

# MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

## Annex 3.1 to the Applicant's response to Written Representations from the Marine Management Organisation at Deadline 2

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Image of an offshore wind farm

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

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## Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) 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 and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.

## Acronyms

Acronym	Description
DCO	Development Consent Order
EIA	Environmental Impact Assessment
HRA	Habitats Regulations Assessment
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Plan
offshore EMP	offshore Environmental Management Plan
OTNR	Offshore Transmission Network Review
SAC	Special Areas of Conservation
SPA	Special Protected Area
WR	Written Representation

# 1 ANNEX 3.1 TO THE APPLICANT’S RESPONSE TO WRITTEN REPRESENTATIONS FROM THE MARINE MANAGEMENT ORGANISATION AT DEADLINE 2

## 1.1 Introduction

1.1.1.1 This document has been prepared in response to the Written Representations (WRs) from the Marine Management Organisation (MMO) (REP1-048) submitted to the Examining Authority at Deadline 1. The WR (REP1-048.15) is as follows:

*MMO’s Deadline 1 response*

*The MMO maintains the position that a document showing compliance with all plans is submitted as even those that are not applicable need to be revised to show that each policy has been assessed.*

*The MMO has reviewed the Planning Statement (J2) and has identified that the following policies within the North West Offshore Marine Plan Policy have not been assessed for compliance:*

*NW-ACC-1, NW-AGG-3, NW-AQ-2, NW-CAB-2, NW-CC-1, NW-CCUS-1, NW-CCUS-2, NW-CCUS-3, NW-DD-3, NW-DEF-1, NW-FISH-1, NW-INNS-2, NW-ML-1, NW-ML-2, NW-MPA-2, NW-MPA-3, NW-MPA-4, NW-OG-2, NW-PS-4, NW-UWN-1.*

## 1.2 Response

1.2.1.1 Table 1.1 sets out the specific policies identified by the MMO in their WR. Key provisions are set out along with details as to how these have been addressed within the Morgan Generation Assets application. For completeness, all other policies within the North West Inshore and North West Offshore Marine Plan, and how they have been considered in the Morgan Generation Assets application, have been taken from the topic-specific chapters of the Environmental Statement, to ensure there is one point of reference (APP-013 to APP-021, AS-010 and APP-023 to APP-027).

**Table 1.1: North West Inshore and North West Offshore Marine Plan policies and how they have been considered.**

Policy	Key Provisions	How and where considered in the Environmental Statement
<b>Physical processes (Volume 2, Chapter 1: Physical processes (APP-013))</b>		
NW-CAB-1	Preference should be given to proposals for cable installation where the method of protection is burial. Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. Where burial or protection measures are not appropriate, proposals should state the case for proceeding without those measures.	Details of the project design criteria are detailed in Volume 1 Chapter 3: Project description of the Environmental Statement (APP-010) To minimise potential impact from the cables and removal of cables a commitment to bury cables where possible has been made as outlined in Table 1.14 which details measures that will be adopted within the context of the project (Volume 2, Chapter 1: Physical processes (APP-013)). The Morgan Generation Assets project therefore accords with policy NW-CAB-1.
NW-MPA-1	Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid	Designated sites and features of importance within the physical processes study area have been identified in section 1.5.2 (Volume 2, Chapter 1: Physical processes (APP-013)).

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Policy	Key Provisions	How and where considered in the Environmental Statement
	<p>b) minimise</p> <p>c) mitigate – adverse impacts, with due regard given to statutory advice on an ecologically coherent network</p>	<p>Potential impacts have also been identified and the significance of the effects on physical processes receptors has been assessed in section 1.9 (Volume 2, Chapter 1: Physical processes (APP-013)). The effects of the proposed project on the MPA are also assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)).</p> <p>During the design process a range of parameters have been considered and following the mitigation hierarchy to avoid, minimise and mitigate potential impacts measures will be adopted within the context of the project as detailed in Table 1.14 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-1.</p>
NW-MPA-4	<p>Proposals that may have significant adverse impacts on designated geodiversity must demonstrate that they will, in order of preference:</p> <p>a) avoid</p> <p>b) minimise</p> <p>c) mitigate – adverse impacts so they are no longer significant.</p>	<p>Designated sites and features of importance within the physical processes study area have been identified in section 1.5.2 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>Potential impacts have also been identified and the significance of the effects on physical processes receptors has been assessed in section 1.9 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>During the design process a range of parameters have been considered and following the mitigation hierarchy to avoid, minimise and mitigate potential impacts measures will be adopted within the context of the project as detailed in Table 1.14 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-4.</p>
NW-BIO-1	<p>Proposals that may have significant adverse impacts on the distribution of priority habitats and priority species must demonstrate that they will, in order of preference:</p> <p>a) avoid</p> <p>b) minimise</p> <p>c) mitigate – adverse impacts so they are no longer significant</p> <p>d) compensate for significant adverse impacts that cannot be mitigated.</p>	<p>Sites identified as Habitats Directive Annex I habitats within the physical processes study area have been identified in section 1.5.2 (Volume 2, Chapter 1: Physical processes (APP-013)). Additionally, the effects of the proposed project are assessed in Volume 2, Chapter 2: Benthic subtidal ecology of the Environmental Statement (APP-020), Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (APP-021) and Volume 2, Chapter 4: Marine mammals of the Environmental Statement (AS-010). Further information is also provided in the Information to support an appropriate assessment (ISAA) (APP-096, APP-097, APP-098, APP-099, APP-100).</p> <p>Potential impacts have also been identified and the significance of the effects on physical processes receptors has been assessed in section 1.9 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-1.</p>



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Policy	Key Provisions	How and where considered in the Environmental Statement
NW-CE-1	<p>Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>a) avoid</li> <li>b) minimise</li> <li>c) mitigate - adverse cumulative and/or in-combination effects so they are no longer significant.</li> </ul>	<p>A CEA has been undertaken and is outlined in section 1.10 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>Potential impacts from the CEA have also been identified and the significance of the effects on physical processes receptors has been assessed in section 1.11 (Volume 2, Chapter 1: Physical processes (APP-013)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CE-1.</p>

**Benthic subtidal ecology (Volume 2, Chapter 2: Benthic subtidal ecology (APP-020))**

NW-SCP-1	<p>Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.</p>	<p>As part of this chapter (as well as Volume 4, Annex 2.1: Benthic subtidal ecology technical report of the Environmental Statement (APP-050), designated sites within the Morgan benthic subtidal ecology study area have been identified (section 2.5.6 of Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)). This was done to ensure all habitats, features and species of conservation importance were considered, where relevant, in this assessment. The Morgan Generation Assets project therefore accords with policy NW-SCP-1.</p>
NW-MPA-1	<p>Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported.</p>	<p>As part of this chapter, designated sites within the Morgan benthic subtidal ecology study area have been identified (section 2.5.6 of Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)). This was done to ensure all habitats, features and species of conservation importance were considered, where relevant, in this assessment.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-1.</p>
NW-BIO-1	<p>NW-BIO-1 encourages and supports proposals that enhance the distribution of priority habitats and priority species.</p>	<p>The Morgan Generation Assets will seek to enhance biodiversity. The Biodiversity Benefit Statement (APP-073) outlines the approach of the Morgan Generation Assets to biodiversity enhancement.</p> <p>The Morgan Generation Assets will aim to conserve habitat through a number of measures adopted to reduce the impact of the Morgan Generation Assets (section 2.7.1.2 of Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-1.</p>
NW-BIO-2	<p>NW-BIO-2 requires proposals to manage negative effects which may significantly adversely impact the functioning of healthy, resilient and adaptable marine ecosystems.</p>	<p>Mitigation is considered where the significance of an impact is moderate or major to reduce the significance of the impact to negligible or minor. This assessment is undertaken for each impact (Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-2.</p>
NW-BIO-3	<p>Proposals that conserve, restore or enhance coastal habitats, where important in their own right and/or for ecosystem functioning and provision of ecosystem services, will be supported.</p>	<p>Section 2.7.1.2 considers the magnitude, sensitivity and significance of the impacts associated with the Morgan Generation Assets on the relevant subtidal important ecological features (IEF) (Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)). Additionally considering</p>

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Policy	Key Provisions	How and where considered in the Environmental Statement
		<p>mitigation where impacts were found to be significant. As a result the Morgan Generation Assets seeks to conserve the function and services provided by coastal habitats.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-3.</p>
NW-INNS-1	<p>NW-INNS-1 aims to avoid or minimise damage to the marine area from the introduction or transport of invasive non-native species.</p>	<p>The implementation of an EMP as part of the measures adopted by the Morgan Generation Assets (section 2.7.1.2 and Table 2.17 of Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)) will manage and reduce the risk of introduction or spread of invasive species.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-INNS-1.</p>
NW-CE-1	<p>Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will avoid, minimise and mitigate.</p>	<p>Cumulative effects have been quantified and their significance assessed in section 2.11 (Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)). This section includes the consideration of mitigation where the significance is found to be moderate or major.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CE-1.</p>

**Fish and shellfish ecology (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021))**

NW-FISH-3	<p>Proposals that enhance essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, should be supported. Proposals that may have significant adverse impacts on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse impacts so they are no longer significant.</p>	<p>The areas of essential fish habitat potentially impacted have been identified in Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (APP-051); the baseline (section 3.5 of (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)) and assessed in detail in section 3.9 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-FISH-1.</p>
NW-MPA-1	<p>Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported. Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse impacts, with due regard given to statutory advice on an ecologically coherent network.</p>	<p>MPAs with fish and shellfish features have been identified in section 3.6.3 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)). Assessment of impacts on features of these sites, where relevant, are presented in section 3.9 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), with site specific assessments presented in section 3.4.3 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), and section 8.10 of Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (APP-051). Mitigation follows the mitigation hierarchy, and is broadly assessed in the measures adopted as part of the Morgan Generation Assets (section 3.7.1.2 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), and where appropriate in each impact assessment if the impact was deemed to be moderate or above.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-1.</p>
NW-BIO-2	<p>Proposals that enhance or facilitate native species or habitat adaptation or connectivity, or native species migration, will be</p>	<p>Volume 4, Annex 3.1: Fish and shellfish ecology technical report of the Environmental Statement (APP-051) presents a detailed characterisation of the fish and</p>



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Policy	Key Provisions	How and where considered in the Environmental Statement
	<p>supported. Proposals that may cause significant adverse impacts on native species or habitat adaptation or connectivity, or native species migration, must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant d) compensate for significant adverse impacts that cannot be mitigated.</p>	<p>shellfish ecology in the fish and shellfish ecology study area, which is summarised in section 3.5 Assessment of impacts, with consideration of mitigation measures, on these receptors is presented in section 3.9 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)). Mitigation follows the mitigation hierarchy and is broadly assessed in the measures adopted as part of the Morgan Generation Assets (section 3.7.1.2 of (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021))).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-1.</p>
NW-INNS-1	<p>Proposals that reduce the risk of introduction and/or spread of non-native invasive species should be supported. Proposals must put in place appropriate measures to avoid or minimise significant adverse impacts that would arise through the introduction and transport of invasive non-native species, particularly when: 1) moving equipment, boats or livestock (for example fish or shellfish) from one water body to another 2) introducing structures suitable for settlement of invasive non-native species, or the spread of invasive non-native species known to exist in the area.</p>	<p>The prevention of the spread of INNS has been highlighted and considered in section 3.7.1.2 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), dealing with measures adopted as part of the Morgan Generation Assets, with justifications given. These are also considered in the impact assessment section 3.9 (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-INNS-1.</p>
NW-DIST-1	<p>Proposals that may have significant adverse impacts on highly mobile species through disturbance or displacement must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse impacts so they are no longer significant.</p>	<p>This has been examined specifically in the impacts of sound during all phases of the development, as detailed in section 3.9.3, as well as the whole of section 3.9 more broadly (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)). Mitigation follows the mitigation hierarchy and is broadly assessed in the measures adopted as part of the Morgan Generation Assets (section 3.7.1.2 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), and where appropriate in each impact assessment if the impact was deemed to be moderate or above.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-DIST-1.</p>
NW-UWN-2	<p>Proposals that result in the generation of impulsive or non-impulsive noise must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse impacts on highly mobile species so they are no longer significant. If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding.</p>	<p>The potential impacts of sound resulting from the construction, operation and maintenance, and decommissioning phases have been considered in the sound impact assessment (section 3.9.3 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)). Mitigation follows the mitigation hierarchy and is broadly assessed in the measures adopted as part of the Morgan Generation Assets (section 3.7.1.2 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), and where appropriate in each impact assessment if the impact was deemed to be moderate or above.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-UWN-1.</p>
NW-CE-1	<p>Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will, in order of preference: a) avoid b) minimise c)</p>	<p>The potential impacts on other existing, authorised, or reasonably foreseeable proposals have been examined in the Cumulative Effects Assessment (CEA) (section 3.11 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)). Mitigation follows the mitigation hierarchy</p>

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	mitigate – adverse cumulative and/or in-combination effects so they are no longer significant.	and is broadly assessed in the measures adopted as part of the Morgan Generation Assets (section 3.7.1.2 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)), and where appropriate in each impact assessment if the impact was deemed to be moderate or above.  The Morgan Generation Assets project therefore accords with policy NW-CE-1.
NW-CBC-1	Proposals must consider cross-border impacts throughout the lifetime of the proposed activity. Proposals that impact upon one or more marine plan areas or terrestrial environments must show evidence of the relevant public authorities (including other countries) being consulted and responses considered.	Any potential cross-border impacts have been assessed in the transboundary effects (section 3.12 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)) and inter-related effects (section 3.13 of Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)) sections.  The Morgan Generation Assets project therefore accords with policy NW-CBC-1.

**Marine mammals (Volume 2, Chapter 4: Marine mammals (AS-010))**

NW-MPA-1	Proposals that support the objectives of marine protected areas and the ecological coherence of the marine protected area network will be supported.  Proposals that may have adverse impacts on the objectives of marine protected areas must demonstrate that they will, in order of preference: a. avoid b. minimise c. mitigate  adverse impacts, with due regard given to statutory advice on an ecologically coherent network.	This chapter presents the spatial scale of potential effects in relation to sites protected for marine mammal features (e.g. SACs, MNRs) (Volume 2, Chapter 4: Marine mammals (AS-010)). A detailed assessment of the spatial overlap with European nature conservation designations has been undertaken as part of the HRA (HRA Stage 2 ISAA (APP-096)). Measures have been adopted as part of the Morgan Generation Assets to reduce the spatial scale of potential effects and are described in section 4.8 (Volume 2, Chapter 4: Marine mammals (AS-010)).  The Morgan Generation Assets project therefore accords with policy NW-MPA-1.
NW-BIO-2	NW-BIO-2 requires proposals to manage negative effects which may significantly adversely impact the functioning of healthy, resilient and adaptable marine ecosystems.	The Applicant will implement a range of measures adopted (primary and tertiary) as part of the Morgan Generation Assets to mitigate potential negative effects which are detailed in section 4.9 (Volume 2, Chapter 4: Marine mammals (AS-010)).  The Morgan Generation Assets has also committed to an Underwater sound management strategy (with an Outline underwater sound management strategy included as part of the application for consent, (APP-068)), which, post-consent, will set out the approach to further management measures that may be required to reduce the impact such that there will be no residual significant effect for underwater sound, following a refined project design and more detailed information post consent.  The Morgan Generation Assets project therefore accords with policy NW-BIO-2.
NW-UWN-2	Proposals that result in the generation of impulsive or non-impulsive noise must demonstrate that they will, in order of preference: a. avoid b. minimise	The potential impacts of underwater sound resulting from the construction, operations and maintenance, and decommissioning phases have been considered in the underwater sound impact assessment (section 4.9.2 of Volume 2, Chapter 4: Marine mammals (AS-010)). The Applicant will implement a range of measures adopted (primary and tertiary) as part of the Morgan Generation

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Policy	Key Provisions	How and where considered in the Environmental Statement
	<p>c. mitigate</p> <p>Adverse impacts on highly mobile species so they are no longer significant.</p>	<p>Assets which will reduce the potential effects of sound, detailed in section 4.8 (Volume 2, Chapter 4: Marine mammals (AS-010)).</p> <p>The Morgan Generation Assets has also committed to an Underwater sound management strategy (with an Outline underwater sound management strategy included as part of the application for consent (APP-068)), which post-consent will set out the approach to further management measures that may be required to reduce the impact such that that there will be no residual significant effect from underwater sound from the project alone, following a refined project design and more detailed information post consent.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-UWN-2.</p>
NW-CE-1	<p>Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will avoid, minimise and mitigate.</p>	<p>Potential cumulative effects have been quantified and their significance assessed in section 4.11 (Volume 2, Chapter 4: Marine mammals (AS-010)). A detailed Outline MMMP (APP-072) will be developed post-consent subject to project refinements and will consider mitigation in order to reduce the potential effects for the project alone, which will reduce the contribution to potential cumulative effects.</p> <p>The Morgan Generation Assets has also committed to an Underwater sound management strategy (with an Outline underwater sound management strategy included as part of the application for consent (APP-068)), which post-consent will set out the approach to further management measures that may be required to reduce the magnitude of the impact such that that there will be no residual significant effect from underwater sound from the project alone.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CE-1.</p>

**Offshore ornithology (Volume 2, Chapter 5: Offshore ornithology (APP-023))**

NW-SCP-1	<p>Proposals within or relatively close to nationally designated areas should have regard to the specific statutory purposes of the designated area. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty.</p>	<p>As part of this chapter (Volume 2, Chapter 5 Offshore ornithology (APP-023); as well as Volume 4, Annex 5.1: Offshore ornithology baseline characterisation report of the Environmental Statement (APP-053)), designated sites with mobile features connected to the Morgan Generation Assets have been identified. This is to ensure that all features and species of conservation importance were considered, where relevant, in this assessment.</p> <p>The HRA Stage 1 Screening Report (APP-099) considers the direct or indirect effects on features of relevant Special Protection Area (SPA) sites, and where relevant will be included in the HRA Stage 2 ISAA – Part 3 - SPA assessments (APP-098).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-SCP-1.</p>
NW-MPA-1	<p>Proposals that support the objectives of marine protected areas and the ecological</p>	<p>As part of this chapter (Volume 2, Chapter 5 Offshore ornithology (APP-023); as well as Volume 4, Annex 5.1: Offshore ornithology baseline characterisation report of the Environmental Statement (APP-053)), designated sites with mobile features connected to the Morgan</p>

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Policy	Key Provisions	How and where considered in the Environmental Statement
	coherence of the marine protected area network will be supported.	<p>Generation Assets have been identified (section 5.5.3 of Volume 2, Chapter 5 Offshore ornithology (APP-023)). This is to ensure that all features and species of conservation importance were considered, where relevant, in this assessment.</p> <p>The E1.4 HRA Phase 1 Screening Report considers the direct or indirect effects on features of relevant SPA sites (APP-099), and where relevant will be included E1.3 ISAA Part 3 – SPA assessments (APP-098).</p> <p>Please also see the Biodiversity benefit statement (APP-073).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-1.</p>
NW-BIO-1	NW-BIO-1 encourages and supports proposals that enhance the distribution of priority habitats and priority species.	<p>The Morgan Generation Assets will aim to conserve habitats and species as far as reasonably practicable through a number of measures adopted to reduce the impact of the Morgan Generation Assets (section 5.7.1.2 of Volume 2, Chapter 5 Offshore ornithology (APP-023)).</p> <p>Please also see the Biodiversity benefit statement (APP-073).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-1.</p>
NW-BIO-2	NW-BIO-2 requires proposals to manage negative effects which may significantly adversely impact the functioning of healthy, resilient and adaptable marine ecosystems.	<p>In addition to measures adopted as part of the Morgan Generation Assets and sensitive project design, secondary mitigation has considered where an impact is considered to be significant in EIA terms. This assessment is undertaken for each impact in section 5.9 where necessary (Volume 2, Chapter 5 Offshore ornithology (APP-023)).</p> <p>Please also see the Biodiversity benefit statement (APP-073).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-BIO-2.</p>
NW-CE-1	Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will avoid, minimise and mitigate.	<p>Cumulative effects have been quantified and their significance assessed in section 5.11 (Volume 2, Chapter 5 Offshore ornithology (APP-023)). The assessment has adhered to the mitigation hierarchy (to avoid, minimise and mitigate) as set out in Volume 1, Chapter 5: EIA Methodology Chapter of the Environmental Statement (APP-012) and the site selection process described in Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (APP-011).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CE-1.</p>
<b>Commercial fisheries (Volume 2, Chapter 6: Commercial fisheries (APP-024))</b>		
NW-FISH-2	Proposals that may have significant adverse impacts on access for fishing activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant. If it is not possible to mitigate	<p>The Applicant is taking and will continue to take steps to minimise the potential impacts upon the fishing industry in the area through appropriate mitigation where required. Designed-in measures related to commercial fisheries are provided in section 6.7 (Volume 2, Chapter 6 Commercial fisheries (APP-024)).</p>

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	significant adverse impacts, proposals should state the case for proceeding.	The Morgan Generation Assets project therefore accords with policy NW-FISH-2.
NW-FISH-3	Proposals that may have significant adverse impacts on essential fish habitat, including spawning, nursery and feeding grounds, and migratory routes, must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.	<p>The Morgan Generation Assets assessment has considered the impacts on fish stocks in Volume 2, Chapter 3: Fish and shellfish ecology of the Environmental Statement (Volume 2, Chapter 3: Fish and shellfish ecology (APP-021)); this chapter includes potential impacts on habitats, spawning, nursery and feeding grounds, and migratory routes.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-FISH-3.</p>
NW-CE-1	Proposals which may have adverse cumulative effects with other existing, authorised, or reasonably foreseeable proposals must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse cumulative and/or in-combination effects so they are no longer significant.	<p>Cumulative impacts on commercial fisheries are assessed in section 6.10 (Volume 2, Chapter 6 Commercial fisheries (APP-024)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CE-1.</p>
NW-CO-1	Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate – adverse impacts so they are no longer significant. If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding.	<p>The Applicant is taking and will continue to take steps to minimise the impacts upon the fishing industry in the area through appropriate mitigation where required. Designed-in measures related to commercial fisheries are provided in section 6.7 (Volume 2, Chapter 6 Commercial fisheries (APP-024)), and include a commitment to develop a Fisheries Liaison and Co-existence Plan. An outline of this plan has been included with the Application (APP-065).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CO-1.</p>

**Shipping and navigation (Volume 2, Chapter 7: Shipping and navigation (APP-025))**

NW-PS-1	<p>Only proposals demonstrating compatibility with current port and harbour activities will be supported. Proposals within statutory harbour authority areas or their approaches that detrimentally and materially affect safety of navigation, or the compliance by statutory harbour authorities with the Open Port Duty or the Port Marine Safety Code, will not be authorised unless there are exceptional circumstances.</p> <p>Proposals that may have a significant adverse impact upon future opportunity for sustainable expansion of port and harbour activities, must demonstrate that they will, in order of preference: a) avoid, b) minimise, c) mitigate adverse impacts so they are no longer significant. If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.</p>	<p>Impacts to navigation are described in section 7.10 (Volume 2, Chapter 7 Shipping and navigation (APP-025)) and in Volume 4, Annex 7.1: Navigational risk assessment of the Environmental Statement (APP-060). In particular, the impacts on commercial shipping routes and the approaches to ports/harbours are given in sections 7.9.2, 7.9.3 and 7.9.4 (Volume 2, Chapter 7 Shipping and navigation (APP-025)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-PS-1.</p>
NW-PS-2	Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance must not be authorised	Sea lane locations are presented in section 7.5 and impact on vessel routing measures presented in section 7.9.2 (Volume 2, Chapter 7 Shipping and



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Policy	Key Provisions	How and where considered in the Environmental Statement
	within or encroaching upon IMO routing systems unless there are exceptional circumstances.	navigation (APP-025)). The assessment demonstrates that the Morgan Generation Assets does not encroach upon routing schemes such as TSS.  The Morgan Generation Assets project therefore accords with policy NW-PS-2.
NW-PS-3	Proposals that require static sea surface infrastructure or that significantly reduce under-keel clearance which encroaches upon high density navigation routes, strategically important navigation routes, or that pose a risk to the viability of passenger services, must not be authorised unless there are exceptional circumstances.	Inter-array and interconnector cables within the Morgan Array Area would be in sufficiently deep water that any cable protection would not compromise the clearances required for deep draught vessels. The assessment demonstrates that the Morgan Generation Assets does not significantly reduce Under Keel Clearance (Volume 2, Chapter 7 Shipping and navigation (APP-025)).  The Morgan Generation Assets project therefore accords with policy NW-PS-3.

### Marine archaeology and cultural heritage (Volume 2, Chapter 8: Marine archaeology and cultural heritage (APP-026))

NW-HER-1	This policy aims to conserve and enhance marine and coastal heritage assets by considering the potential for harm to their significance. This consideration will not be limited to designated assets and extends to those non-designated assets that are, or have the potential to become, significant. The policy will ensure that assets are considered in the decision-making process and will make provisions for those assets that are discovered during developments.	The potential for harm to the significance of marine heritage assets by the Morgan Generation Assets has been assessed in section 8.8 (Volume 2, Chapter 8 Marine archaeology and cultural heritage (APP-026)), which includes the assessment of non-designated marine heritage assets identified within the Morgan marine archaeology study area. Mitigation measures have been adopted as part of the Morgan Generation Assets to protect the known archaeology assets and make provisions for those assets that are discovered during the development of Morgan Generation Assets in the Outline Offshore WSI and PAD (APP-069).  The Morgan Generation Assets project therefore accords with policy NW-HER-1.
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### Other sea users (Volume 2, Chapter 9: Other sea users (APP-027))

NW-AGG-1	Proposals in areas where a licence for extraction of aggregates has been granted or formally applied for should not be authorised, unless it is demonstrated that the proposal is compatible with aggregate extraction.	As shown on Figure 9.2 (Volume 2, Chapter 9 Other sea users (APP-027)), there is no overlap between the Morgan Generation Assets and any marine aggregate extraction sites.  The Morgan Generation Assets project therefore accords with policy NW-AGG-1.
NW-CO-1	Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference, avoid, minimise, or mitigate adverse impacts so they are no longer significant.  If it is not possible to mitigate significant adverse impacts, proposals must state the case for proceeding.	As described in Volume 1, Chapter 4: Site selection and consideration of alternatives of the Environmental Statement (APP-011), the Morgan Generation Assets have been sited to minimise potential impacts on other sea users where possible.  Measures adopted as part of the Morgan Generation Assets (with relevance to other sea users) are contained in section 9.8, and an assessment of potential impacts is contained in section 9.9 (Volume 2, Chapter 9 Other sea users (APP-027)).  The Morgan Generation Assets project therefore accords with policy NW-CO-1.
NW-CAB-1	Preference should be given to proposals for cable installation where the method of protection is burial.	Cable burial is one of the measures adopted as part of the Morgan Generation Assets listed in section 9.8 (Volume 2, Chapter 9 Other sea users (APP-027)).



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	Where burial is not achievable, decisions should take account of protection measures for the cable that may be proposed by the applicant. Where burial or protection measures are not appropriate, proposals should state the case for proceeding without those measures.	The Morgan Generation Assets project therefore accords with policy NW-CAB-1.
NW-CAB-3	Where seeking to locate close to existing subsea cables, proposals should demonstrate compatibility with ongoing function, maintenance and decommissioning activities relating to the cable.	Cable proximity agreements are measures adopted as part of the Morgan Generation Assets listed in section 9.8 (Volume 2, Chapter 9 Other sea users (APP-027)). The Morgan Generation Assets project therefore accords with policy NW-CAB-3.
NW-OG-1	Proposals in areas where a licence for oil and gas has been granted or formally applied for should not be authorised unless it is demonstrated that the other development or activity is compatible with the oil and gas activity.	Potential impacts on oil and gas activities are assessed in sections 9.9.3, 9.9.4 and 9.9.5 (Volume 2, Chapter 9 Other sea users (APP-027)). The Morgan Generation Assets project therefore accords with policy NW-OG-1.
<b>Seascape, landscape and visual resources (Volume 2, Chapter 10: Seascape, landscape and visual resources (APP-014))</b>		
NW-CO-1	Proposals that optimise the use of space and incorporate opportunities for co-existence and co-operation with existing activities will be supported.	The Agreement for Lease (AfL) area is the result of the UK Offshore Wind Leasing Round 4 including the plan-level Habitat Regulations Assessment undertaken by The Crown Estate. Within that area and given other 'hard' constraints, there is little opportunity for relocating the Morgan Generation Assets. Other mitigation is considered in Table 10.18 (Volume 2, Chapter 10 Seascape, landscape and visual resources (APP-014)). The Morgan Generation Assets project therefore accords with policy NW-CO-1.
NW-REN-1	Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported.	The socio-economic effects of the Morgan Offshore Wind Project are considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement (APP-017). The Morgan Generation Assets project therefore accords with policy NW-REN-1.
NW-REN-2	Proposals for new activity within areas held under a lease or an agreement for lease for renewable energy generation should not be authorised, unless it is demonstrated that the proposed development or activity will not reduce the ability to construct, operate or decommission the existing or planned energy generation project.	The Applicant entered into the AfL for the Morgan Generation Assets in 2022. The Morgan Generation Assets project therefore accords with policy NW-REN-2.
NW-REN-3	Proposals for the installation of infrastructure to generate offshore renewable energy, inside areas of identified potential and subject to relevant assessments, will be supported.	The proposed Morgan Generation Assets aligns with this policy. See Volume 1, Chapter 4: Site Selection and Consideration of Alternatives of the Environmental Statement (APP-011) for details for further detail on site selection criteria. The Morgan Generation Assets project therefore accords with policy NW-REN-3.
NW-SCP-1	Proposals should ensure they are compatible with their surroundings and	The assessment of potential impacts is set out within section 10.8 (Volume 2, Chapter 10 Seascape,

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Policy	Key Provisions	How and where considered in the Environmental Statement
	<p>should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area.</p>	<p>landscape and visual resources (APP-014)). Measures adopted as part of the Morgan Generation Assets are set out within section 10.7 (Volume 2, Chapter 10 Seascape, landscape and visual resources (APP-014)). A summary of potential effects is set out in section 10.13 (Volume 2, Chapter 10 Seascape, landscape and visual resources (APP-014)).</p> <p>The effects of Morgan Generation Assets on the Lake District National Park are documented in Volume 4, Annex 10.5: International and nationally designated landscape study of the Environmental Statement and includes consideration of the Lake District National Park and the English Lake District World Heritage Site (APP-038).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-SCP-1.</p>
NW-TR-1	<p>Proposals that promote or facilitate sustainable tourism and recreation activities, or that create appropriate opportunities to expand or diversify the current use of facilities, should be supported.</p>	<p>The effects on tourism and recreation are considered in Volume 2, Chapter 13: Socio-economics of the Environmental Statement (APP-017).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-TR-1.</p>
NW-CBC-1	<p>Proposals must consider cross-border impacts throughout the lifetime of the proposed activity. Proposals that impact upon one or more marine plan areas or terrestrial environments must show evidence of the relevant public authorities (including other countries) being consulted and responses considered.</p>	<p>Cross-border and transboundary impacts are considered in section 10.11 (Volume 2, Chapter 10 Seascape, landscape and visual resources (APP-014)). For Morgan Generation Assets, these are limited to the landmasses framing this part of the Irish Sea, namely England, the Isle of Man and Wales as well as the territorial waters that lie within the 50 km SLVIA Study Area.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-CBC-1.</p>

**Aviation and radar (Volume 2, Chapter 11: Aviation and radar (APP-015))**

NW-DEF-1	<p>Proposals in or affecting Ministry of Defence areas should only be authorised with agreement from the Ministry of Defence.</p>	<p>The Morgan Generation Assets do not overlap with any MOD defence areas (see section 11.5 of (Volume 2, Chapter 11 Aviation and radar (APP-015))). Consultation with the MOD is summarised in Table 11.4 (Volume 2, Chapter 11 Aviation and radar (APP-015)).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-DEF-1.</p>
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**Climate change (Volume 2, Chapter 12: Climate change (APP-016))**

NW-REN-1	<p>Proposals that enable the provision of renewable energy technologies and associated supply chains, will be supported.</p>	<p>Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (APP-009).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-REN-1.</p>
NW-REN-2	<p>Proposals for new activity within areas held under a lease or an agreement for lease for renewable energy generation should not be authorised, unless it is demonstrated that the proposed development or activity will not reduce the ability to construct, operate or decommission the existing or planned energy generation project.</p>	<p>Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (APP-009).</p> <p>The Morgan Generation Assets project therefore accords with policy NW-REN-2.</p>

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Policy	Key Provisions	How and where considered in the Environmental Statement
NW-REN-3	Proposals for the installation of infrastructure to generate offshore renewable energy, inside areas of identified potential and subject to relevant assessments, will be supported.	Volume 1, Chapter 2: Policy and legislative context of the Environmental Statement (APP-009). The Morgan Generation Assets project therefore accords with policy NW-REN-3.
NW-CC-2	Proposals in the north west marine plan areas should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change.	A climate risk assessment (Volume 4, Annex 12.2: Climate change risk assessment of the Environmental Statement (APP-047)) has been carried out to assess the projects resilience to likely changes to the climate. The assessment of climate change risk is presented in section 12.10 of this chapter (Volume 2, Chapter 12 Climate change (APP-016)). The Morgan Generation Assets project therefore accords with policy NW-CC-2.
NW-CC-3	Proposals in the north west marine plan areas, and adjacent marine plan areas, that are likely to have significant adverse impact on coastal change, or on climate change adaptation measures inside and outside of the proposed project areas, should only be supported if they can demonstrate that they will, in order of preference:  Avoid  Minimise  Mitigate - adverse impacts so they are no longer significant.	The assessment (section 12.9 of Volume 2, Chapter 12 Climate change (APP-016)) presents the likely significant effects on climate change and the proposed mitigation that would avoid, minimise or otherwise mitigate. The Morgan Generation Assets project therefore accords with policy NW-CC-3.

**Socio-economics (Volume 2, Chapter 13: Socio-economics (APP-017))**

NW-REN-1	Supply chains are recognised as important factors in harnessing the economic and social benefits of renewable energy in the UK. NWREN-1 will enable public authorities to support proposals that reduce costs, ensuring that businesses are operating competitively and with a long-term strategy. This will help develop stronger supply chains for renewable energy technology in the UK.	Volume 4, Annex 13.1: Socio-economics technical impact report of the Environmental Statement (APP-048) provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), which apply throughout the offshore wind supply chain. The Morgan Generation Assets project therefore accords with policy NW-REN-1.
NW-EMP-1	NW-EMP-1 encourages decision-makers and proponents to deliver additional employment benefits from proposals, particularly those benefits associated with the listed policy criteria. NW-EMP-1 seeks to maximise sustainable economic activity, prosperity and opportunities for all, both now and in the future.	Volume 4, Annex 13.1: Socio-economics technical impact report of the Environmental Statement (APP-048) provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), at regional and national levels. The potential impact on economic receptors including employment, GVA and supply chain demand is assessed for its significance in section 13.8.2 (Volume 2, Chapter 13 Socio-economics (APP-017)). The potential impact of increased employment opportunities is assessed for its significance in section 13.8.2 (Volume 2, Chapter 13 Socio-economics (APP-017)). The Morgan Generation Assets project therefore accords with policy NW-EMP-1.

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Policy	Key Provisions	How and where considered in the Environmental Statement
NW-TR-1	The north west marine plan recognises tourism and recreation as important industries which provide economic and social benefits to coastal communities and visitors to the region. NW-TR-1 addresses the potential impact of proposals on existing tourism and recreation use to minimise stakeholder or future potential activities. Proposals that cannot avoid, minimise and mitigate significant adverse impacts on tourism and recreation activities are unlikely to be supported.	The potential impacts on tourism and recreation is assessed for its significance in section 13.8.2 (Volume 2, Chapter 13 Socio-economics (APP-017)). This assessment is informed by: Volume 2, Chapter 10: Seascape, landscape and visual resources of the Environmental Statement (APP-014) and Volume 2, Chapter 9: Other sea users of the Environmental Statement (APP-027). The Morgan Generation Assets project therefore accords with policy NW-TR-1.
NW-CE-1	This policy is intended to ensure all relevant effects are taken account of and addressed, including those that may seem less significant in their own right. This will help to ensure that the cumulative effect on the wider environment of the north west marine area and other relevant receptors are effectively managed.	Section 13.11 cumulative effects assessments considers the potential cumulative impacts of relevant major projects (Volume 2, Chapter 13 Socio-economics (APP-017)). The Morgan Generation Assets project therefore accords with policy NW-CE-1.
NW-INF-1	NW-INF-1 supports the integration of the marine and land based systems by encouraging proposals that improve existing or provide new, sustainable marine or land-based infrastructure that facilitates activity in the other system. Supporting infrastructure development, diversification and regeneration will provide socio-economic benefits and support marine businesses, including those that are land-based.	Volume 4, Annex 13.1: Socio-economics technical impact report of the Environmental Statement (APP-048) provides an assessment of the direct, indirect and induced potential economic impacts (employment and GVA), which apply throughout the offshore wind supply chain. The Morgan Generation Assets project therefore accords with policy NW-INF-1.
<b>Human health assessment (Volume 2, Chapter 14: Human health assessment (APP-018))</b>		
NW-WQ-1	Proposals that protect, enhance and restore water quality will be supported.	The water quality effects of the Morgan Generation Assets to population health are discussed in section 14.4.2 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-WQ-1.
NW-FISH-2	Proposals that may have significant adverse impacts on access for fishing activities must demonstrate that they will, in order of preference: a) avoid; b) minimise; c) mitigate adverse impacts so they are no longer significant.	Economic effects that could influence population health are discussed in section 14.9.4 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-FISH-2.
NW-SCP-1	Proposals should ensure they are compatible with their surroundings and should not have a significant adverse impact on the character and visual resource of the seascape and landscape of the area.	Visual effects that could influence population health are discussed in section 14.9.3 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-SCP-1.
NW-CO-1	Proposals that may have significant adverse impacts on, or displace, existing activities must demonstrate that they will, in order of preference: a) avoid; b) minimise; c) mitigate	Sea transport access between the Isle of Man and the mainland that could affect population health is discussed in section 14.9.2 (Volume 2, Chapter 14 Human health assessment (APP-018)).

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Policy	Key Provisions	How and where considered in the Environmental Statement
	adverse impacts so they are no longer significant.	The Morgan Generation Assets project therefore accords with policy NW-CO-1.
NW-EMP-1	Proposals that result in a net increase in marine-related employment will be supported.	Economic effects that could influence population health area discussed in section 14.9.4 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-EMP-1.
NW-REN-1 NW-AIR-1	Proposals that enable the provision of renewable energy technologies and associated supply chains will be supported. Clean air is essential for life, health, the environment and the economy. Air pollution and greenhouse gas emissions must be reduced to protect health, habitats and species and reduce the impacts of climate change.	The renewable energy benefits of the Morgan Generation Assets to population health are discussed in section 14.9.6 (Volume 2, Chapter 14 Human health assessment (APP-018)). The population health benefits of renewable energy for reduction of greenhouse gas emissions are discussed in section 14.9.5 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-REN-1 and NW-AIR-1.
NW-SOC-1	Those bringing forward proposals should consider and demonstrate how their development shall enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.	Public information sharing is discussed in section 14.9.2 and section 14.9.3 (Volume 2, Chapter 14 Human health assessment (APP-018)). The Morgan Generation Assets project therefore accords with policy NW-SOC-1.

**Policies identified by the MMO in their WR**

NW-ACC-1	Proposals demonstrating appropriate enhanced and inclusive public access to and within the marine area, including the provision of services for tourism and recreation activities, will be supported. Proposals that may have significant adverse impacts on public access should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - adverse impacts so they are no longer significant.	Potential for displacement of recreational activities has been assessed in Volume 2, Chapter 9: Other sea users (APP-027) as being of minor adverse significance, which is not significant in EIA terms (Table 9.21 of Volume 2, Chapter 9: Other sea users (APP-027)). The mitigation hierarchy has been applied and a number of measures (primary and tertiary) have been adopted as part of the Morgan Generation Assets to reduce the potential for impacts on other sea users (Table 9.13 of Volume 2, Chapter 9: Other sea users (APP-027)). The Morgan Generation Assets project therefore accords with policy NW-ACC-1.
NW-AGG-3	Proposals in areas of high potential aggregate resource that may have significant adverse impacts on future aggregate extraction should demonstrate that they will, in order of preference: a) avoid b) minimise c) mitigate - significant adverse impacts on future aggregate extraction so they are no longer significant.	There is no overlap between the Morgan Generation Assets and any marine aggregate extraction sites and therefore any potential significant effects have been avoided (see Table 9.4 and Figure 9.2 of Volume 2, Chapter 9: Other sea users (APP-027)). The Morgan Generation Assets project therefore accords with policy NW-AGG-3.



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Policy	Key Provisions	How and where considered in the Environmental Statement
	If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.	
NW-AQ-2	Proposals enabling the provision of infrastructure for sustainable aquaculture and related industries will be supported.	This policy is not relevant to the Morgan Generation Assets application.
NW-CAB-2	<p>Proposals demonstrating compatibility with existing landfall sites and incorporating measures to enable development of future landfall opportunities should be supported. Where this is not possible proposals will, in order of preference:</p> <ul style="list-style-type: none"> <li>a) avoid</li> <li>b) minimise</li> <li>c) mitigate</li> </ul> <p>- adverse impacts on existing and potential future landfall sites so they are no longer significant.</p> <p>If it is not possible to mitigate significant adverse impacts, proposals should state the case for proceeding.</p>	<p>The Morgan Generation Assets application is for the generation assets only, and therefore the landfall for the electricity transmission cable that would connect the Morgan Generation Assets to the National Grid is not part of the DCO application.</p> <p>The Morgan Generation Assets has been scoped into the Pathways to 2030 workstream under the Offshore Transmission Network Review (OTNR). The OTNR aims to consider, simplify and wherever possible facilitate collaborative approach to offshore wind projects connecting to the UK National Grid. The Applicant intends to deliver a coordinated grid connection with the Morecambe Offshore Windfarm, including the sharing of offshore and onshore export cable corridors and grid connection location at Penwortham.</p> <p>In order to achieve this, the Applicant, together with the applicant for the Morecambe Offshore Windfarm has been granted a direction from the Secretary of State under section 35 of the 2008 Act to pursue a transmission assets consent (covering both projects' offshore and onshore transmission infrastructure) through the DCO process (see section 1.1.2 of Volume 1, Chapter 1: Introduction and overarching glossary (APP-008)).</p> <p>This policy is therefore not relevant to the Morgan Generation Assets application, but will be considered as part of the application for the Transmission Assets.</p>
NW-CC-1	<p>Proposals that conserve, restore or enhance habitats that provide flood defence or carbon sequestration will be supported. Proposals that may have significant adverse impacts on habitats that provide a flood defence or carbon sequestration ecosystem service must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>a) avoid</li> <li>b) minimise</li> <li>c) mitigate - adverse impacts so they are no longer significant</li> <li>d) compensate for significant adverse impacts that cannot be mitigated.</li> </ul>	This policy is not relevant to the Morgan Generation Assets application as the generation assets are sited wholly offshore.
NW-CCUS-1	Decommissioning programmes for oil and gas facilities should demonstrate that they have considered the potential for re-use of infrastructure.	This policy is not relevant to the Morgan Generation Assets application as it is not an oil and gas facility.



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Policy	Key Provisions	How and where considered in the Environmental Statement
NW-CCUS-2	Carbon capture, usage and storage proposals incorporating the re-use of existing oil and gas infrastructure will be supported.	This policy is not relevant to the Morgan Generation Assets application as it is not a carbon capture or storage proposal.
NW-CCUS-3	Proposals associated with the deployment of low carbon infrastructure for industrial clusters should be supported.	This policy is not relevant to the Morgan Generation Assets application as it is not sited at the potential regional cluster locations.
NW-DD-3	Proposals for the disposal of dredged material must demonstrate that they have been assessed against the waste hierarchy. Where there is the need to identify new dredge disposal sites, including alternative use sites, proposals should be supported if they conform to best practice and guidance.	Paragraph 3.5.4.8 in Volume 1, Chapter 3: Project description (APP-010) confirms that material subject to seabed preparation activities will be deposited in the vicinity of where it was removed. The Morgan Array Area site characterisation report (APP-067) contains details on the waste hierarchy and justification for why disposal <i>in situ</i> is the most appropriate option. The Morgan Generation Assets project therefore accords with policy NW-DD-3.
NW-DEF-1	Proposals in or affecting Ministry of Defence areas should only be authorised with agreement from the Ministry of Defence.	NW-DEF-1 is addressed within Table 11.3 in Volume 2, Chapter 11: Aviation and radar (APP-015). The Morgan Generation Assets project therefore accords with policy NW-DEF-1.
NW-FISH-1	Proposals that support a sustainable fishing industry, including the industry's diversification, should be supported.	This policy is not relevant to the Morgan Generation Assets application as the proposed development is an offshore renewable energy development.
NW-INNS-2	Public authorities with functions to manage activities that could potentially introduce, transport or spread invasive non-native species should implement adequate biosecurity measures to avoid or minimise the risk of introducing, transporting or spreading invasive non-native species.	The implementation of an offshore Environmental Management Plan (offshore EMP) will manage and reduce the risk of introduction or spread of invasive species (Table 2.17, Volume 2, Chapter 2: Benthic subtidal ecology (APP-020)). The Morgan Generation Assets project therefore accords with policy NW-INNS-2.
NW-ML-1	Public authorities must make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter.  Public authorities should aspire to undertake measures to remove marine litter within their jurisdiction.	Condition 20(e) of the deemed Marine Licences in the draft DCO (Schedules 3 and 4 within REP1-021) states that an offshore Environmental Management Plan (EMP) should include details of waste management and disposal arrangements. The implementation of the offshore EMP will therefore make adequate provision for the prevention, re-use, recycling and disposal of waste to reduce and prevent marine litter.  The Morgan Generation Assets project therefore accords with policy NW-ML-1.
NW-ML-2	Proposals that facilitate waste re-use or recycling to reduce or remove marine litter will be supported. Proposals that could potentially increase the amount of marine litter in the marine plan areas must include measures to, in order of preference: a) avoid b) minimise c) mitigate - waste entering the marine environment.	Condition 20(e) of the deemed Marine Licences in the draft DCO (Schedules 3 and 4 within REP1-021) states that an offshore Environmental Management Plan (EMP) should include details of waste management and disposal arrangements. The implementation of the offshore EMP will therefore include measures to avoid, minimise and mitigate waste entering the marine environment. The offshore EMP is also required to include details of a Marine Pollution Contingency Plan (MPCP). The MPCP will address the risks, methods and procedures to deal with any spills and collision incidents during the construction and operations and maintenance phases in relation to all activities carried

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Policy	Key Provisions	How and where considered in the Environmental Statement
		out. The Morgan Generation Assets project therefore accords with policy NW-ML-2.
NW-MPA-2	<p>Proposals that enhance a marine protected area's ability to adapt to climate change, enhancing the resilience of the marine protected area network, will be supported. Proposals that may have adverse impacts on an individual marine protected area's ability to adapt to the effects of climate change, and so reduce the resilience of the marine protected area network, must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>a) avoid</li> <li>b) minimise</li> <li>c) mitigate</li> </ul> <p>- adverse impacts.</p>	<p>The Morgan Generation Assets is a renewable energy development that, if consented, will contribute to the UK government commitment to reducing greenhouse gas emissions and reaching net zero by 2050 to help combat climate change. The Morgan Generation Assets would result in 324,370 tCO<sub>2</sub>e of avoided emissions over its lifetime when accounting for construction, operations and maintenance and decommissioning phases (paragraph 12.16.1.6, Volume 2, Chapter 12: Climate change (APP-016)). This will indirectly enhance the resilience of the marine protected area network.</p> <p>Table 1.187 in HRA Stage 2 Information to support an appropriate assessment Part 2: Special areas of conservation assessments (APP-097) and Table 1.86 in HRA Stage 2 information to support an appropriate assessment Part Three: Special Protection Areas and Ramsar Site assessments (APP-098) state there are no adverse effects on the integrity on any Special Areas of Conservation (SAC) or Special Protected Area (SPA) from the Morgan Generation Assets.</p> <p>The Morgan Generation Assets project therefore accords with policy NW-MPA-2.</p>
NW-MPA-3	Where statutory advice states that a marine protected area site condition is deteriorating or that features are moving or changing due to climate change, a suitable boundary change to ensure continued protection of the site and coherence of the overall network should be considered.	This policy is not relevant to the Morgan Generation Assets application. Any boundary changes to a marine protected area (MPA) would be led by the relevant Statutory Nature Conservation Body (SNCB). The Applicant does not have any powers to facilitate boundary changes to an MPA.
NW-MPA-4	<p>Proposals that may have significant adverse impacts on designated geodiversity must demonstrate that they will, in order of preference:</p> <ul style="list-style-type: none"> <li>a) avoid</li> <li>b) minimise</li> <li>c) mitigate – adverse impacts so they are no longer significant.</li> </ul>	NW-MPA-4 is addressed within Table 1.3 of Volume 2, Chapter 1: Physical processes (APP-013) and paragraph 2.6.1.34 in the Planning statement (APP-074). Designated sites and features of importance within the physical processes study area were identified (APP-013, section 1.5.2). Potential impacts were identified and the significance of the effects on physical processes receptors assessed (APP-013, section 1.9). Overall, it was concluded that there will be no significant effects arising from the Morgan Generation Assets during the construction, operations and maintenance or decommissioning phases. During the design process a range of parameters were considered and the mitigation hierarchy to avoid, minimise and mitigate potential impacts was followed. Measures to avoid, minimise and mitigate adverse impacts will be adopted (APP-013, Table 1.14). The Morgan Generation Assets project therefore accords with policy NW-MPA-4.
NW-OG-2	Proposals within areas of geological oil and gas extraction potential demonstrating compatibility with future extraction activity will be supported.	Volume 2, Chapter 9: Other sea users (APP-027) confirms that there are no licenced blocks overlapping with the local other sea users study area (paragraph 9.5.2.16, Figure 9.5). Three blocks offered as part of the 33 <sup>rd</sup> Oil and Gas Licensing Round overlap with the local other sea users study area (Figure 9.5), however these blocks have not yet been awarded. Continued communication with other offshore energy operators will

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

Policy	Key Provisions	How and where considered in the Environmental Statement
		<p>ensure relevant parties are kept informed of planned activities in order to minimise both spatial and temporal interactions between conflicting activities and maximise coexistence. The potential impact ‘reduction or restriction of other offshore energy activities’ has been assessed to be of minor adverse significance (see Volume 2, Chapter 9: Other sea users (APP-027)).</p>
NW-PS-4	<p>Proposals promoting or facilitating sustainable coastal and/or short sea shipping as an alternative to road, rail or air transport will be supported where appropriate.</p>	<p>NW-PS-4 is noted within Table 1.3 of Volume 4, Annex 7.1: Navigational risk assessment (APP-060) as being not applicable to the Morgan Generation Assets. This is because the Morgan Generation Assets has not been designed to promote or facilitate sustainable coastal and/or short sea shipping as an alternative to other forms of transport.</p>
NW-UWN-1	<p>Proposals that result in the generation of impulsive sound must contribute data to the UK Marine Noise Registry as per any currently agreed requirements. Public authorities must take account of any currently agreed targets under the Marine Strategy Part One Descriptor 11.</p>	<p>The submission of information to the Marine Noise Registry is secured as a condition within the draft Development Consent Order (DCO) (Schedules 3 and 4, Part 2, condition 24, S_D1_8 Draft Development Consent Order (Clean) (REP1-021)). The Morgan Generation Assets project therefore accords with policy NW-UWN-1.</p>