

# MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

## Statement of Common Ground between Morgan Offshore Wind Limited and the Marine Management Organisation

Deadline: 3

Application Reference: EN010136

Document Number: MRCNS-J3303-RPS-10160

Document Reference: S\_D3\_MMO

12 November 2024

F02



Image of an offshore wind farm

**MORGAN 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 Limited	Morgan Offshore Wind Limited	October 2024
F02	Deadline 3	RPS	Morgan Offshore Wind Limited	Morgan Offshore Wind Limited	November 2024

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## MORGAN 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).
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed' marine licence as part of the DCO process.
Morgan Offshore Wind Project	The Morgan Offshore Wind Project is comprised of both the generation assets and offshore and onshore transmission assets, and associated activities.
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 Nationally Significant Infrastructure Projects.

### Acronyms

Acronym	Description
ADD	Acoustic Deterrent Devices
AEOI	Adverse Effect on Integrity
CEA	Cumulative Effects Assessment
CF	Commercial Fisheries
DCO	Development Consent Order
dML	Deemed Marine Licence
EDR	Effective Deterrent Range
EIA	Environmental Impact Assessment
EMF	Electromagnetic fields
ES	Environmental Statement
EWG	Expert Working Group
FLCP	Fisheries Liaison Co-existence Plan
HRA	Habitat Regulation Assessment
INNS	Invasive Non-Native Species
ISAA	Information to Support Appropriate Assessment
iPCoD	Interim Population Consequences of Disturbance
LSE	Likely Significant Effect
MM	Marine Mammals
MMO	Marine Management Organisation

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Acronym	Description
MMMP	Marine Mammal Mitigation Protocol
MMMU	Marine Mammal Management Unit
MCZ	Marine Conservation Zone
MP	Marine Plan
NAS	Noise Abatement Systems
NMFS	Noise Mitigation Systems
NOAA	National Oceanic and Atmospheric Administration
OSP	Offshore Substation Platform
OWF	Offshore Wind Farm
PEIR	Preliminary Environmental Information Report
PSA	Particle size analysis
PTS	Permanent threshold shift
SAC	Special Area of Conservation
SEL	Sound Exposure Level
SNCB	Statutory Nature Conservation Bodies
SoCG	Statement of Common Ground
SSC	Suspended Sediment Concentration
SPL	Sound Pressure Level
UWN	Underwater Noise
UWSMS	Underwater Sound Management Strategy`
UXO	Unexploded ordnance

# **1 STATEMENT OF COMMON GROUND BETWEEN MORGAN OFFSHORE WIND LIMITED AND THE MARINE MANAGEMENT ORGANISATION**

## **1.1 Introduction**

### **1.1.1 Overview**

1.1.1.1 This draft Statement of Common Ground (SoCG) has been prepared between Morgan Offshore Wind Limited (hereafter referred to as ‘the Applicant’) and the Marine Management Organisation (MMO), hereafter referred to together as the parties. The SoCG sets out the areas of agreement and disagreement between the parties in relation to the proposed Development Consent Order (DCO) application for the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as ‘Morgan Generation Assets’).

1.1.1.2 The need for a SoCG between the Applicant and the MMO is set out within the Rule 6 letter that was issued by the Planning Inspectorate on 05 August 2024.

1.1.1.3 This document is intended to provide the Examining Authority with an overview of the level of common ground between the parties. The SoCG will facilitate further discussion between the parties and will be updated during the Morgan Generation Assets Examination and submitted at the Deadlines indicated in the Rule 6 letter (PD-001).

### **1.1.2 Morgan Generation Assets Elements under the MMO’s Remit**

1.1.2.1 The MMO, established by the Marine and Coastal Access Act 2009, is responsible for licensing activities such as construction, deposits, and removals in English waters and Northern Irish offshore waters, and ensures these activities do not adversely impact marine ecosystems or human health. Under the Planning Act 2008, the MMO also advises on projects affecting the marine area, including those deemed under DCOs. The MMO oversees post-consent processes, including monitoring and enforcement, to ensure compliance with marine licence provisions and safeguard the marine environment.

1.1.2.2 The elements of the Morgan Generation Assets which may affect the interests of the MMO are detailed in Schedule 1 (Authorised Project), Part 1 (Authorised Development) of the Draft DCO (Document Reference C1).

1.1.2.3 This SoCG covers the following topics of relevance to the MMO:

- Assessment of effects and mitigations proposed, including cumulative impacts and effects for:
  - Physical processes
  - Benthic ecology
  - Fish and shellfish ecology
  - Marine mammals
- Compliance with Marine Policy Statement and North West Marine Plan 2021
- DCO and Deemed Marine Licence drafting and acceptability of conditions and outline plans
- Coverage and content of outline plan documents submitted with the Application
- Time period secured for review and approval of plans post consent

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- Principles of proposals for safety zone applications (in relation to commercial fisheries)
- Principles for decommissioning.

**1.1.3 Overview of Morgan Generation Assets**

1.1.3.1 Morgan Generation Assets is a proposed offshore wind farm located in the east Irish Sea. The Morgan Generation Assets will include offshore infrastructure and consists of:

- Morgan Array Area: This is where the wind turbines, Offshore Substation Platforms (OSPs), foundations (for both wind turbines and OSPs), inter-array cables and interconnector cables will be located.

**1.1.4 Approach to SoCG**

1.1.4.1 This SoCG was initially developed during the pre-Examination phase and is being progressed during the Examination phase of the Morgan Generation Assets. In accordance with discussions between the parties, the SoCG is focused on those issues raised by the MMO within its response to Scoping, Section 42 consultation and as raised through the Evidence Plan process that has underpinned the pre-application consultation between the parties. This SoCG also includes those issues raised by the MMO during the post-application phase (i.e. relevant representations, written representations, pre-examination meetings and examination meetings).

1.1.4.2 The structure of this SoCG is as follows:

- Section 1.1: Introduction
- Section 1.2: Summary of SoCG
- Section 1.3: Summary of consultation
- Section 1.4: Agreement Log.

**1.2 Summary of SoCG**

**1.2.1 Overview**

1.2.1.1 This SoCG outlines the consultation that has taken place between the parties during the pre-application and post-application phase of the Morgan Generation Assets. The agreement logs present the position reached on 12 November 2024 (Deadline 3).

**1.2.2 Summary of Those Matters Agreed, Ongoing Points of Discussion and Not Agreed**

1.2.2.1 Table 1.1 provides a summary of those matters agreed, an ongoing point of discussion or not agreed between the parties.

**Table 1.1: Summary of areas agreed, ongoing points of discussion and not agreed between the parties.**

Topic	Position
Physical processes	Some items <b>agreed</b> , one ongoing point <b>under discussion</b> .
Benthic ecology	All items <b>agreed</b> .
Fish and shellfish ecology	Some items <b>agreed</b> , some ongoing points <b>under discussion</b> .

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Topic	Position
Marine mammals	Some items <b>agreed</b> , one item not agreed but not material, some ongoing points <b>under discussion</b> .
Commercial Fisheries	All items <b>agreed</b> .
Marine policy, draft DCO and deemed Marine Licence	Some items <b>agreed</b> , some ongoing points <b>under discussion</b> .

### 1.3 Summary of consultation

1.3.1.1 Table 1.2 below provides a summary of the consultation undertaken by the Applicant with the MMO, relevant to physical processes, benthic ecology, fish and shellfish ecology, and marine mammals during the pre-application phases of the Morgan Generation Assets. Table 1.3 below provides a summary of the consultation undertaken by the Applicant with the MMO, relevant to physical processes, benthic ecology, fish and shellfish ecology, and marine mammals during the post-application phases of the Morgan Generation Assets.

**Table 1.2: Summary of pre-application consultation with the MMO.**

Date	Form of consultation	Statutory or non-statutory engagement	Summary of consultation
<b>Scoping</b>			
22/07/2022	Scoping Opinion	Statutory	Response included within Scoping Opinion (APP-030).
<b>Statutory (Section 42) consultation</b>			
02/06/2023	Email	Statutory	The MMO welcomes the progress bp Alternative Energy Investments Limited had made to assess the environmental impacts of the Morgan Offshore Wind Farm (Generation Assets) project. However, the MMO required the points raised in the Section 42 consultation to be addressed within the ES.
<b>Evidence Plan Steering Group</b>			
16/11/2021	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>Introduce and gain feedback on Evidence Plan</li> <li>Identify key contacts and roles and responsibilities</li> <li>Discuss establishment of EWGs and key contacts for these.</li> </ul>
13/12/2021	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>To produce high level feedback on the Offshore Wind Project cable routing process</li> <li>To identify red flags.</li> </ul>
20/07/2022	Meeting	Non-statutory	Approach to HRA Stage 1 Screening.
14/02/2023	Meeting	Non-statutory	HRA Stage 1 Screening and Information to Support Appropriate Assessment (ISAA) methodology.
29/06/2023	Meeting	Non-statutory	Project updates, HRA Stage 1 Screening and ISAA methodology, Section 42 responses and agreement logs.
17/10/2023	Meeting	Non-statutory	Project updates, HRA Stage 1 Screening and ISAA methodology and approach to underwater sound impact management.

### **Benthic ecology, fish and shellfish and physical processed EWG**



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<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
17/02/2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>Introduce and gain feedback on Evidence Plan</li> <li>Discuss stakeholder comments on the survey scopes to date and any further data required</li> <li>Update on the progress of surveys and data analysis.</li> </ul>
01/04/2022	Meeting	Non-statutory	Provision of the benthic survey scope of works.
29/11/2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>Key project updates</li> <li>Presentation of the baseline characterisation and modelling approach</li> <li>Initial outputs of impact assessment.</li> </ul>
14/03/2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>To present the updated baseline characterisation for the Morgan Generation Assets</li> <li>Cumulative assessment approach and initial impact assessment approach to agreement.</li> </ul>
11/07/2023	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>Discussion of statutory consultation responses</li> <li>Updates baselines</li> <li>Agreement log.</li> </ul>
14/08/2023	Meeting	Non-statutory	Provision of a technical note presenting the approach to physical processes modelling for the application.
12/10/2023	Meeting	Non-statutory	To present the updates to the benthic ecology baseline characterisation to address statutory consultation responses. Physical processes and fish and shellfish ecology were not discussed.
07/12/2023	Meeting	Non-statutory	Presentation of the final impact assessment, final mitigation and monitoring requirements and progress to agreement.

**Marine Mammals EWG**

17/02/2022	Meeting	Non-statutory	<ul style="list-style-type: none"> <li>Introduce and gain feedback on Evidence Plan</li> <li>Discuss stakeholder comments on the survey scopes to date (i.e. prior to Evidence Plan) and any further data required</li> <li>Update on the progress of surveys and data analysis.</li> </ul>
19/07/2022	Meeting	Non-statutory	To agree the marine mammal study areas, approach to baseline characterisation and approach to the EIA, including impact scoping.
17/11/2022	Meeting	Non-statutory	To present the baseline characterisation and discuss and agree the approach to the underwater sound assessment and population modelling approach.
09/02/2023	Meeting	Non-statutory	To present the updated baseline characterisation, underwater sound modelling outputs, and cumulative assessment.
29/06/2023	Meeting	Non-statutory	To present the updated assessment and to discuss statutory consultation responses.
10/10/2023	Meeting	Non-statutory	Provision of technical note with approach to addressing outstanding items for agreement.

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<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
05/12/2023	Meeting	Non-statutory	Final impact assessment, final mitigation and monitoring requirements, and progress to agreement.
23/04/2023	Meeting	Non-statutory	To discuss the outline Underwater Sound Management Strategy.

**Table 1.3: Summary of post-application consultation with the MMO.**

<b>Date</b>	<b>Form of consultation</b>	<b>Statutory or non-statutory engagement</b>	<b>Summary of consultation</b>
12/06/2024	Relevant representations	Statutory	Relevant representations of the MMO.
04/09/2024	Meeting	Non-statutory	Meeting to discuss SoCG template.
23/09/2024	Meeting	Non-statutory	Meeting to discuss relevant representations of the MMO and SoCG.
09/10/2024	Meeting	Non-statutory	Meeting to discuss relevant representations of the MMO.
22/10/2024	Written representations	Statutory	Meeting to discuss Written representations of the MMO.
24/10/2024	Meeting	Non-statutory	Meeting to discuss underwater sound matters and to progress the SoCG.
05/11/2024	Meeting	Non-statutory	Meeting to discuss progress on the SoCG.

## 1.4 Agreement log

### 1.4.1 Overview

1.4.1.1 This section of the SoCG sets out the level of agreement between the parties. For each matter the status is identified as being either agreed, not agreed or an ongoing point of discussion, according to the criteria set out in Table 1.4 below.

**Table 1.4: Position definitions and colour coding.**

Position and colour coding	Definition of position
Agreed	The matter is considered to be agreed between the parties.
Ongoing point of discussion	The matter is neither agreed or not agreed, and is a matter where further discussion is required between the parties.
Not agreed, but not material	The matter is not considered to be agreed between the parties, but is not deemed material
Not agreed	The matter is not considered to be agreed between the parties.

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**1.4.2 Physical processes**

1.4.2.1 Table 1.5 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.3) in relation to physical processes.

**Table 1.5: Agreement Log between the parties on physical processes.**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.PP.1	Consultation	The Applicant has undertaken adequate consultation with the MMO on potential impacts on physical processes.	The MMO agrees that the Applicant has undertaken adequate consultation with the MMO on potential impacts to physical processes.	Agreed at Deadline 1
MMO.PP.2	Baseline environment	Agreement on broad approach to characterisation for Physical Processes.	Agreement of data gathered for baseline considered acceptable for assessment.	Agreed at Deadline 1
MMO.PP.3	Assessment methodology	Agreement to the scoping of impacts for the EIA for physical processes.	No objections raised with regards to scope of physical processes.	Agreed at Deadline 1
MMO.PP.4	Assessment methodology	Agreement on physical processes modelling strategy.	No comments from physical processes advisor. Agreement on approach from Fisheries, Fish & Shellfish and Benthic Ecology Advisors.	Agreed at Deadline 1
MMO.PP.5	Assessment of the effects from the project alone and cumulatively	There will be no significant effects on physical processes in EIA terms for the project alone or cumulatively with other plans and projects.	<p>This remains an ongoing point of discussion. Please see comments in section 4.2 of RR-020.</p> <p>The MMO considers that the cumulative assessment is typical of those seen in applications of this type, with the conclusion that there are no significant effects from cumulative impacts for physical processes. This is in Section 1.11 of document F2.1.</p> <p>The inter-related impacts for physical processes are provided in Section 15.6 of F2.15, which mainly consist of the impact of sediment pathway changes to benthic and fish receptors. There were no inter-related significant impacts identified.</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.PP.6	Assessment of the effects from the project cumulatively with other projects	The list of projects screened into the CEA in the EIA are appropriate.	MMO agrees the list of projects screened into the CEA is appropriate.	Agreed at Deadline 1

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**1.4.3 Benthic Ecology**

1.4.3.1 Table 1.6 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.3) in relation to benthic ecology.

**Table 1.6: Agreement Log between the parties on benthic ecology.**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.BE.1	Consultation	The Applicant has undertaken adequate consultation with the MMO on potential impacts on benthic ecology	The MMO agrees that the Applicant has undertaken adequate consultation with the MMO on potential impacts to benthic ecology.	Agreed at Deadline 1
MMO.BE.2	Surveys	There is agreement on the approach to surveys to inform the assessment.	Appropriate data sources have been collated through desktop and site-specific surveys.	Agreed at Deadline 1
MMO.BE.3	Baseline environment	There is agreement on the broad approach to baseline characterisation for Benthic Ecology.	The ES for the Morgan Offshore Wind Farm contains a comprehensive assessment of impacts to benthic ecology receptors and accurate description of the baseline physical and biological environment.	Agreed at Deadline 1
MMO.BE.5	Assessment methodology	There is agreement to the scoping of impacts for the EIA for Benthic Subtidal and Intertidal Ecology.	An assessment of the prevalence / abundance of sediment bound paint flakes pre- and post-construction would further our understanding of this potential impact on benthic ecology. However, the MMO notes that no further assessment of this impact has been proposed. This is in line with other similar developments where Applicants have not been required to undertake additional monitoring or research.  There is an agreement to the scoping of impacts for the EIA for Benthic Subtidal and Intertidal Ecology.	Agreed at Deadline 3

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.BE.6	Baseline environment	The regional benthic subtidal and intertidal ecology study area that was defined in the PEIR is appropriate for the baseline characterisation.	The regional benthic subtidal and intertidal ecology study area that was defined in the PEIR is appropriate for the baseline characterisation.	Agreed at Deadline 1
MMO.BE.7	Baseline environment	Sufficient site-specific and desktop data has been collated to appropriately characterise the baseline benthic subtidal and intertidal ecology environment to inform the EIA.	Appropriate data sources have been collated through desktop and site-specific surveys.	Agreed at Deadline 1
MMO.BE.8	Baseline environment	The correct designated site (i.e. the Menai Strait and Conwy Bay SAC), and appropriate benthic habitat features, have been identified and taken forward for consideration in the EIA and all other designated sites (including MCZs) with benthic features fall outside the Zol and do not require assessment.	The MMO defers to NE and other relevant Statutory Nature Conservation Bodies regarding the impacts of the proposed Morgan OWF on the conservation features of designated protected areas that may be impacted by the proposed development. However, the MMO notes that the Applicant has identified no potential pathways, and the 10 Marine Conservation Zones considered in the screening report have been screened out with justification (Document Ref E2).	Agreed at Deadline 1
MMO.BE.9	Baseline environment	It is appropriate to scope out accidental pollution from the benthic subtidal and intertidal ecology chapter (noting that effects from the release of bentonite (a chemically inert, natural clay) are assessed in the increased in SSC and sediment deposition impact pathway).	The MMO has no concerns regarding the scoping out of accidental pollution during construction, operations and maintenance and decommissioning due to the Applicant's commitment to implement industry good practice standards (International Convention for the Prevention of Pollution from Ships) and adherence to the plans set out in the Environmental Monitoring Plan and Marine Pollution Contingency Plan. The likelihood of an accidental spill is therefore low, and the measures put in place will act to prevent an increase in the magnitude of any spill.	Agreed at Deadline 1

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.BE.10	Assessment methodology	<p>Noting the clarification points bulleted below, the potential impacts assessed represent a comprehensive list of potential effects on benthic ecology from the Morgan Offshore Wind Project.</p> <ul style="list-style-type: none"> <li>- Habitat alteration/physical change to another sediment type is fully described and assessed in the assessment of long term habitat loss.</li> <li>- Secondary scour is scoped out of Volume 2, Chapter 1: Physical processes and an assessment is therefore no required in the benthic chapter</li> <li>- Impacts associated with the removal of marine growth from foundations during the maintenance phase spans several impact pathways. As such this impact has been considered within two impact pathway assessments: 1) increased SSC and sediment deposition (i.e. in relation to the deposition and smothering element) and 2) in the assessment of the introduction of artificial structures and the potential for this to extend the reef effect in the vicinity of foundations.</li> </ul>	<p>The ES for the Morgan Offshore Wind Farm contains a comprehensive assessment of impacts to benthic ecology receptors and accurate description of the baseline physical and biological environment.</p>	Agreed at Deadline 1
MMO.BE.11	Assessment of the effects from the project alone	<p>The list of projects screened into the CEA in the EIA are appropriate.</p>	<p>The ES for the Morgan Offshore Wind Farm contains a comprehensive assessment of impacts to benthic ecology receptors and accurate description of the baseline physical and biological environment in relation to the CEA.</p>	Agreed at Deadline 1



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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.BE.12	Assessment of the effects from the project cumulatively with other projects	The impact pathways assessed for benthic subtidal ecology (intertidal detailed separately) will not result in significant effects in EIA terms given the implementation of the measures adopted as part of Morgan Offshore Wind Project.	The ES for the Morgan Offshore Wind Farm contains a comprehensive assessment of impacts to benthic ecology receptors and accurate description of the baseline physical and biological environment.	Agreed at Deadline 1
MMO.BE.13	Assessment of the effects from the project cumulatively with other projects	No cumulative effects that are significant in EIA terms are predicted.	The ES contains an adequate assessment of cumulative effects and inter-related impacts in Section 2.1 and 2.11.	Agreed at Deadline 1
MMO.BE.14	Mitigation	The measures adopted as part of the Morgan Offshore Wind Project are sufficient and no additional measures are necessary as a result of the assessment conclusions.	Mitigation measures are summarised alongside potential environmental effects and monitoring proposals, specific to benthic ecology receptors, in Table 2.36 (Volume 2, Chapter 2: Benthic subtidal ecology) of the ES and the MMO agrees with the measures set out with regard to benthic ecology.	Agreed at Deadline 1

**HRA**

MMO.BE.15	Assessment methodology	The approach used for determining LSE on European sites with Annex I habitats as features is appropriate and that all sites within the zone of influence of indirect effect from SSC and changes in physical processes have been identified (noting that the Dee Estuary SAC falls outside the Zol and will be screened out of the LSE screening for the final application).	The MMO defers to comments from Natural England and other SNCB's regarding HRA. The MMO will maintain a watching brief of NE and other SNCB response.	Agreed at Deadline 1
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**1.4.4 Fish and shellfish ecology**

1.4.4.1 Table 1.7 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.3) in relation to fish and shellfish ecology.

**Table 1.7: Agreement Log between the parties on fish and shellfish ecology**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.FSF.1	Consultation	The Applicant has undertaken adequate consultation with the MMO on potential impacts on fish and shellfish ecology	The MMO agrees that the Applicant has undertaken adequate consultation with the MMO on potential impacts to fish and shellfish ecology.	Agreed at Deadline 1
MMO.FSF.2	Baseline environment	There is agreement on the broad approach to characterisation for Fish and Shellfish Ecology.	The Applicant's broad approach to characterisation of the baseline environment for fish and shellfish is appropriate (RR-020.67).	Agreed at Deadline 3
MMO.FSF.3	Assessment methodology	There is agreement to the scoping of impacts for the EIA for Fish and Shellfish Ecology.	The MMO is generally content with the impacts which have been scoped out of further assessment. The MMO does not consider that the Applicant has omitted to assess an impact which they should have.	Agreed at Deadline 1
MMO.FSF.4	Assessment methodology	There is agreement on the approach to noise modelling and approach to assessment following clarifications provided in EWG.	The MMO is content that the MDS for impacts to fish receptors from UWN as a result of piling is appropriate (RR-020.48-54). Clarifications were requested with regard to the UWN assessment which is necessary for determining the severity and range of impact to spawning herring and cod from piling noise produced by the project. These were highlighted in RR-020.  The required clarifications of the MDS have now been provided.	Agreed at Deadline 3
MMO.FSF.5	Baseline environment	The fish and shellfish ecology study area that was defined in the PEIR is appropriate for the baseline characterisation.	The MMO have requested that for shellfish species mapped scallop grounds are included in spawning maps for the characterisation of the baseline environment.	Ongoing point of discussion updated at Deadline 3

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.FSF.6	Baseline environment	The characterisation of herring spawning potential is sufficient to inform the EIA, with the caveat that additional heat mapping of herring larval data is presented for the Environmental Statement, that PSA data is presented for the Environmental Statement to allow for data cross-checking by stakeholders and that additional PSA sample data is extracted from the Cefas OneBenthic tool for the project region to provide a wider context regarding substrate suitability.	The MMO is content with the Applicant's conclusion that seabed sediments within the Morgan Array area are generally not high-value as herring spawning habitat, and that the area to the north of the Morgan boundary has been appropriately recognised by the Applicant as a herring spawning ground. The MMO does not consider that further action is necessary (RR-022.66).	Agreed at Deadline 3
MMO.FSF.7	Baseline environment	The characterisation of sandeel potential is sufficient to inform the EIA with the caveat that PSA data is presented for the Environmental Statement to allow for data cross-checking by stakeholders and that additional PSA sample data is extracted from the Cefas OneBenthic tool for the project region to provide a wider context regarding substrate suitability.	The MMO agrees that the characterisation of sandeel potential habitat is sufficient to inform the EIA. Effects of temporary habitat loss and physical disturbance to sandeel habitat may occur during construction of the wind farm, although this will likely be limited to the area where suitable sediments are located. Although the evidence presented thus far shows that the Morgan Array area overlies a matrix of preferred, marginal, as well as some unsuitable sediment types for sandeel, given the wider availability of seabed substrates that are suitable as sandeel habitat outside the array area, the MMO is content that the magnitude of temporary habitat loss and physical disturbance during construction of the wind farm is unlikely to result in significant adverse effects on sandeels in the area.  The Applicant's broad approach to characterisation of the baseline environment for fish and shellfish is appropriate (RR-022.67).	Agreed at Deadline 3
MMO.FSF.8	Baseline environment	The correct designated sites and appropriate fish and shellfish ecology features have been identified within the baseline characterisation and considered where appropriate in the EIA.	No objections raised regarding the designated sites presented with relevant fish features within the PEIR and prior/subsequent Expert Working Group meetings.	Agreed at Deadline 1

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.FSF.9	Assessment of the effects from the project alone and cumulatively	There will be no adverse effects on integrity for SACs designated for fish features for any impacts for the project alone or in combination.	<p>The mapped noise contours of between 120dB and 150dB overlap the SACs in the vicinity of the project. Whilst I appreciate that these values fall below the 186dB SEL<sub>cum</sub> threshold for TTS in fish, given that there is considerable uncertainty with the UWN modelling provided at this stage, SACs with fish as designated features should not be screened out of further assessment until the necessary clarifications with the UWN modelling, and assessment have been resolved.</p> <p>The MMO is generally content that the Applicant's CEA is sufficiently precautionarily and supports their conclusion of a predicted moderate adverse effect for sound-sensitive species, cod and herring, which is significant in EIA terms and requiring mitigation (RR-022.64).</p>	Agreed at Deadline 3
MMO.FSF.10	Assessment of the effects from the project alone and cumulatively	On the basis that there is no direct overlap with fish features of MCZs of sound contours with the potential to cause injury or behavioural responses, there will be no risk of hindering conservation objectives of any MCZs with fish features (from underwater sound or any other impacts).	<p>The mapped noise contours of between 120dB and 150dB appear to overlap the Wyre Lune and Ribble Estuary MCZs. Whilst I appreciate that these values fall below the 186dB SEL<sub>cum</sub> threshold for TTS in fish, given that there is considerable uncertainty with the UWN modelling provided at this stage, MCZs with fish as designated features should not be screened out of further assessment until the necessary clarifications with the UWN modelling, and assessment have been resolved.</p> <p>The MMO is generally content that the Applicant's CEA is sufficiently precautionarily and supports their conclusion of a predicted moderate adverse effect for sound-sensitive species, cod and herring, which is significant in EIA terms and requiring mitigation (RR-022.64).</p>	Agreed at Deadline 3
MMO.FSF.11	Assessment of the effects from the	For all impacts, other than underwater sound, no significant effects on fish and shellfish receptors are predicted for the project alone and cumulatively.	Agreed, other than UWN we would not expect significant impacts to fish receptors. The impacts of UWN on cod and herring should form the	Agreed at Deadline 3

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
	project alone and cumulatively		<p>focus of the assessment along with designated Annex II fish species. The MMO will provide an update in due course.</p> <p>The MMO is generally content that the Applicant's CEA is sufficiently precautionarily and supports their conclusion of a predicted moderate adverse effect for sound-sensitive species, cod and herring, which is significant in EIA terms and requiring mitigation (RR-022.64).</p>	
MMO.FSF.12	Mitigation	Measures adopted as part of the project are appropriate and agreed to ensure significant effects are avoided, other than underwater sound.	<p>Yes, the tertiary mitigation measures presented by the Applicant seem sufficient to prevent significant effects on fisheries receptors and are as follows:</p> <ul style="list-style-type: none"> <li>• Development and adherence to a Cable Specification and Installation Plan to minimise the impacts of EMF to fish receptors,</li> <li>• a minimum cable burial depth of 1.5m.</li> <li>• Development of, and adherence to, an offshore Environmental Management Plan to reduce the potential impacts of any pollution events.</li> <li>• Actions to minimise Invasive Non-Native Species (INNS), including a biosecurity plan to limit spread and introduction of INNS,</li> <li>• Offshore Environmental Management Plan will be issued to all Project vessel operators to prevent collisions with megafauna.</li> <li>• It should be noted that for the impacts of UWN the use of piling soft-start and ramp-up measures will likely not be sufficient to avoid all significant impacts to fish receptors.</li> </ul> <p>As there are still uncertainties in the UWN modelling and assessment presented in the ES, the MMO has recommended that seasonal piling restrictions be implemented to prevent significant</p>	Ongoing point of discussion

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
			<p>disruption to spawning cod and herring, and their eggs and larvae, during their sensitive spawning seasons. This is to remain open until an agreement has been made.</p> <p>The MMO notes that the UWSMS is a live document which will be updated through discussions with stakeholders, and, if NAS is required, will include this detail clearly in the final MMMP and UWSMS.</p>	
MMO.FSF.13	Mitigation	The approach to underwater sound modelling, including soft starts and ramp ups is appropriate for reducing injury effects on some fish and shellfish receptors (not applicable to behavioural effects). Noting that these will not be effective for all fish and shellfish receptors and that this mitigation is not necessary to rule out significant injury effects on fish and shellfish receptors.	The MMO agrees that modelling including soft starts and ramp ups is fairly standard and agrees that this approach is acceptable. However, there are still a number of issues relating to the modelling and this point remains ongoing.	Ongoing point of discussion
MMO.FSF.14	Assessment methodology	The approach to underwater sound modelling based on presentation of both static receptors and those moving away from the source is appropriate.	<p>The MMO does not support the use of a fleeing receptors. Modelling for fish should be based on a static receptor. The Applicant is welcome to model both, however only the impacts to the static receptor will be seen as relevant.</p> <p>MMO would like seasonal restriction on face of licence with a clause that this can be removed should sufficient evidence be provided through the UWSMS. The MMO will provide further information on area that seasonal restrictions may need to be applied.</p>	Ongoing point of discussion
MMO.FSF.15	Assessment methodology	Cod and herring should be considered of high sensitivity to underwater sound.	The MMO maintain that cod should be classed as high sensitivity to underwater sound.	Agreed at Deadline 1
MMO.FSF.16	Assessment of the effects from the project alone and cumulatively	For piling impacts, no significant effects are predicted on fish and shellfish receptors, other than cod and herring during the spawning period.	The MMO is reviewing the documents and will provide an update in due course. The MMO have requested evidence of underwater sound assessment on scallop.	Ongoing point of discussion

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.FSF.17	Mitigation	For piling impacts, although a significant effect (in EIA terms) is predicted on herring and cod spawning, any such effects will be managed and avoided through measures set out in the Underwater Sound Management Strategy (UWSMS), which will be agreed with stakeholders post consent.	The MMO is of the opinion that it is acceptable for the UWSMS to be developed and mitigation options to be explored post-consent, with input from stakeholders, but the requested piling restrictions for cod and herring must be conditioned onto the dML as a minimum and should only be varied or amended once satisfactory evidence that the range of impact from UWN has been reduced is provided for review and deemed acceptable (1.1.9 of REP2-209).	Ongoing point of discussion
MMO.FSF.18	Assessment of the effects from the project cumulatively with other projects	The list of projects screened into the CEA in the EIA are appropriate.	The MMO is content with this.	Agreed at Deadline 1
<b>HRA</b>				
MMO.FSF.19	Assessment methodology	The approach used for determining LSE on European sites with Annex II diadromous fish as features is appropriate and that all the relevant sites have been identified.	The MMO defers to Natural England regarding HRA, who have confirmed no or negligible impacts to Annex II fish species.	Agreed at Deadline 3

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**
**1.4.5 Marine mammals**

1.4.5.1 Table 1.8 sets out the level of agreement between the parties for each relevant component of the application (as identified in section 1.1.1.3) in relation to marine mammals.

**Table 1.8: Agreement Log between the parties on marine mammals.**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.MM.1	Consultation	The Applicant has undertaken adequate consultation with the MMO on potential impacts on marine mammals	The MMO agrees that the Applicant has undertaken adequate consultation with the MMO on potential impacts to marine mammals.	Agreed at Deadline 1
MMO.MM.2	Baseline environment	There is agreement on the aerial surveys with respect to marine mammals; in particular use of an appropriate buffer around the Morgan Array Area.	This meeting took place before the MMO had a DCO in place, so the MMO cannot retrospectively agree. No further action required.	Not agreed – but not material.
MMO.MM.3	Baseline environment	The approach to the baseline characterisation is appropriate.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.4	Assessment methodology	Agreement on approach to noise modelling following clarifications provided in EWG.	The MMO supports the dual metric approach for assessing auditory injury in marine mammals. Both the peak sound pressure level (peak SPL) and the cumulative sound exposure level (SEL <sub>cum</sub> ) ranges should be presented.  For the assessment of UXO clearance, the peak SPL, as in the NOAA (NMFS, 2018) and Southall et al. (2019) guidance, is the correct metric to use for instantaneous PTS.	Agreed at Deadline 1
MMO.MM.5	Assessment methodology	Agreement that the Celtic and Irish Sea (HP MMMU) is an appropriate study area for dolphin and minke whale.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.6	Assessment methodology	Agreement on approach to densities and reference populations - harbour porpoise.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.7	Assessment methodology	Agreement on approach to densities and reference populations - grey seal.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1



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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.MM.8	Assessment methodology	Agreement on approach to densities and reference populations - bottlenose dolphin.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.9	Assessment methodology	Agreement on approach to densities and reference populations - Risso's dolphin, short beaked dolphin, minke whale.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.10	Assessment of the effects from the project alone	Other than UXO impacts, there will be no significant effects on marine mammal receptors in EIA terms for the project alone.	Full details of the updated noise modelling and proposed mitigation will need to be reviewed before agreement is reached.  Following meeting on 24/10/2024 the MMO will review if any further information is required and if this point can be agreed.	Ongoing point of discussion
MMO.MM.11	Assessment of the effects from the project alone	Other than piling and UXO impacts, there will be no significant effects on marine mammal receptors in EIA terms for the project cumulatively.	Full details of the updated noise modelling and proposed mitigation will need to be reviewed before agreement is reached.  Following meeting on 24/10/2024 the MMO will review if any further information is required and if this point can be agreed.	Ongoing point of discussion
MMO.MM.12	Assessment of the effects from the project cumulatively with other projects	Other than piling impacts, there will be no adverse effects on integrity on SACs with marine mammal features for the project in-combination with other plans and projects.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.13	Mitigation	For UXO impacts, although a significant effect (injury) on harbour porpoise is predicted any such effects will be managed and avoided through measures set out in the MMMP, which will be agreed with stakeholders post consent.	Full details of the updated / finalised noise modelling and proposed mitigation will need to be reviewed.  Following meeting on 24/10/2024 the MMO will review if any further information is required and if this point can be agreed.	Ongoing point of discussion
MMO.MM.14	Mitigation	For piling impacts, although a significant cumulative effect (in EIA terms) is predicted on bottlenose dolphin, any such effects will be managed and avoided through measures set out in the Underwater	The MMO defers to Natural England and the other relevant SNCBs. As the Underwater Sound Management Strategy has a separate line in Table 1.10 of this document, this has been agreed for bottlenose dolphins.	Agreed at Deadline 1

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
		Sound Management Strategy, which will be agreed with stakeholders post consent.		
MMO.MM.15	Mitigation	The mitigation and management measures are appropriate to ensure all other significant effects and AEOI are avoided for marine mammal receptors, including the Measures to Minimise Impacts to Marine Mammals and Rafting Birds.	The MMO defers to Natural England and the other relevant SNCBs. This is to remain open to ensure all impacts relating to the dML or relevant plans are adequately shown.  Following meeting on 24/10/2024 the MMO will review if any further information is required and if this point can be agreed.	Ongoing point of discussion
MMO.MM.16	Assessment of the effects from the project cumulatively with other projects	Agreement on the CEA screening area for site investigation surveys and use of a maximum number of site investigation surveys occurring concurrently.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.17	Assessment of the effects from the project cumulatively with other projects	Agreement on presenting a 6-year time step in the iPCoD model, assessing temporal maximum design scenario and to add in additional cumulative projects.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1
MMO.MM.18	Assessment methodology	Approach to present both with and without ADD and to base the conclusions of the assessment on the impacts which take into account any designed-in measures, including the use of ADDs.	Content for the assessment to present the benefits of using an ADD, as long as the worst-case ranges (i.e., no ADD) are clearly presented and considered. This will be managed through the MMMP. A line in Table 1.10 is opened for the information within the MMMP so this line can be closed.	Agreed at Deadline 1

**HRA**

MMO.MM.19	Assessment methodology	Agreement on the use of the area-based approach for HRA based on Effective Deterrent Range (EDR) and 143 dB threshold.	The use of an unweighted threshold of 143 dB re 1µPa relates to harbour porpoise only. For all other marine mammal species considered in HRA the NMFS level-B harassment threshold of 160 dB SPL <sub>rms</sub> will be applied for piling alongside the relevant EDR (NMFS, 2005). Please note that thresholds based on the SPL <sub>rms</sub> are not	Agreed at Deadline 1
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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
			appropriate for impulsive sources such as percussive pile driving – the appropriate metric is the SEL <sub>ss</sub> (single strike Sound Exposure Level).	
MMO.MM.20	Assessment methodology	Agreement on approach to LSE Screening for Marine Mammals.	The MMO defers to Natural England and the other relevant SNCBs.	Agreed at Deadline 1

**1.4.6 Commercial fisheries**

**Table 1.9 Agreement Log between the parties on commercial fisheries**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.CF.1	Consultation	The Applicant has undertaken adequate consultation with commercial fisheries operators on potential impacts on commercial fisheries.	The MMO defers to the National Federation of Fishermen's Organisations along with standalone representatives on matters of commercial fisheries.	Agreed at Deadline 1

**MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS**

**1.4.7 Marine policy, draft DCO and deemed Marine Licence**

**Table 1.10 Agreement Log between the parties on marine policy, draft DCO and dML**

Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
<b>EIA</b>				
MMO.MP.1	Assessment methodology	<p>The Planning Statement (APP-074) has regard to the relevant policies of the North West Offshore Marine Plan and how the proposed development accords with it.</p> <p>The Applicant has provided the requested table at Deadline 2 (REP2-006).</p>	<p>The MMO notes that the Applicant has reviewed policies throughout the ES. The MMO requests a table with all Marine Plan policies and how the project complies with these to be included as an addendum to enable a full review of all policies in one location. This will also assist the ExA in reviewing the compliance of the marine plans.</p> <p>The MMO will review the requested table submitted at Deadline 2 (REP2-006) by the Applicant and provide comments in due course.</p>	Ongoing point of discussion
MMO.MP.2	<p>Consenting – DCO/DML</p> <p>Unexploded Ordnance – investigations and clearance</p>	<p>The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.</p> <p>The Applicant shall update the dMLS within the draft DCO to separate out UXO clearance as a specific authorised activity under paragraph 2.</p>	<p>The MMO's general position is that UXO activities are sought within a separate marine licence due to the nature of the impacts. The MMO is currently discussing the inclusion of the UXO clearance within the dML and will provide further comments in due course. The MMO is content for the UXO investigation activities to be included and recommend this is a clearly identifiable activity within the dML (RR-020.5).</p>	Ongoing point of discussion
MMO.MP.3	<p>Consenting – DCO/DML</p> <p>Arbitration</p>	<p>The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate and Article 13 does not need to be included within the draft DCO for the Proposed Development.</p>	<p>The MMO welcomes the update to the draft DCO (RR-020.6-8).</p>	Agreed at Deadline 3
MMO.MP.4	<p>Consenting – DCO/DML</p> <p>Transfer of Benefit of the Order</p>	<p>The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.</p>	<p>The MMO objects to the provisions relating to the process of transferring and/or granting the deemed marine licences set out in the draft DCO at Article 7 (RR-020.9-16 and section 2 of REP2-029).</p>	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.MP.5	<u>Consenting – DCO/DML</u> <u>Use of 'Maintain' and 'Materially'</u>	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO strongly considers that the activities authorised under the DCO and dML should be limited to those that are EIA assessed within the ES, and the statement that activities should be updated to 'do not give rise to any new or different environmental effects to those assessed in the environmental information'. This also applies to the definition of "maintain" (RR-020.17-23 and section 2 of REP2-029).	Ongoing point of discussion
MMO.MP.6	Consenting – DCO/DML Schedules 3 and 4	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	Please see Section 2 of the MMO Deadline 2 submission regarding the provisions of section 72. The MMO does not agree with the Applicant's response (RR-020.24-25 and section 2 of REP2-029).  The MMO notes that the Applicant informed the MMO during a meeting dated 21 October 2024 that Paragraph 9 will be amended as requested. The MMO will review the updated dML once submitted and if updated would consider this point to be resolved.	Ongoing point of discussion
MMO.MP.7	Consenting – DCO/DML Determination Dates	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.  The Applicant will continue to engage with the MMO to seek to agree the stated timescales within conditions for review and approval of documents and plans.	The MMO acknowledges the Applicant's response to RR.020.26. The MMO believes a timescale to discharge a document is inappropriate. The MMO is open to discussions on which documents must be six months and which documents could be four months to take into account the concerns that the Applicant may have. The MMO will continue to work with the Applicant to advise on any plans or documents that could have a four-month timescale (RR-020.26-27).	Ongoing point of discussion
MMO.MP.8	Consenting – DCO/DML Condition 13(3)	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.  The Applicant confirms that it updated each dML at Deadline 2 to reflect the MMO's preferred wording.	The MMO requests that the word 'substantially' is removed from this condition as it is not required. The MMO notes this request to amend condition wording has been actioned (RR-020.28).	Agreed at Deadline 3.
MMO.MP.9	Consenting – DCO/DML Condition 13(4)	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO is content with the updated text in the draft DCO regarding Condition 13(4) (RR-020.29).	Agreed at Deadline 3

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.MP.10	Consenting – DCO/DML Condition 15(11)	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO is content with the updated wording for condition 15(11) (RR-020.30).	Agreed at Deadline 3
MMO.MP.11	Consenting – DCO/DML Adaptive Management	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO has noted the Applicant's comments and although the condition was included due to 'the impact of that project on sensitive habitats and species.', if any monitoring shows an impact higher than predicted within the Environmental statement the MMO may require additional monitoring or mitigation at the post consent stage.  See RR-020.31 for condition wording.  The MMO has noted the Applicants response to this relevant representation and will review the monitoring requirements and conditions and provide further updates in due course.	Ongoing point of discussion
MMO.MP.12	Consenting – DCO/DML Provisions on Variations and Approvals	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO has noted the Applicants response provided to relevant representation RR-020.32 which they will review and provide comments on in due course.	Ongoing point of discussion
MMO.MP.13	Consenting – DCO/DML Force Majeure	The Applicant considers the content of the draft DCO and deemed Marine Licence to be appropriate.	The MMO welcomes the applicant's comments regarding Force Majeure in point RR-020.33 of document PD1-017 regarding the Applicant's response to Relevant Representations. The MMO is currently reviewing the Applicant's comment and will provide a response in due course.	Ongoing point of discussion
MMO.MP.14	Consenting - Plans	Outline fisheries liaison and co-existence plan. The Applicant will ensure the Final FLCP makes it clear the MMO will not act as an arbitrator.	The MMO requests this plan is updated to make it clear that the MMO will not act as arbitrator in regard to compensation and will not be involved in discussions on the need for or amount compensation being issued.  The MMO will review the final plan (RR-020.96).	Agreed at Deadline 3

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.MP.15	Consenting - Plans	Offshore in-principle monitoring plan. The Applicant can confirm that, should the monitoring related to INNS as outlined in the Offshore in-principle monitoring plan (REP2-013) detect the presence of INNS, the Applicant will commit to considering the feasibility of collecting samples of the communities colonising the seabed infrastructure for further analysis of INNS.	The MMO welcomes the Applicant's commitment to review suitable imagery acquired during monitoring related to maintenance activities for the presence of Invasive Non-Native Species (INNS). The MMO requests that the Applicant reconsiders the collection of samples to: 1) confirm species identification; 2) understand the fouling assemblage more fully to include cryptic INNS.	Agreed at Deadline 3
MMO.MP.16	Consenting - Plans	Morgan Array Area site characterisation report	The MMO is reviewing this alongside the information submitted at Procedural Deadline 1 (PD1) and will provide comments in due course.	Ongoing point of discussion
MMO.MP.17	Consenting - Plans	Outline offshore written scheme of investigation for archaeology	The MMO defers to Historic England on the information within this plan.	Agreed at Deadline 1
MMO.MP.18	Consenting - Plans	Measures to minimise disturbance	The MMO defers to Natural England and the other relevant SNCBs. This is to remain open to ensure all impacts relating to the dML or relevant plans are adequately shown.	Ongoing point of discussion
MMO.MP.19	Consenting - Plans	Outline vessel traffic management plan	The MMO defers to Maritime and Coastguard Agency and relevant stakeholders. This is to remain open to ensure all impacts relating to the DML or relevant plans are adequately shown.	Ongoing point of discussion
MMO.MP.20	Consenting - Plans	Outline offshore operations and maintenance plan	The MMO is still reviewing this document and will provide comments in due course.	Ongoing point of discussion
MMO.MP.21	Consenting	Coverage and content of mitigation measures within the outline Marine Mammal Mitigation Protocol (MMMP) is appropriate.	The MMO requests that NAS (bubble curtain) is required for ALL high order clearance, and it is in the interest of the Applicant to plan for this at the earliest opportunity. MMO confirmed at a meeting on 24/10/2024 that they will look at the UWSMS and information provided by the Applicant and confirm if any amendments or additional information is required to close this issue. MMO response to be provided at Deadline 3.	Ongoing point of discussion

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Reference Number	Discussion point	Applicant's Position	The MMO's Position	Status
MMO.MP.22	Consenting	The Underwater Sound Management Strategy, in principle, is an appropriate mechanism to mitigate underwater sound for fish and marine mammals.	<p>The MMO requests that NAS (bubble curtain) is required for ALL high order clearance, and it is in the interest of the Applicant to plan for this at the earliest opportunity.</p> <p>MMO confirmed at a meeting on 24/10/2024 that they will look at the UWSMS and information provided by the Applicant and confirm if any amendments or additional information is required to close this issue. MMO response to be provided at Deadline 3.</p>	Ongoing point of discussion
MMO.MP.23	Consenting	Coverage and content of mitigation measures within the Underwater Sound Management Strategy is appropriate.	<p>The MMO is of the opinion that it is acceptable for the UWSMS to be developed and mitigation options to be explored post-consent, with input from stakeholders (1.1.9 of REP2-209).</p> <p>MMO confirmed at a meeting on 24/10/2024 that they will look at the UWSMS and information provided by the Applicant and confirm if any amendments or additional information is required to close this issue. MMO response to be provided at Deadline 3.</p>	Ongoing point of discussion
MMO.MP.24	Consenting	The principles of proposals for decommissioning are appropriate.	At this time, the MMO is content with the proposals for decommissioning. The MMO is part of wider industry decommissioning discussions and updates may be required during this Examination.	Ongoing point of discussion