



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES  
2010

Morgan Offshore Wind Farm: Generation Assets

**Appendix H3 to the Natural England's Deadline 3 Submission**

**Natural England's Advice on Morgan Generation Assets Offshore In-Principle  
Monitoring Plan [REP2-013]**

For:

The construction and operation of the Morgan Offshore Wind Project: Generation Assets  
located approximately 37 km from the Northwest English Coast in the Irish Sea.

Planning Inspectorate Reference: EN010136

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12 November 2024

## **Natural England's advice on the updated Morgan Offshore In-Principle Monitoring Plan (IPMP)**

In formulating these comments, the following documents have been considered:

- S\_D2\_9 Offshore in-principle monitoring plan [REP2-013]

### **1) Summary of advice**

Natural England welcomes the submission of the updated IPMP at Deadline 2 [REP2-013]. Natural England's advice provided within this Appendix on the updated IPMP should be reviewed alongside our advice provided on the Morgan Generation IPMP [APP-066] at Deadline 1 (Appendix H1) [REP1-054].

The updated IPMP submitted at Deadline 3 resolves the concerns raised in our Relevant/Written representations [RR-26] and Deadline 1 submission [REP1-054] regarding physical processes and benthic ecology monitoring. However, our comments regarding monitoring for offshore ornithology and marine mammals monitoring remain unresolved. In addition, we advise the Applicant considers our response to ExQs relating to sufficiency of monitoring

### **2) Overarching Comments**

1. Further updates to IPMP: For some of the topics, including benthic ecology and physical processes, we acknowledge that this is an outline plan and therefore, further detail on survey methodologies will be provided post-consent. However, we advise that as much detail on specific hypotheses to be tested, monitoring objectives and duration of surveys should be provided at the consent stage.
2. Final Monitoring Plan: While we note the commitment to develop a final monitoring plan in accordance with the Offshore IPMP (APP-066) which is secured as a condition in the dMLs within the Draft DCO (REP1-021). The final monitoring plan should be agreed in consultation with the relevant SNCBs at the post consent/pre-construction stage. We also reiterate that adaptive monitoring and the undertaking of remediation measures where unforeseen impacts occur, should be secured as part of the plan.
3. Operation and Maintenance Activities: We note that whilst the updated IPMP considers how various O&M activities will be logged, there is no consideration of monitoring said activities from an environmental perspective or any safeguards to stop unforeseen

impacts occurring.

4. Examiners Questions on monitoring. We draw the Examiner's attention to our response on the first set of Questions [PD-004] MP1.10 (monitoring of biodiversity on infrastructure) and MO1.13 (Ornithology monitoring). Within Appendix K3 we have highlighted that further monitoring requirements to those currently included within the IPMP and/or raised in our Deadline 1 advice [Rep1-054] are likely to require further consideration by the Applicant.
5. Securing monitoring commitments: As highlighted within our 'other plans' tab in our Risks and Issues log (Appendix I3) there is mention of further monitoring proposed by the Applicant, but this is not secured on the DCO/dML or within a named plan and therefore there is no change to our Risks and Issues log. But we do believe these matters are readily resolvable.

### **3) Physical Processes & Benthic Ecology**

Natural England welcomes the inclusion of the following monitoring measures for physical processes and benthic ecology included within the updated In Principle Monitoring Plan, and Mitigation and Monitoring Schedule, submitted at Deadline 2:

- Monitoring for Invasive Non-Native Species (INNS)
- Colonisation of hard structures
- Sandwave recovery

Having reviewed the updates to the IPMP, we welcome the inclusion of sandwave recovery monitoring. However, we highlight that any mitigation measure to aid the recovery of sandwaves should, where possible, undertake disposal within similar sediment type close to the installation activity and must avoid impacting directly/ indirectly on priority habitats.

We maintain that sandwave recovery monitoring will help to build on the strategic evidence required to understand the regional impacts to sediment transport processes and physical processes caused by the installation of large-scale wind farm developments into the future. Recovery monitoring of sandwaves will support statements made in the submitted documentation that sandbanks will recover in the short-term and will also help to inform future work. We re-iterate our original written representation comments that appropriate survey design and power analysis should be agreed (post consent) and conducted to ensure that adequate data is collected for long term comparisons of the effect of change compared to

baseline data.

#### **4) Marine Mammals**

Natural England notes that the Applicant has included the following monitoring approach for marine mammals:

*“Measurements of underwater sound generated by the installation of the first four piled foundations of each piled foundation type and associated marine mammal monitoring, to be set out in the marine mammal mitigation protocol (MMMP).”*

As set out in our relevant representations C8 and C32, we reiterate that marine mammal monitoring should be carried out in addition to this standard industry monitoring. Detailed requirements for the IPMP can be found in: [Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards Phase IV: Expectations for monitoring and environmental requirements at the post-consent phase](#). This document outlines Natural England’s recommendations for an effective IPMP and should be considered when planning monitoring post-consent. Ideally, this will be a collaborative assessment across the Mona and Morgan Generation projects with a focus on filling evidence gaps for marine mammals in the Irish Sea, with a focus on receptors which are not usually the subject of post-construction monitoring. Natural England would welcome further engagement once the Applicant has proposed further monitoring for Marine Mammals. This could include, but is not limited to, monitoring the impacts of construction for harbour porpoise and bottlenose dolphin. Therefore, we do not consider this to be resolved at deadline 3.

#### **5) Ornithology**

Natural England is supportive of the ExA request (EXQ MO 1.13) for the Applicant to consider the inclusion of monitoring for key ornithology receptors within the IPMP and appropriately secure it within the draft DCO, drawing on SNCB advice. We advise that monitoring should ideally be a collaborative assessment across the Mona and Morgan Generation projects with a focus on receptors which are not usually the subject of post-construction monitoring. For example, Digital Aerial Surveys (DAS) monitoring of manx shearwater displacement from OWF array areas. Natural England would welcome further engagement once the Applicant has proposed ornithological monitoring within the IPMP. Therefore, we will wait until the appropriate deadline to provide further comments on any additional documents provided by the Applicant during examination.