

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Response to Hearing Action Points

Deadline: 1

Application Reference: EN010136

Document Number: MRCNS-J3303-RPS-10140

Document Reference: S_D1_4

3 October 2024

F01



Image of an offshore wind farm

MOORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
F01	Deadline 1	RPS	Morgan Offshore Wind Ltd	Morgan Offshore Wind Ltd	October 2024

Prepared by:

RPS

Prepared for:

Morgan Offshore Wind Ltd.

MOORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Contents

MORGAN OFFSHORE WIND PROJECT 1

1 APPLICANT’S RESPONSE TO HEARING ACTIONS POINTS 1

 1.1 Introduction 1

2 RESPONSES TO HEARING ACTION POINTS..... 3

 2.1 Applicant’s response to Hearing Action Points due at Deadline 1 3

Tables

Table 1.1: Hearing Action Points that will be addressed at Deadline 2 2

Table 2.1: Applicants response to Hearing Action Points due at Deadline 1. 3

MOORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Glossary

Term	Meaning
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 Offshore Wind Project.
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) applications for the Morgan Offshore Wind Project.
Expert Working Group (EWG)	Expert working groups set up with relevant stakeholders as part of the Evidence Plan process.
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.
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.
Maximum Design Scenario (MDS)	The scenario within the design envelope with the potential to result in the greatest impact on a particular topic receptor, and therefore the one that should be assessed for that topic receptor.
Morecambe Offshore Windfarm: Generation Assets	The Morecambe Offshore Windfarm is located in the east Irish Sea approximately 36.3 km (15.5 nm) from the northwest coast of England (when measured from MHWS). The anticipated nominal capacity of the Morecambe Offshore Windfarm is 480 MW.
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 Offshore Wind Project 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.
Morgan Offshore Wind Project: Generation Assets Scoping Report	The Morgan Scoping Report that was submitted to The Planning Inspectorate (on behalf of the Secretary of State) for the Morgan Offshore Project: Generation Assets.
Morgan and Morecambe Offshore Wind Farms: Transmission Assets	The transmission assets for the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm. This includes the Offshore Substation Platforms (OSPs), interconnector cables, Morgan offshore booster

MOORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Term	Meaning
	station, offshore export cables, landfall site, onshore export cables, onshore substations, 400kV grid connection cables and associated grid connection infrastructure such as circuit breaker infrastructure (as defined in the Morgan and Morecambe Offshore Wind Farms: Transmission Assets PEIR).
National Policy Statement (NPS)	The current national policy statements published by the Department for Energy Security & Net Zero in 2024.
Non-statutory consultee	Organisations that an applicant may choose to consult in relation to a project who are not designated in law but are likely to have an interest in the project.
The Northern Wales and Irish Sea Bidding Area	The Northern Wales and Irish Sea Bidding Area was one of four Bidding Areas identified by The Crown Estate through the Offshore Wind Leasing Round 4 process.
Offshore Substation Platform (OSP)	The offshore substation platforms located within the Morgan Array Area will transform the electricity generated by the wind turbines to a higher voltage allowing the power to be efficiently transmitted to shore.
Offshore Wind Leasing Round 4	The Crown Estate auction process which allocated developers preferred bidder status on areas of the seabed within Welsh and English waters and ends when the Agreements for Lease (AfLs) are signed.
Project Design Envelope (PDE)	The Project Design Envelope sets out the design assumptions and parameters from which the realistic MDSs are drawn for the Morgan Generation Assets Environmental Impact Assessment (EIA). This is also often referred to as the 'Rochdale Envelope' approach.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Secretary of State for Business, Energy and Industrial Strategy	The decision maker with regards to the application for development consent for the Morgan Offshore Wind Project.
Statutory consultee	Organisations that are required to be consulted by an applicant pursuant to the Planning Act 2008 in relation to an application for development consent. Not all consultees will be statutory consultees (see non-statutory consultee definition).
The Planning Inspectorate	The agency responsible for operating the planning process for NSIPs.
Wind turbines	The wind turbine generators, including the tower, nacelle and rotor.

MOORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Acronyms

Acronym	Description
CEA	cumulative effects assessment
CRNRA	Cumulative Regional Navigation Risk Assessment
DCO	Development Consent Order
DML	Deemed Marine Licences
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ExA	Examining Authority
GHG	Green house gas
HRA	Habitats Regulations Assessments
ISH1	Issue Specific Hearing 1
ICES	International Council for the Exploration of the Sea
MMO	Marine Management Organisation
MNEF	Marine Navigation Engagement Forum
OFTO	offshore transmission operator
OSP	offshore substation platforms
SNCB's	Statutory Nature conservation bodies
SFF	Scottish Fisherman's Federation
UWSMS	Underwater Sound Management Strategy

Units

Acronym	Description
GW	Gigawatt
km	Kilometres
km ²	Kilometres squared
kV	Kilovolt
MW	Megawatt
nm	Nautical miles

1 APPLICANT'S RESPONSE TO HEARING ACTIONS POINTS

1.1 Introduction

- 1.1.1.1 This document addresses the Hearing Action Points raised by the Examining Authority at the Preliminary Meeting and Issue Specific Hearing 1 at Aintree Racecourse on 10 September 2024.
- 1.1.1.2 The Hearing Action Points that will be addressed at Deadline 2 or Deadline 3 are listed in Table 1.1.
- 1.1.1.3 The Hearing Action Points for which responses were requested at Deadline 1 and have been addressed are in Table 2.1 and the accompanying annexes.
- 1.1.1.4 Following annexes are attached to this document:

S_D1_4.1	Annex 4.1 to Response to Hearing Action Point 10: Applicants response to the Meath County Council
S_D1_4.2	Annex 4.2 to Response to Hearing Action Point 11: Decision Letter of Triton Knoll Offshore Wind Farm Order 2013
S_D1_4.3	Annex 4.3 to Response to Hearing Action Point 12: Examining Authority's Recommendation Report of Triton Knoll Offshore Wind Farm Order 2013
S_D1_4.4	Annex 4.4 to Response to Hearing Action Point 14: Applicants response to seasonal pilling restrictions
S_D1_4.5	Annex 4.5 to Response to Hearing Action Point 15: Offshore Ornithology CEA and In-combination Gap-filling of Historical Projects Note
S_D1_4.6	Annex 4.6 to Response to Hearing Action Point 15: Displacement rates clarification note
S_D1_4.7	Annex 4.7 to Response to Hearing Action Point 15: Apportioning Sensitivity Analysis
S_D1_4.8	Annex 4.8 to Response to Hearing Action Point 15: Great Orme Head SSSI Clarification Note
S_D1_4.9	Annex 4.9 to Response to Hearing Action Point 22: Applicants response to ICES guidance and SFF
S_D1_4.10	Annex 4.10 to response to Hearing Action Point: Applicants response to Scottish Fishermen's Federation oral representation at ISH1
S_D1_4.11	Annex 4.11 to Response to Hearing Action Point 25: Applicants response to wake loss

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Table 1.1: Hearing Action Points that will be addressed at Deadline 2

Ref.	No.	Directed to	Action	Deadline
HAP_ISH1_13	13	Applicant	Cumulative Effects Assessment Submit Morecambe Offshore Wind Farm Generation Assets cumulative effects sensitivity assessment.	D2

2 RESPONSES TO HEARING ACTION POINTS

2.1 Applicant's response to Hearing Action Points due at Deadline 1

Table 2.1: Applicants response to Hearing Action Points due at Deadline 1.

Ref.	No.	Directed to	Action	Applicant response
HAP_ISH 1_1	1	Applicant	<p>Work Numbers</p> <p>Justify why draft Development Consent Order (DCO) Schedule 1, Part 1 Work Numbers 2 and 3 are separate rather than combined.</p>	<p>The Applicant divided the Works Numbers in this manner to accommodate any onward transfer of the offshore substation platforms ("OSPs") and interconnector cables to an offshore transmission operator ("OFTO") if required in due course. A final decision on whether one or all of the OSPs and associated interconnector cables will be transferred to an OFTO as part of the offshore generation station's transmission assets or whether those elements will remain part of the project's generation assets alongside the wind turbine generators and inter-array cables will not be taken until a later date, most likely after construction of the project.</p> <p>The Applicant therefore identified separate Works Nos. 2 and 3 to avoid the potential for a work to be split which would then have necessitated a split of either or both of deemed marine licence 1 (within schedule 3 of the draft DCO) or deemed marine licence 2 (within schedule 4 of the draft DCO). The Applicant is aware that the MMO has serious concerns about the splitting of marine licences and has sought to avoid this by the approach adopted in the draft DCO.</p>
HAP_ISH 1_2	2	Applicant	<p>Design Parameters Amend the Design Parameters in Table 1 of draft DCO Schedule 2 (2), and in Tables 2 and 3 of Condition 10 in Schedules 3 and 4 to confirm minimum dimensions between structures to be 1400m from the centre of wind turbine structures. Those amended tables must also include a new maximum rotor swept area parameter.</p>	<p>The Applicant has submitted an updated draft DCO (document reference S_D1_8) at Deadline 1.</p>
HAP_ISH 1_3	3	Applicant	<p>Explanatory Memorandum</p> <p>Provide further justification for each individual provision with the draft DCO and draft Deemed Marine Licences (DML) within an updated Explanatory Memorandum, noting that precedent is not sufficient explanation for why</p>	<p>The Applicant has submitted an updated Explanatory Memorandum (document reference S_D1_9) at Deadline 1.</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
			certain provisions/wording within those provisions are necessary for the Morgan Offshore Wind Project: Generation Assets.	
HAP_ISH 1_4	4	Applicant	<p>7-Year Commencement Expiry Date 1</p> <p>Within an updated Explanatory Memorandum the Applicant must provide application-specific justification for the 7-year commencement period backstop [in draft DCO Schedule 2, Requirement 1], explaining how this aligns with the National Policy position that offshore wind is critical national priority infrastructure, and how it aligns with the timeframes cited within the Environmental Statement for commencement of construction (2026) and operation (2030).</p>	The Applicant has submitted an updated Explanatory Memorandum (document reference S_D1_9) at Deadline 1.
HAP_ISH 1_5	5	Any IP	<p>7-Year Commencement Expiry Date 2</p> <p>Provide comments on the appropriateness of a 7-year commencement period in draft DCO Schedule 2, Requirement 1.</p>	Question to Interested Parties – no response required from the Applicant.
HAP_ISH 1_6	6	Applicant	<p>Definition of Maintain</p> <p>Provide justification for the second part of the definition of “maintain” within the draft DCO/draft DMLs, which states “provided that such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement”. Explain why the definition does not simply list the type of operations that would constitute maintenance and follow that with a simpler phrase, such as “to the extent assessed in the environmental statement”? (Underlining is ExA’s emphasis)</p>	<p>The Applicant considers that the wording for the definition of “maintain” in each deemed marine licence within schedules 3 and 4 of the draft DCO is justified. The purpose of the EIA Regulations is to identify the likely significant environmental effects that will arise from a project. That facilitates the relevant decision maker making an informed decision on the likely effects of the project before they grant or refuse consent. The detail in an Environmental Statement is not intended to be wholly prescriptive. In undertaking an EIA, a developer has to make certain assumptions about how the project will be undertaken, particularly in respect of the operation and maintenance phase. Key parameters that underpin the assessment will then be included in the terms of the consent granted.</p> <p>In respect of operation and maintenance activities, the use of the word “materially” reflects that the detail of potential maintenance activities included in an Environmental Statement are based on assumptions. The word “materially” gives a limited degree of flexibility, but would not authorise any activities that would give rise to new or different significant effects. That would clearly be outwith the scope of the deemed marine licence. The Applicant therefore considers the existing definition to be appropriate. It is well</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>precedented in DCOs for offshore wind farms, including East Anglia One North Offshore Wind Farm Order 2022, the East Anglia Two Offshore Wind Farm Order 2022, the Norfolk Boreas Offshore Wind Farm Order 2021, the Norfolk Vanguard Offshore Wind Farm Order 2022</p> <p>The Applicant notes that the authorised maintenance activities are subject to condition 13 of each deemed marine licence. Sub-paragraph (2) of that condition sets out a non-exclusive list of activities that will constitute maintenance works. Sub-paragraph (3) requires an operations and maintenance plan substantially in accordance with the outline offshore operations and maintenance plan (APP-079) to be approved by the MMO prior to commencement of development. That management plan needs to be reviewed and resubmitted every three years during operation. Sub-paragraph (4) requires operation and maintenance activities to be carried out in accordance with the approved plan.</p> <p>The drafting of the definition of “maintain” is therefore subject to the provisions of condition 13, which gives considerable control to the MMO over how maintenance activities are undertaken in practice. The Applicant considers that this provides checks and balances to the limited flexibility that the definition itself contains.</p>
HAP_ISH 1_7	7	Applicant	<p>Underwater Sound Management Strategy</p> <p>Clarify how the Underwater Sound Management Strategy (UWSMS) in draft DCO Schedules 3 & 4, Condition 22 applies to fish and shellfish as well as marine mammal ecology.</p>	<p>The Underwater Sound Management Strategy (UWSMS) (APP-068) is a consent compliance document that provides a strategy to reduce the magnitude of impacts from elevated underwater sound from the Morgan Generation Assets and consequently contributes to reducing the project’s contribution to potential cumulative impacts on sensitive marine mammal and fish receptors. The overarching aim of the UWSMS is to reduce the magnitude to a level such that any residual effects can be concluded as a non-significant in the context of EIA.</p> <p>Condition 22 of the draft DCO prevents any piling activities or detonation of unexploded ordinance from occurring until an underwater sound management strategy, in accordance with the outline UWSMS (APP-068), has been submitted to and approved by the MMO. The control within Condition 22 is therefore linked to the activity that produces noise, rather than having any specific species links.</p> <p>The UWSMS applies to both sensitive marine mammal and fish species as set out in Section 1.2 of the document (APP-068). In the Environmental Statement, herring was identified as potentially being significantly affected by elevated underwater sound during piling from the Morgan Generation assets alone, and</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>both herring and cod could be potentially significantly affected by elevated underwater sound cumulatively with other projects piling at the same time.</p> <p>The fact that the UWSMS will also apply to fish species is reflected throughout the Outline UWSMS (APP-068). See, for example, sections 1.5.3, 1.6.1, 1.7.2, 1.8.2 that all include specific consideration of mitigation measures applicable to sensitive fish receptors.</p> <p>Shellfish are considered of lower sensitivity to underwater sound effects, and the assessment undertaken for shellfish species in relation to the impacts of underwater sound predicted no significant effects as a result of pile-driving or other sound generating activities (see paragraph 3.9.3.73 to 3.9.3.83 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021) for shellfish sensitivity information). Shellfish are therefore not specifically considered within the Outline UWSMS (APP-068) as specific mitigation measures are not considered required.</p> <p>The Final UWSMS will be developed post-consent based on further refined project design information and programmes for the projects that could have a potential cumulative effect. An Outline UWSMS has been submitted with the Application to provide an overview of the information that will be included (APP-068).</p> <p>The Final UWSMS will be produced in consultation with the licensing authority and statutory nature conservation bodies (SNCBs) to agree, in detail, the necessary mitigation measures that will be implemented prior to commencement of and during offshore construction to manage effects to sensitive fish and marine mammal species (specific measures will be investigated to mitigate impacts to each defined receptor). Production of the Final UWSMS is secured as a condition within Schedules 3 and 4 of the draft DCO (AS-003).</p>
HAP_ISH 1_8	8	Applicant	<p>Commence or Take Place</p> <p>Review and clarify why Conditions 22 and 23 of the draft DMLs use different terminology to trigger the submission of certain documents to the Marine Management Organisation (MMO) for approval. Specifically condition 22(1) says “No piling activities.... ‘must commence’ until...”, while condition 23(1) says “No</p>	<p>The Applicant has submitted an updated draft DCO (document reference S_D1_8) at Deadline 1, with an update to condition 22 to ensure consistency.</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
			removal... 'can take place' until...". (Underlining is ExA's emphasis)	
HAP_ISH 1_9	9	Applicant	Draft DCO Article 7(4) Consider and respond on the desirability of a tailpiece to Article 7(4) that requires the Secretary of State to have regard to the advice of the MMO, rather than just the requirement to consult the MMO.	The Applicant considers that it is implicit in the requirement to consult with the MMO that the Secretary of State would have regard to the MMO's comments. The Applicant has reviewed the drafting in other DCOs and considers that it is not standard practice to have a separate provision that directs the Secretary of State to have regard to consultation responses. If considered necessary the Secretary of State is able to add this wording into the article as part of the final Order.
HAP_ISH 1_10	10	Applicant	Transboundary Matters 1 Provide a response to the Meath County Council submissions dated 10 September 2024, made in response to the second transboundary screening dated 3 July 2024.	The Applicant has submitted a response to the Meath County Council submission (document reference S_D1_4.1).
HAP_ISH 1_11	11	Applicant	Triton Knoll 1 Submit a copy of the full decision letter for the Triton Knoll Offshore Wind Farm Order 2013 and the Examining Authority's recommendation report, with reference to the relevant sections which relate to the matter of stranded assets as raised in Natural England's Relevant Representation [RR-026].	A copy of the Decision Letter and Recommendation Report are annexed to this document (S_D1_4.2 and S_D1_4.3)
HAP_ISH 1_12	12	Applicant	Triton Knoll 2 Provide a summary of the relevance of Triton Knoll Offshore Wind Farm Order 2013 and the separate grid connection at the Triton Knoll Electrical System Order 2016. This should explain how the projects differ from the Proposed Development, including in terms of timescales involved and the policy at that time.	The Applicant referred to the Triton Knoll Offshore Wind Farm Order 2013 within its response (PD1-016) to specific representations made by Natural England relating to the cumulative effects assessment and potential for stranded assets. The Applicant made reference to the Triton Knoll project, as this was referenced by Natural England within its relevant representation (RR-026). Natural England referenced its advice on the Triton Knoll Wind Farm Order 2013 as being consistent with its position on the application for the Morgan Generation Assets. However, in its representation, Natural England omitted important contextual information about how its advice was considered by the Secretary of State within the final decision. It is for that reason that the Applicant referenced the terms of the decision letter for the Triton Knoll Offshore Wind Farm Order 2013.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>The Applicant considers that there are a number of points that can be taken from the Triton Knoll Offshore Wind Farm Order 2013 decision, including:</p> <ul style="list-style-type: none"> • that there is precedent for the array area of a wind farm being consented separately to the transmission infrastructure; • That the Secretary of State accepted that a robust EIA and HRA could be undertaken for both aspects of the wider project; • That a Grampian-style requirement linking the two consents was unnecessary. <p>The Applicant does not seek to rely on the decision for the Triton Knoll project more broadly. For the reasons set out within its response (PD1-016), the Applicant considers that there is comprehensive policy support for the consenting approach taken by the Applicant, and that the methodology of the cumulative effects assessment that has been undertaken is robust. The Applicant does not consider there is any risk of 'stranded assets'.</p>
HAP_ISH 1_13	13	Applicant	Cumulative Effects Assessment Submit Morecambe Offshore Wind Farm Generation Assets cumulative effects sensitivity assessment.	The Applicant will submit this for Deadline 2.
HAP_ISH 1_14	14	Applicant	Seasonal Piling Restrictions Provide clarification on the impact that a seasonal piling restriction (to protect herring and cod spawning) would have on the construction timeframe of the array.	The Applicant has submitted a response S_D1_4.4_Morgan Gen_Response to Hearing Action Point 14_ Applicant's response to seasonal piling restrictions at Deadline 1.
HAP_ISH 1_15	15	Applicant	Ornithology Provide the ornithology clarification notes and technical note referred to in Procedural Deadline response to Relevant Representations [PD1-017], and provide a response as to why such additional information is not to form an update to the Environmental Statement (ES).	The Applicant has submitted the ornithology clarification notes and technical note referred to in the Procedural Deadline response to Relevant Representations (PD1-017) at Deadline 1 (references: S_D1_4.5, S_D1_4.6, S_D1_4.7 and S_D1_4.8). Please note the abundance data note is being finalised and will be submitted at Deadline 2. The Applicant can confirm that these ornithology notes are clarificatory to further facilitate the SNCB's understanding of the assessments in the ES and Information to Support the Appropriate Assessment (ISAA) (Volume 4, Annex 5.1: Offshore ornithology baseline characterisation (APP-053), Volume 2, Chapter 5: Offshore ornithology (APP-023) and HRA Stage 2 ISAA Part Three: Special Protection Areas and Ramsar sites Assessments (APP-098)), therefore the Environmental Statement (ES) chapters themselves do not need to be updated

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>to account for them. It is appropriate for these ornithology notes to sit alongside the DCO application as Examination documents. The assessments submitted with the DCO application are robust, precautionary, and provided sufficient detail to conclude no significant effects within the ES and no AEOI beyond reasonable scientific doubt for the purposes of the Habitats Regulations Assessments (HRAs) undertaken for the Morgan Generation Assets.</p> <p>Various aspects of Volume 4, Annex 5.1: Offshore ornithology baseline characterisation (APP-053) have been updated. This includes previously identified Errata (PD1-003) and raw data presented in Appendix A and D and behavioural data in Section 1.5: Species accounts to account for a duplication of raw data associated with the December 2022 survey. The duplication of these data is restricted to the Volume 4, Annex 5.1: Offshore ornithology baseline characterisation (APP-053) and does not affect other aspects of the application (e.g. abundance metric estimation, collision risk modelling or displacement analyses).</p>
HAP_ISH 1_16	16	Applicant	<p>Errata Sheet</p> <p>Provide a written justification for the submission of an Errata Sheet [PD1-003] as opposed to tracked changed updates to the ES or other submitted documents. Explain how any further errata or updates will be submitted during the Examination.</p>	<p>The Applicant submitted an errata sheet at the Procedural Deadline (PD1-003) and has submitted an update to this errata sheet (S_D1_7_Morgan Gen_Applicant's Errata Sheet_F02) to capture minor errors raised by the Examining Authority at ISH1.</p> <p>The purpose of the errata sheet is to address any minor errors that have been picked up within the documentation submitted at Application. Errors considered to be minor are errors such as typos or minor edits which would not affect the assessment outcomes.</p> <p>The errata sheet would be certified as forming part of the Environmental Statement, in accordance with Schedule 5 of the development consent order (AS-003). The Applicant does not intend to produce updated versions of Environmental Statement chapters with these errors corrected, which would produce considerably more documentation into the Examination.</p> <p>The errata sheet will only be updated and submitted for future deadlines in the Examination if there are any further minor errors raised (either by the Applicant, IPs or the ExA).</p>
HAP_ISH 1_17	17	Applicant	<p>Marine Navigation Engagement Forum</p> <p>Consider and submit a briefing note on how long in the post-consent and post-construction period the Marine Navigation Engagement</p>	<p>Marine Navigation Engagement Forum</p> <p>The Applicant has committed to continued engagement of the MNEF, post consent in Table 7.17: Measures adopted as part of the Morgan Generation</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
			<p>Forum is to be sustained and how that should be secured.</p> <p>Whilst not a specifically identified within the ExA's Action Points from ISH1, the Applicant took note (during ISH1) of the requirement to respond on the role of the Cumulative Regional Navigation Risk Assessment over time. As this has some linkage to the MNEF, the Applicant has set out its post-hearing response on this matter here.</p>	<p>Assets of the Shipping and navigation chapter (APP-025) and in J6 Mitigation and Monitoring Schedule reference number 7.20 in Table 1.7 (APP-076).</p> <p>The MNEF was established by the Applicant in 2021 as a forum for effective communication with shipping and navigation stakeholders on the Morgan Offshore Wind Project: Generation Assets. There is no specific requirement for an open forum similar to the MNEF within Marine Guidance Note 654 or other primary guidance. The forum is, therefore, not a requirement under guidance post-consent or post-construction. Nor is such a forum typical on other constructed or consented offshore wind farms.</p> <p>Invites to the MNEF meetings pre-application included a Terms of Reference (ToR), which is summarised in the Technical Engagement Plan (APP-094). The purpose of these meetings is <i>"to provide a platform for the exchange of information, knowledge and experience that will enable marine developers, and relevant shipping and navigation (S&N) stakeholders to coexist in the marine environment. Specifically, the MNEF will focus on matters relating to: Risk to safety of marine operations and navigation, and impact on marine operations and navigation. The MNEF will aim to ensure that the views and needs of relevant S&N stakeholders and marine developers are discussed and considered during the pre-construction, construction, operation, pre-decommissioning and decommissioning phases of the Projects."</i></p> <p>It is anticipated that the ToR for post-consent meetings would be similar and the meetings would continue through pre-construction, construction, and operations and maintenance phases. Membership of the MNEF is documented in Table 1.14 in the Technical Engagement Plan (APP-094) and is open to all users of the eastern Irish Sea. Therefore, the membership could change to reflect new marine operators and interested parties in the eastern Irish Sea. It is anticipated that marine contractors operating for the Morgan Generation Assets would also attend.</p> <p>The frequency of MNEF meetings post-consent is not yet determined but are anticipated to change in frequency through the Morgan Generation Assets lifecycle, meeting more regularly through construction and less frequently during operations and maintenance, reflective of the relative activities.</p> <p>The Applicant acknowledges the importance of this commitment to ensure that the appropriate authorities and stakeholders (including existing operational wind energy developers) are informed of works being carried out in waters adjacent to the Morgan Array Area (and other Round 4 projects) and for general project updates.</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>The Applicant anticipates that the frequency of MNEF meetings pre-construction will be agreed with the group at the first meeting post-consent when the Applicant has a better understanding of the pre-construction programme and programme for preparation of key pre-commencement documents, such as the Vessel Traffic Management Plan.</p> <p>The MNEF will facilitate the development and finalisation of the Vessel Traffic Management Plan (secured within the deemed Marine Licences within the draft DCO and in accordance with the Outline Vessel Traffic Management Plan APP-071) to safely manage Morgan Offshore Wind Project construction and operations and maintenance activities and reduce adverse impacts on other marine users, which would include other offshore wind farm operators.</p> <p>Cumulative Regional Navigation Risk Assessment</p> <p>The Cumulative Regional Navigation Risk Assessment (CRNRA) (APP-060) was instigated following pre-PEIR engagement with shipping and navigation stakeholders, as described in Table 7.4 of the Shipping and Navigation Assessment (APP-025). Stakeholders made clear that they were concerned primarily about the cumulative impact and therefore wished to see a cumulative study, using a consistent approach, rather than independent NRAs per developer. The Applicant, in collaboration with the Mona Offshore Wind Project, Morecambe Generation Assets and Morgan and Morecambe Transmission Assets undertook such a study, as described within APP-060.</p> <p>The CRNRA for the Application of the Morgan Generation Assets, was based on the information available in the public domain, and whilst there was an iterative update following the PEIR and the amendments to the design of the Projects considered within the CRNRA, the Applicant does not consider there is requirement to further update the CRNRA beyond submission. There have been no further substantial changes to the collaborative projects since the application submission.</p> <p>The Applicant is aware that Moir Vannin Offshore Wind Farm Limited provided consultation materials on their website on the 15 July 2024. This included a minor amendment to the Offshore Electrical Infrastructure Study Area but no change to the array area. In addition, a two-page shipping and navigation note was provided which summarised the vessel traffic surveys undertaken. The consultation material made available included early stage environmental information, however this did not include any assessment of potential environmental effects. As such, the Applicant is not able to progress the CEA considering Moir Vannin further at this stage.</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				<p>As no change was proposed to the array area and no further assessment was provided, the Applicant does not believe that any update to the CRNRA is necessary. Moir Vannin will be undertaking their own NRA process as their project design and consenting process evolves. The Applicant expects that the application for the Moir Vannin Offshore Wind Farm will contain a navigation risk assessment, including an assessment of the cumulative effects with the Irish Sea Round 4 projects, when it is submitted, as reported on their website as in early 2025.</p> <p>Should any new projects or updates come forward during the Examination of the Morgan Generation Assets, the effect of such changes will be assessed as part of a broader cumulative effects assessment (CEA) sensitivity analysis which will be submitted into the Examination. This analysis will supplement the CEA undertaken for the Morgan Generation Assets Application within the topic specific chapters in Volume 2 of the Environmental Statement (APP-013 to APP-027) to reflect any new projects not previously considered and changes that may affect the outcome of the application CEA.</p> <p>Post-consent, the MNEF can facilitate engagement between the developers and the MCA, which would include cumulative matters, or other relevant forums, such as the Nautical and Offshore Renewables Energy Liaison Group, which is chaired by the MCA.</p>
HAP_ISH 1_18	18	Applicant	<p>Corrections 1</p> <p>Correct Heysham to Douglas Steam Packet ferry crossing time in ES Chapter 7 [APP-025 paragraph 7.9.4.23] (currently stated as two hour 45 minutes).</p>	<p>This typographic error occurs in paragraph 7.9.4.23 of the ES Chapter (APP-025). This has been reflected and updated in the Errata document (S_D1_7_Morgan Gen_Applicant's Errata Sheet_F02).</p>
HAP_ISH 1_19	19	Applicant	<p>Corrections 2</p> <p>Review the wording of paragraph 1.4.1.2 of the Outline Vessel Traffic Management Plan (VTMP), which currently reads "There is no formal guidance on the development and content that should be included within a VTMP. In the absence of formal guidance, this plan is based which provides ..." [APP-071].</p>	<p>This wording has been corrected in the Errata document (S_D1_7_Morgan Gen_Applicant's Errata Sheet_F02).</p>
HAP_ISH 1_20	20	Applicant	<p>Carbon Emissions (Commercial Vessels)</p>	<p>The Shipping and Navigation assessment (APP-025) recognises impacts to commercial operators including strategic routes and lifeline ferries (Section 7.9.2 and Section 7.11.2). This includes impacts to those operators associated</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
			<p>Provide a response to whether an additional assessment needs to be made of increased carbon emissions from vessels consequent on making longer sea passages to deviate around the Proposed Development alone and cumulatively with other projects. Also comment on whether there is any legal precedent that might suggest a vulnerability to legal challenge on this matter.</p>	<p>with deviations around the Morgan Array Area, and the associated costs in terms of fuel or compliance with relevant environmental standards.</p> <p>As detailed in Volume 4, Annex 12.1: Technical Greenhouse gas assessment of the Environmental Statement (APP-046), the deviation of ferry and cargo routes would result in 678.17 tCO₂e per annum. This figure does not account for any decarbonisation in vessel fuel emissions or fluctuations in route crossings. The emissions associated with route deviation have been accounted for within the assessment for operational effects. The Applicant included these emissions within the main assessment as there is an indirect effect associated with the Morgan Generation Assets. This has then been assessed in addition to the avoided emissions and other operations and maintenance fuel use. As such, no additional assessment was required as part of the cumulative assessment.</p> <p>The Applicant notes that development consent had been granted to other offshore wind farms where increased emissions of deviated vessels has not been assessed as an impact (see for example Sheringham and Dudgeon Extension EN10109, Hornsea Four EN010098 and Awel y Mor EN010112).</p> <p>The Applicant does not consider there is any legal precedent that would suggest a vulnerability to legal challenge on this matter, or in respect of the scope of the Technical Greenhouse gas assessment (APP-046) more generally. The requirements of the EIA Regulations are for the Environmental Statement to report on the likely significant effects of a development, which are considered within Volume 2, Chapter 12 Climate change [APP-016].</p> <p>The Applicant has undertaken the assessment in accordance with the leading EIA guidance set out in 'Assessing Greenhouse Gas Emissions and Evaluating their Significance' (IEMA, 2022). Page 21 of that guidance sets out how cumulative GHG emissions should be assessed within an EIA. To ensure a precautionary approach, reflecting that all global GHG sources are relevant to the effect on climate change, it recommends defining the receptor (the atmospheric concentration of GHGs) as being of 'high' sensitivity to further emissions. The guidance goes on to state: <i>"Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other."</i></p> <p>This is the approach that has been followed by the Applicant in Environmental Statement - Volume 2, Chapter 12 Climate change (APP-016), which is robust and precautionary in assessing the potential contribution of the Proposed</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
HAP_ISH 1_21	21	Applicant	<p>Transboundary Matters 2</p> <p>Provide a briefing note on the equivalent to the Maritime and Coastguard Agency and United Kingdom Chamber of Shipping with responsibility in the Republic of Ireland Exclusive Economic Zone. Clarify if and how they have been engaged to date in relation to any transboundary concerns regarding shipping and navigation.</p>	<p>Development, alone and cumulatively, to greenhouse gas emissions and climate change.</p> <p>The Applicant notes that the MCA, as delegated by the Department for Transport, are responsible for the safety of navigation, pollution response and search and rescue within the United Kingdom's Exclusive Economic Zone (EEZ). These responsibilities are set out through the UN's Convention of the Law of the Sea (1982), the International Maritime Organisation's Safety of Life at Sea Convention (1974) and the Merchant Shipping (Safety of Navigation) Regulations 2020 amongst others. As the Morgan Generation Assets lies within the UK EEZ, the Applicant has engaged extensively with the MCA as described within Table 7.4 of Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (APP-025).</p> <p>The Applicant notes that the nearest international boundary to the Morgan Generation Assets is the Republic of Ireland, located at least 40 nm from the Morgan Array Area. The Marine Safety Office is the equivalent responsible authority for navigational safety within the Republic of Ireland's EEZ. As the Morgan Array Area lies fully within the UK EEZ, and there is significant distance to the Republic of Ireland's EEZ with no credible impact pathway, the Applicant does not believe that specific consultation with the Marine Safety Office is necessary as they have no jurisdiction or responsibility for safety of navigation in this region. Furthermore, the Applicant does not believe that the construction, operations and maintenance or decommissioning of the Morgan Generation Assets would appreciably change the risk of navigational safety within the waters of the Republic of Ireland.</p> <p>The Applicant has also engaged extensively with the UK Chamber of Shipping throughout the assessment, including attendance at hazard workshops and navigation simulations (Table 7.4 of Volume 2, Chapter 7: Shipping and navigation of the Environmental Statement (APP-025)). The UK Chamber of Shipping is the trade association and voice of the UK shipping industry and includes as its members a number of the affected ferry operators. The International Chamber of Shipping which represents the world's national shipowner associations and therefore other national interests was also invited to attend the Marine Navigation Engagement Forum (MNEF).</p> <p>Dublin Port and the Irish Chamber of Shipping were invited to attend the MNEF. Dublin Port either declined the invitation or opted to be included in communications only and the Irish Chamber of Shipping only attended the first meeting 10 November 2021.</p>

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
				Section 7.12 of the Shipping and Navigation chapter (APP-025) states that the Morgan Generation Assets could impact upon vessels which are either internationally owned or operating between ports in different states, including the Republic of Ireland. These have been assessed throughout the NRA (APP-060) and consultation has been undertaken with regular runners operating between the UK and Republic of Ireland such as Stena Line and CLdN (as described in Table 7.4 of the Shipping and Navigation chapter APP-025). The Applicant notes that this approach is consistent with other offshore wind projects located adjacent to international boundaries.
HAP_ISH 1_22	22	Applicant	<p>International Council for the Exploration of the Sea (ICES) guidance 1</p> <p>Respond to the Scottish Fishermen's Federation questions at the hearing relating to the ICES guidance for fisheries survey and with regard to herring spawning and nursery grounds.</p>	The Applicant has responded to the Scottish Fishermen's Federation questions in S_D1_4.9_Morgan Gen_HAP_ISH1_22_ICES guidance and SFF response. Further the applicant provided an additional annex with regard to SFFs oral representation at ISH1 (S_D1_4.10).
HAP_ISH 1_23	23	Scottish Fishermen's Federation	<p>ICES guidance 2</p> <p>Review the recording of the hearing for the Applicant's oral submission about the environmental impact assessments relating to Fisheries (ES Chapter 6, APP-024] and Fish & Shellfish Ecology [ES Chapter 3, APP-021], particularly in relation to application of ICES guidance. Provide a written response with comments (this can be combined with your Written Representations at D1).</p>	Question to Scottish Fishermen's Federation – no response required from Applicant.
HAP_ISH 1_24	24	Applicant	<p>Corrections 3</p> <p>Add missing data sources to figures in ES Annex 6.1 [APP-059].</p>	This wording was corrected in the Errata document submitted at the Procedural Deadline (PD1-003).
HAP_ISH 1_25	25	Applicant	<p>Wake Effects 1</p> <p>Respond to the Orsted IP's comments at the hearing in relation to wake effects, the policy support for undertaking a wake effects assessment, and the availability of the data to feed into such an assessment.</p>	The Applicant has responded to the Orsted IPs comments in S_D1_4.11 Morgan Gen_Response to Hearing Action Point 25_ Applicants response to wake loss.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Ref.	No.	Directed to	Action	Applicant response
HAP_ISH 1_26	26	Orsted IPs	Wake Effects 2 Explain the suggested content of/approach to/scope of a potential Wake Loss Assessment.	Question to Orsted IPs – no response required from Applicant.
HAP_ISH 1_27	27	Applicant	Transmission Assets Provide estimated timing for Morgan & Morecambe Offshore Wind Farms Transmission Assets DCO application submission.	The Applicant has included this information within the Report on Interrelationships submitted for Deadline 1 (S_D1_5).