these opportunities, where possible, including any suitable monitoring of the biodiversity benefit, as the project design matures, in collaboration with stakeholders post-consent.

4 Conclusion

4.1.1.1 Morgan Generation Assets has committed to delivering a net benefit for marine biodiversity.

4.1.1.2 This document presents the current legislative and policy background and emerging developments for marine net gain. The Statement outlines those potential measures and opportunities that will be explored and considered post-consent to deliver marine (and potentially coastal) biodiversity benefit.

4.1.1.3 The biodiversity benefit measures and opportunities outlined in this document will be considered and prepared further through engagement with relevant stakeholders post-consent.

4.2 References

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