



Application by Morgan Offshore Wind Limited Morgan Offshore Wind Project: Generation Assets

The Examining Authority's written questions and requests for information (ExQ2) Issued on Thursday 19 December 2024

The following table sets out the Examining Authority's (ExA) further written questions and requests for information – ExQ2.

Questions are set out using an issues-based framework derived from the Initial Assessment of Principal Issues provided as Appendix C to the [Rule 6 letter](#) of 5 August 2024. Questions have been added to the framework of issues set out there as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference which starts with a prefix for the relevant topic and then has a number 2 (indicating that it is from ExQ2) and a question number within the topic. For example, the first question on Cross-Topic, General and Miscellaneous issues is identified as GEN 2.1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact morganoffshorewindproject@planninginspectorate.gov.uk and include 'Morgan OWF – ExQ2' in the subject line of your email.

Responses are due by Deadline 5: Thursday 16 January 2025



Abbreviation	Description	Abbreviation	Description
AEoI	Adverse Effects on Integrity	IP	Interested Party
BAE	British Aerospace	IPMP	In-Principle Monitoring Plan
CAA	Civil Aviation Authority	JNCC	Joint Nature Conservation Committee
CEA	Cumulative Effects Assessment	km	Kilometre
CMS	Construction Method Statement	m	Metre
CNP	Critical National Priority	MCA	Maritime and Coastguard Agency
DAERA	(Northern Ireland) Department of Agriculture, Environment and Rural Affairs	MGN	Marine Guidance Note
DCO	Development Consent Order	MMMP	Marine Mammal Mitigation Protocol
DML	Deemed Marine Licence	MMO	Marine Management Organisation
EIA	Environmental Impact Assessment	MOD	Ministry of Defence
EMP	Environmental Management Plan	NAS	Noise Abatement Systems
ES	Environmental Statement	NATS	National Air Traffic Service
ExA	Examining Authority	NFFO	National Federation of Fishermen's Organisations
FLCP	Fisheries Liaison and Co-existence Plan	NPS	National Policy Statement
HPAI	Highly Pathogenic Avian Influenza	NPS EN-1	Overarching National Policy Statement for Energy
HRA	Habitats Regulations Assessment	NPS EN-3	National Policy Statement for Renewable Energy Infrastructure
IoM	Isle of Man	NRA	Navigational Risk Assessment
IoMSPC	Isle of Man Steam Packet Company	NRW	Natural Resources Wales
INNS	Invasive Non-Native Species	NSIP	Nationally Significant Infrastructure Project



Abbreviation	Description	Abbreviation	Description
OWF	Offshore Wind Farm	SNCB	Statutory Nature Conservation Body
PIANC	World Association for Waterborne Transport Infrastructure	SPA	Special Protection Area
REWS	Radar Early Warning System	SSSI	Site of Special Scientific Interest
RIES	Report on the Implications for European Sites	TSC	Territorial Sea Committee
RSPB	Royal Society for the Protection of Birds	UK	United Kingdom
SAC	Special Area of Conservation	UXO	Unexploded Ordnance
SAR	Search and Rescue	VHF	Very High Frequency
SFF	Scottish Fishermen's Federation	VTMP	Vessel Traffic Monitoring Plan
SoCG	Statement of Common Ground	WCSP	West Coast Sea Products
SMZ	Scallop Mitigation Zone	WSI	Written Scheme of Investigation

The Examination Library

References in these questions set out in square brackets (eg [APP-010]) are to documents catalogued in the [Examination Library](#). It will be updated as the examination progresses.

Citation of Questions

Questions in this table should be cited as the issue reference then the question number (for example, *ExQ2 GEN2.1* refers to the first question in this table).



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ExQ2	Question to:	Question:
GEN Cross-Topic, General and Miscellaneous Questions		
GEN 2.1	Applicant	<p>Errata and Additional Documents</p> <p>Further to your response to the Examining Authority's (ExA) first written question (ExQ1) GEN 1.1 [REP3-006], provide a list of application documents which are to be updated or appended to at Deadlines (D) 5 and 6.</p>
GEN 2.2	Applicant	<p>Other licences and consents</p> <p>Provide an update on other licences and consents required should a Development Consent Order (DCO) be made, including comments on any concerns raised during consultation and ongoing discussions.</p>
GEN 2.3	Applicant Interested Parties	<p>National Policy, Guidance and Legislation</p> <p>The Applicant and Interested Parties are asked to provide comment on further updates or changes to UK and Isle of Man Government legislation, policy or guidance relevant to the determination of this application that have been issued since submission of the application. Provide a summary of the implications, if any, for the Examination.</p> <p>Note: such updates include but are not limited to the National Planning Policy Framework published on 12 December 2024, the Clean Power 2030 Action Plan published on 13 December 2024, and other recently published Ministerial statements and policy papers.</p>
GEN 2.4	Applicant	<p>Good environmental status</p> <p>Provide an explanation, as set out in paragraph 2.8.109 of National Policy Statement (NPS) EN-3, how the Proposed Development has had regard to Good Environmental Status under the UK Marine Strategy.</p>
GEN 2.5	Maritime & Coastguard Agency Marine Management Organisation	<p>Outline Environmental Management Plan</p> <p>The Maritime and Coastguard Agency (MCA) and Marine Management Organisation (MMO) are area asked to confirm satisfaction with the Outline Environmental Management Plan (EMP) [REP4-018], or if not satisfied, provide comments clarifying why not. This should be included in the respective Statements of Common Ground (SoCG).</p>
GEN 2.6	Applicant	<p>Inter-related effects: displacement of fishing activity into other areas</p>

ExQ2	Question to:	Question:
		The Applicant is asked to signpost and clarify how its inter-related effects assessment takes account of displacement of fishing activity into other areas where other fishing is already having environmental impact.
GEN 2.7	Applicant	<p>Inter-related effects: socio-economic and environmental impacts of ferry route deviations</p> <p>The Applicant is asked how it is to resolve the ongoing point of discussion noted in the SoCG with the UK Chamber of Shipping (CoS) [REP3-025] in which the CoS maintains that the Applicant has not undertaken adequate analysis of the socio-economic impact on shipping sector nor engagement on environmental impact for shipping and navigation consequential on deviation of routeing.</p>
GEN 2.8	Applicant Moor Vannin Offshore Wind Farm Limited	<p>SoCG with Moor Vannin Offshore Wind Farm Limited</p> <p>The Applicant is requested to submit by D5 a SoCG with Moor Vannin Offshore Wind Farm Limited in accordance with the ExA's Rule 6 letter [PD-001] (Appendix G page 33) that refers to "<i>other wind operators that have made relevant representations</i>". The SoCG is to be submitted in final signed form at D6.</p>
GEN 2.9	Applicant Marine Management Organisation Natural England	<p>Monitoring - Adaptive Management</p> <p>At ISH2 the Applicant stated that it continues to engage with Natural England regarding the need for additional ecological monitoring, including that for marine mammals; however, it was highlighted that Regulation 21(3) of the Infrastructure Planning (Environmental Impact Assessment Regulations) 2017 sets out that measures should be proportionate to the nature, location and size of the proposed development and the significance of its effects on the environment, and that this is the approach that the Applicant has taken [REP4-006].</p> <p>The ExA notes that Regulation 21(3) of the Infrastructure Planning (Environmental Impact Assessment Regulations) 2017 is directed at the Secretary of State when considering whether to impose a monitoring measure if an order is made. The ExA therefore considers that the provisions of Regulation 21(3) have been misrepresented. Notwithstanding, the ExA notes the Applicant's response to ExQ1 GEN 1.8, whereby it states adherence to 2014 guidance issued by the MMO that monitoring should be used where there is uncertainty in the significance of an impact which could lead to a potentially significant impact on a sensitive receptor' and</p>

ExQ2	Question to:	Question:
		<p>'Monitoring should not be required for impacts where there is already high certainty' [REP3-006].</p> <p>The ExA notes that NPS EN-3 states <i>that “should impacts be greater than those predicted, an adaptive management process may need to be implemented and additional mitigation required, to ensure that so far as possible the effects are brought back within the range of those predicted”</i> (paragraph 2.8.222). There is no clear provision in the In-Principle Monitoring Plan (IPMP) for adaptive management should the post-construction monitoring show impacts greater than anticipated.</p> <p>The Applicant should provide amendments to the IPMP to include references to a commitment to adaptive management measures (to be agreed with the MMO and Natural England if required), and if it chooses not to do so, provide an explanation.</p> <p>MMO and Natural England responses on the Applicant’s submission are expected at D6.</p>
GEN 2.10	The Crown Estate	<p>Book of Reference and land rights over the seabed</p> <p>The Crown Estate is asked to :</p> <ul style="list-style-type: none"> i) Review the Applicant’s answer to ExQ1 GEN 1.18 (pages 17-20 [REP3-006]) and confirm if it agrees with the Applicant’s interpretation of ‘land’ further to the judgement of the High Court in the case of R (Parkes) v Secretary of State for the Home Department [2024] EWHC 1253 (Admin), and that a Book of Reference is not required to be submitted. ii) Subject to the grant of the DCO and any terms therein and any other necessary and separate consents, the Crown Estate is asked whether it is confident that it would be able to grant the necessary rights for the undertaking of the Proposed Development.
GEN 2.11	Applicant Natural England	<p>Response to Natural England Risk and Issues Log</p> <p>The Natural England Risk and Issues log [REP4-043] indicates that there are many points that Natural England still has concerns about, coloured red and amber in the log.</p> <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> i) Respond specifically to each of the issues where disagreement remains in Tabs A to G. The ExA is specifically seeking a detailed response to all points that remain red and of the highest concern (i.e. A2/A9, B55, C7), with account of any detailed negotiations to

ExQ2	Question to:	Question:
		<p>resolve those red matters. The ExA requests that the Applicant does not refer the ExA to previous submissions in their answers, rather produces a single document with a response to each amber and red concern.</p> <p>Natural England is asked to:</p> <p>ii) Submit a final Risk and Issues log at D6 addressing all the responses submitted by the Applicant, and if there is no change to the status, explain with sufficient detail why. Please expand on any outstanding concerns, and what outcomes, processes, changes to the DCO and/ or to the outline control documents which are required to be able to address or reduce Natural England’s concerns.</p>
GEN 2.12	Applicant	<p>Greenhouse Gas Assessment</p> <p>Could the Applicant provide comment in light of the recent cases of R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council [2024] UKSC 20 and Friends of the Earth Ltd and South Lakeland Action on Climate Change v SSLUHC [2024] EWHC 2349 (Admin), and whether these cases have any implications for the assessments of greenhouse gas emissions.</p>
AR Aviation and Radar		
AR 2.1	<p>BAE Systems Blackpool Airport Defence Infrastructure Organisation/ Ministry of Defence Isle of Man Government Territorial Seas Committee (Ronaldsway Airport) NATS En-Route plc</p>	<p>Aviation and Radar Mitigation Progress Report</p> <p>The D4 update to the Aviation Mitigation Progress Report [REP4-028] now includes ‘next steps’ and expected timescales for conclusion of agreement as requested by the ExA at ISH2. Could all listed aviation and radar IPs confirm if the Applicant’s summary of progress is correct and provide any necessary updates.</p>
AR 2.2	Applicant	<p>Aviation and Radar Mitigation Requirements</p> <p>The Applicant is to update the draft DCO at D5 to include any new requirements (without prejudice) that may be required to secure mitigation for potential aviation and radar effects for</p>

ExQ2	Question to:	Question:
		<p>each relevant aerodrome in the event that commercial agreement cannot be reached before the close of the Examination.</p> <p>Agreement on such requirements should be recorded in the SoCGs with each of the respective aviation and radar IPs by D6.</p>
AR 2.3	Applicant Blackpool Airport	<p>Blackpool Airport Five Year Review</p> <p>The SoCG with Blackpool Airport (BA.AR.12 [REP1-028]) and the Aviation Mitigation Progress Report [REP3-007] note that a safeguarding assessment is currently being undertaken with an update to the airport’s five year review (with other relevant Irish Sea projects) which is anticipated to be submitted to the Civil Aviation Authority (CAA) in October/November 2024.</p> <ul style="list-style-type: none"> i) Blackpool Airport is asked to submit to the Examination at Deadline 5 a summary of the results of the assessment, a timeline on when it is likely to be approved by the CAA, the likely mitigation, and when this is likely to be agreed between the parties. The Applicant may also wish to respond. ii) If such agreement is expected to be after the conclusion of the Examination (10 March 2025) the Applicant is asked to provide the wording of any Requirement for the draft Development Consent Order.
AR 2.4	Applicant Blackpool Airport Ronaldsway Airport BAE Systems for Walney and Warton Aerodromes Defence Infrastructure Organisation Maritime and Coastguard Agency NATS En-Route plc	<p>Very High Frequency (VHF) Communications</p> <p>The Applicant and BAe notified the ExA at ISH2 that the matter of potential effects to VHF communications was a newly emerging issue since production of the ES, which has arisen from recent CAA advice relating to onshore wind farms.</p> <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> i) Clarify whether an assessment from NATS has now been commissioned (the progress report [REP4-028] states it is ‘commissioning’ an assessment) and advise the likely timescale for its production and submission. ii) Clarify whether potential effects to VHF communications should be considered as part of the EIA process. <p>The Applicant and the listed IPs are asked to:</p> <ul style="list-style-type: none"> iii) Provide a summary of the ongoing discussions on this VHF matter.

ExQ2	Question to:	Question:
		<p>iv) Provide the wording of a preferred (without prejudice) DCO requirement in the event that the matter is not resolved and/or a commercial agreement is not reached before the end of the Examination. This should also be recorded in the final SoCGs.</p> <p>The MCA is asked to:</p> <p>v) Clarify if the VHF matter arising from recent CAA advice is an issue for search and rescue operations and confirm this within the final version of your SoCG.</p>
AR 2.5	Applicant BAE Systems	<p>Aviation and Radar Monitoring</p> <p>The Applicant and BAE Systems stated at ISH2 that monitoring beyond initial testing following completion of the wind turbines is not required, so long as mitigation is demonstrated to be effective (point 51 in [REP4-006]). The parties are asked to include this within the next version of the SoCG.</p> <p>The Applicant is also asked to confirm agreement on whether operational monitoring is required with the other aviation and radar IPs in their respective SoCGs.</p>
AR 2.6	Applicant	<p>Future Baseline - Helicopters</p> <p>Table 11.10 of ES Chapter 11 [APP-015] lists the hydrocarbon infrastructure considered for helicopter access within 9nm of the Morgan array area. Paragraphs 11.5.2.2 and 11.5.2.3 refer to the difficulties in defining the likely evolution of helicopter aviation interests, due to uncertainties relating to future oil and gas licencing rounds and decommissioning of existing fields with resultant declining helicopter use.</p> <p>Could the Applicant clarify if there is any update to the baseline that may affect consideration of effects on helicopter access.</p>
AR 2.7	Applicant Any Interested Parties	<p>Civil Aviation Publication (CAP) 764</p> <p>A consultation revision of CAA CAP 764 was published earlier this year. The Applicant (and any IPs if they wish) are asked to clarify when the final revised document is likely to be published and set out the main changes from the 2016 version quoted in ES Volume 2 Chapter 11 [APP-015] which may affect the consideration of the Application.</p>
AR 2.8	Applicant	<p>Cumulative Radar Early Warning Systems (REWS) impact assessment update</p> <p>The Applicant is asked to clarify if there are any additional updates further to their answer to ExQ1 AR 1.9 [REP3-006].</p>

ExQ2 CF Commercial Fisheries	Question to:	Question:
CF 2.1	Applicant	<p>Outline Fisheries Liaison and Co-existence Plan – clarification of compensation as a last resort for effects to fisheries</p> <p>Having regard to the most up-to-date industry best practice guidelines, the Applicant is asked to submit an updated outline Fisheries Liaison and Co-existence Plan (FLCP) to clarify the mechanism that would be in place for commercial compensation to fisheries stakeholders as a last resort in the worst-case event that the scallop mitigation zone (SMZ) is not fully effective as mitigation and that adverse effects on landings during or post-construction are demonstrated to be significantly greater than the amount assessed as likely in the ES [APP-024] (6.8.1).</p> <p>The ExA acknowledges the Applicant’s commitment to undertake post construction dredge surveys to determine changes to queen scallop from baseline predictions, but these surveys are intended only to validate predictions in the ES. If the species does not recover as predicted in the ES, the ExA wishes to understand how commercial fisheries will be compensated. It is insufficient to respond with a statement that there will be no significant impact to continued access to the queen scallop resource.</p>
CF 2.2	Applicant	<p>Standalone plan to secure Scallop Mitigation</p> <p>The MMO submission at D4 noted that it has concerns about the proposed SMZ “<i>only being indicative at this stage</i>” and considers that the zone should be finalised before a decision is made on the DCO and that a standalone plan secured by the DCO “<i>could be beneficial</i>”.</p> <p>The ExA notes that a minimum area for the SMZ has been added as a commitment in the outline FLCP but requests the Applicant to submit by D5 a standalone plan sufficient to secure a definitive SMZ, with co-ordinates, subject only to minor refinement post-consent, or to give detailed justification why it is not appropriate to do so, cross-referenced to any response to the MMO if applicable.</p>
CF 2.3	National Federation of Fishermen’s Organisations Scottish Fishermen’s Federation West Coast Sea Products	<p>Satisfaction with cable installation and protection commitments submitted at D4</p> <p>The ExA notes the outline Construction Method Statement (CMS) submitted at Deadline 4 includes at Annex A: Outline Cable Specification and Installation Plan (CSIP) including Cable Burial Risk Assessment (CBRA), and at Annex B: Scour Protection and Cable Protection</p>

ExQ2	Question to:	Question:
	Any other Interested Parties	<p>Management [REP4-032]. The Applicant has also revised the wording of TM17 in the outline FLCP [REP4-021].</p> <p>The Fisheries IPs are requested to confirm if they are now sufficiently satisfied with the commitments contained in the outline CSIP/CBRA [REP4-032] and within the Commitments Register [REP4-025], notably commitments Co19 to Co30 inclusive, to be able to agree with the principle of the Scallop Mitigation Zone as proposed.</p>
CF 2.4	Applicant National Federation of Fishermen’s Organisations	<p>Unresolved matters in the SoCG with the NFFO and others</p> <p>The updated SoCG with the NFFO and others contains many unresolved matters, including lack of agreement with the EIA methodology and its conclusions for the project alone and cumulatively. The ExA notes that the record of post-application engagement shows no meeting with the NFFO since September 2024 and that review of the SoCG in December 2024 was only by correspondence.</p> <ul style="list-style-type: none"> i) What assurance can be given to the ExA that best efforts will be made to resolve the ongoing points of discussion in good time for a final SoCG to be submitted at D6? ii) If necessary, would it be helpful to the Examination if the SoCG with the NFFO <i>et al.</i> were to be separated into standalone SoCGs with each of the parties rather than awaiting collective agreement of all the parties?
CF 2.5	Marine Management Organisation National Federation of Fishermen’s Organisations Scottish Fishermen’s Federation West Coast Sea Products Any other Interested Parties	<p>Identification of Irish Sea queen scallop fishing grounds</p> <p>Do you have any observations or critique to make about the analysis produced by ERM and submitted by the Applicant as [REP4-011] identifying “<i>Irish Sea queen scallop fishing grounds generated by digitising information provided in Vause et al, 2007, Defra, 2024 and plotter positions provided by WCSP</i>”?</p>
CE Cumulative Effects		
CE 2.1	Applicant	<p>Cumulative Effects Assessment</p> <p>In the response to ExQ1 CE 1.1 the Applicant offers to prepare a document which consolidates the information within the listed cumulative effects assessment (CEA) tables and sections of</p>

ExQ2: Thursday 19 December 2024

Responses due by Deadline 5: Thursday 16 January 2025

ExQ2	Question to:	Question:
		<p>topic chapters along with any updates to the Review of CEA and In-Combination Assessment notes [REP2-023, REP3-019 and REP4-024] and an updated cumulative effects screening matrix.</p> <p>The Applicant is asked to provide these documents by D6.</p>
CE 2.2	<p>Natural England Natural Resources Wales Meath County Council</p>	<p>Cumulative and In-Combination Assessments review documents</p> <p>A number of CEA/In-combination assessment review documents have been submitted by the Applicant to include updated information relating to other projects in and around the Irish Sea and additional information relating to ornithology [REP2-023, REP3-018, REP3-019, REP4-024, REP4-029].</p> <p>Natural England, NRW and Meath County Council are asked to confirm if they have any comments on the relevant review documents.</p>
CE 2.2	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Moor Vannin Offshore Wind Farm</p> <ul style="list-style-type: none"> i) Provide an update on any progress to submission of your application for Marine Infrastructure Consent, noting any changes to the timeline provided in your answer to CE 1.5 [REP3-041]. ii) Provide details of any further environmental information which has become publicly available since the publication of the preliminary environmental information in August 2024.
CE 2.3	<p>Applicant Natural England Natural Resources Wales</p>	<p>Lifetimes of Existing Offshore Wind Farms</p> <p>The Applicant's response to ExQ CE 1.2 [REP3-006] includes a list of offshore wind farms (OWF) nearing the end of their life, according to the expiry date of their relevant licences.</p> <ul style="list-style-type: none"> i) Natural England and NRW are asked to review the Applicant's answer and provide any additional comments they wish to make regarding the projects nearing the end of their life, and implications for the CEA and in-combination assessment. <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> ii) Provide any relevant corrections further to Ørsted IPs [REP4-048] comments on Barrow and Burbo Bank OWFs.

ExQ2	Question to:	Question:
		<p>iii) Clarify if they are aware if any of the listed OWFs are expected to continue beyond the expiry date of their relevant licences, and whether any consents would be required for such extension of lifetime.</p>
CE 2.4	<p>Applicant Moor Vannin Offshore Wind Farm Limited Isle of Man Government TSC</p>	<p>Moor Vannin Offshore Wind Farm</p> <p>In the event that further environmental information is made publicly available, or the Marine Infrastructure Consent application is submitted to the Isle of Man Government prior to the close of the Examination, the listed parties are asked to:</p> <ul style="list-style-type: none"> i) Comment what approach should be taken by the Applicant to reviewing the CEA (and in-combination assessment) in time for the close of the Examination so that the ExA has an opportunity to consider it and that the Secretary of State is fully informed. ii) Provide commentary on the scenario that the Marine Infrastructure Consent application is determined by the Isle of Man (IoM) Government prior to a decision on the Proposed Development by the Secretary of State for Energy Security and Net Zero.
CE 2.5	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Moor Vannin Offshore Wind Farm transmission infrastructure</p> <p>The D4 update to the Report on Interrelationships with Other Infrastructure Projects [REP4-016] (paragraph 1.2.1.5, Tables 1.1 and 1.2) refers to a separate project for the Moor Vannin transmission infrastructure (the ‘East Irish Sea Transmission Project’) located in English waters, which is in early-stage development and has been the subject of a Section 35 Direction granted on 24 October 2024.</p> <p>Moor Vannin Offshore Wind Farm Limited is asked to submit a copy of the Direction and any other supporting information, including potential timescales for application submission, which would assist the Examination.</p>
CE 2.6	<p>Meath County Council</p>	<p>Irish Offshore Windfarms</p> <p>Meath County Council are invited to review the Applicant’s response [REP1-006] and the reviews of the CEA [REP2-023] and [REP3-019], further to its response to the second transboundary screening [OD-006]. Please provide any comments to the ExA at D5, with any updates to the listed projects or any additional projects relating to Irish waters which may be of relevance.</p>

ExQ2	Question to:	Question:
Parts 1 and 2		
DCO 2.1	Applicant	<p>Part 1 Article 2 Definition of Commence</p> <p>The definition of commence in Article 2 relates to the carrying out of licensed activities rather than any other development. The ExA assumes that this is because the only works authorised by the DCO are works which are licensed activities authorised by the DMLs. If this is the case then the Applicant is asked to include a definition of licensed activities in Part 1, Article 2.</p>
DCO 2.2	Applicant	<p>Part 2 Article 7 Benefit of the Order (1)</p> <p>At [REP4-009], Ref. REP3-037.41] the Applicant repeats its argument of precedent for this article in previous made orders and contends that there is no “<i>exceptional reason to depart from well-established precedent in respect of this matter</i>”. The ExA notes, however, that the Applicant has not addressed the MMOs point that the Applicant has not identified any reasoned justification in any previous decision which explains why the transfer process which it proposes is justified and to be preferred over the existing statutory mechanism [REP2-029], paragraphs 2.2.18 – 2.2.20].</p> <p>The ExA acknowledges the precedent point being made by the Applicant but requests the Applicant to provide specific justification for the inclusion of these provisions in this specific application and why the existing statutory regime set out in s72 of the Marine and Coastal Act 2009 are not suitable.</p>
DCO 2.3	Marine Management Organisation	<p>Part 2 Article 7 Benefit of the Order (2)</p> <p>Without concluding on the matter but contemplating that the SoS may wish to include transfer of the benefit of the DML within the Order, the ExA invites the MMO to provide a revised draft of Article 7 that it may be able to be satisfied with, and also set out any other associated changes to the dDCO that it feels is necessary.</p>
Schedule 2 – Requirements		
DCO 2.4	All Interested Parties	<p>Requirement 1: Time Limits – Commencement and Challenge Period (1)</p> <p>IPs are invited to comment on the Applicant’s responses to ExQ1 DCO 1.4 and DCO 1.5 (pages 50-51 [REP3-006]), in seeking to justify the seven-year commencement period and the extension to the period should a legal challenge be submitted.</p>

ExQ2	Question to:	Question:
DCO 2.5	Applicant	<p>Requirement 1: Time Limits – Commencement and Challenge Period (2)</p> <p>Requirement 1(2) seeks to extend the time limit for commencement if a legal challenge is made. However, it is unclear what is meant by the words <i>'If proceedings are begun ...'</i> The ExA considers that the drafting creates uncertainty because it will not be clear on the face of the Order when the development must commence by. The ExA therefore considers that the words need to be defined, particularly as only the Applicant, the Claimant and the consenting SoS are likely to be aware of any proceedings filed with the court.</p>
Schedules 3 & 4 – draft Deemed Marine Licences		
DCO 2.6	Marine Management Organisation	<p>Enforceability of Conditions 11 and 12</p> <p>Conditions 11 and 12 in DMLs 1 and 2 seek to ensure that the works constructed under each DML cannot, when combined, exceed those consented by the DCO. Condition 11 states that the total number of offshore substation platforms in both licences cannot exceed 4 and Condition 12 states the total length of the interconnector cables in both licences cannot exceed 60km.</p> <p>However, in the event that the total works were to exceed those parameters, would there be a breach of one or both DMLs? Put another way, how will the MMO understand which works will be constructed under which licence and which licence is breached if the works exceed the parameters in Conditions 11 and 12? This is important for enforcement purposes. The view of the MMO on how best to address this quirk of identical parameter controls is invited. Could some wording be added to Condition 20 (Pre-construction plans and documents) for example, to assist the MMO at approval stage? If so please provide suggested wording.</p>
DCO 2.7	Applicant	<p>Micrositing – Condition 20(1)(a)(ii)</p> <p>In ExQ1 DCO 1.19(iv) the Applicant was asked to <i>'iv) Amend the dimensions in Project Description Table 3.7 Layout development principles 5 and 6 as appropriate'</i>. In its response the Applicant stated it will submit an updated version of the Project Description chapter with an update to Table 3.7 at Deadline 6 [REP3-006]. The ExA hereby issues a reminder to the Applicant that this update must be provided at D6.</p>
DCO 2.8	Marine Management Organisation	<p>Outline Decommissioning Plan</p>

ExQ2	Question to:	Question:
		<p>The MMO’s response to ExQ1 DCO 1.13 [REP3-037] refers to a review of a standard DML condition relating to decommissioning. The Applicant was questioned on this at ISH2.</p> <p>The MMO is asked to:</p> <ul style="list-style-type: none"> i) Provide an update on this review. ii) Provide comments on the Applicant’s response to the same question [REP3-006] and further comments arising from discussion at ISH2 (pages 25-26 [REP4-006]) and (REP3-049.79 [REP4-009]) regarding the separate legislative regime being in place, therefore no outline decommissioning plan is considered to be necessary.
DCO 2.9	Applicant	<p>Outline Offshore Construction Method Statement</p> <p>The Applicant is asked to include reference to the outline Offshore Construction Method Statement [REP4-032] in Condition 20(1)(d).</p>
DCO 2.10	Applicant	<p>Pre-Construction Plans - Condition 20(1)(g) (formerly Condition 20(1)(h)): Marine Mammal Mitigation Protocol (MMMP)</p> <p>In ExQ1 DCO 1.27 the Applicant was asked to provide clarity on why submission of a MMMP was necessary under Condition 20(1)(h) and Condition 23(b) of the draft DMLs in Schedules 3 and 4 of the DCO. The ExA notes the Applicant’s response [REP3-006] which stated that <i>‘separate conditions are necessary and that the intention of having a standalone condition 23 is to allow mitigation measures for UXO clearance to be approved, and that activity to be undertaken, before all of the statements, plans and schemes set out in condition 20(1) have been approved.’</i></p> <p>However, the ExA notes that like Condition 23(b), Condition 20(1)(g) (formerly 20(1)(h)) prevents commencement of Unexploded Ordnance (UXO) clearance until a MMMP is submitted to and approved in writing by the MMO. The ExA requires clarification why there is still a need to retain reference to UXO clearance in Condition 20(1)(g), when it is sufficiently covered in Condition 23(b).</p> <p>The Applicant is asked whether Condition 20(1)(g) should just relate to submission of a MMMP for piling activity and remove any reference to UXO clearance activity given that UXO clearance activity and the need for an MMMP in that regard is separately controlled by Condition 23.</p>
DCO 2.11	Applicant	<p>Pre-Construction Plans – Condition 20(1)(a)(v): Micrositing for Reef Habitats</p>

ExQ2	Question to:	Question:
		<p>Natural England has provided a suggested amendment for the wording of draft DML condition 20 (1)(a)(v), in the Risks and Issues Log at Deadline 4 [REP4-043 - rows A7 and G17]. Is the Applicant willing to update the draft DML with the wording suggested by Natural England? If not, why not?</p>
DCO 2.12	<p>Applicant Natural England Marine Management Organisation</p>	<p>Pre-construction Plans - Condition 20(1)(c), Condition 21 and Condition 22</p> <p>Could the Applicant, Natural England and the MMO provide an update on any progress made regarding the timescales included in the DML conditions for approval of pre-construction documentation and agreement of documents, where 4 months can remain and those where 6 months can be accepted.</p>
DCO 2.13	<p>Natural England Marine Management Organisation</p>	<p>Pre-construction Plans – Condition 23(2)</p> <p>Natural England and the MMO are asked to advise if they are content with a three-month approval period for the UXO Clearance method statement and associated MMM. If not, please advise what period of time would be acceptable with reasons.</p>
Schedule 5		
DCO 2.14	<p>Applicant</p>	<p>Schedule 5: Certified Documents</p> <p>The Applicant is asked to check the documents contained within the certified documents set out in Schedule 5 of the draft DCO and ensure the list is fully updated with the final versions by Deadline 6, including:</p> <ul style="list-style-type: none"> • Outline Environmental Management Plan [REP4-018]. • Outline Offshore Construction Method Statement (incorporating Outline Cable Specification and Installation Plan) [REP4-032]. • Greenhouse Gas Reduction Strategy [REP4-023]. • The numerous errata sheets, clarification notes, technical notes and summary tables relating to ornithology and other matters, and/or any updates to the ES and HRA to incorporate such notes. <p>The ExA is also minded to include the Commitments Register [REP4-025] within the list of certified documents. If the Applicant disagrees, provide justification.</p>

ExQ2	Question to:	Question:
HRA 2.1	Applicant Natural England Natural Resources Wales	<p>Summary of Data</p> <p>The Applicant’s numerous responses to Natural England and NRW [REP4-007, REP4-009, REP4-012] refer to recent discussions (13 November and 28 November 2024) and indicate that it is working to provide a summary of data and a solution to resolve all outstanding methodological issues associated with the assessments presented in Volume 2 Chapter 5 Offshore Ornithology [APP-023] and the HRA Stage 2 Information to Support Appropriate Assessment part 3 [APP-098]. The Applicant expects this to provide Natural England with the information necessary to close out many of the outstanding methodological issues without the need for updated assessment document and to reduce the volume of documents submitted into the Examination, with an aim to allow the conclusion of no adverse effect on integrity (AEoI) either alone or in-combination.</p> <p>However Natural England and NRW continue to put to the ExA that the clarification notes essentially serve as additional stress-testing of the Applicant’s conclusions against their advice, in isolation from each other.</p> <ul style="list-style-type: none"> i) The Applicant is asked to share the summary with the statutory nature conservation bodies (SNCB) at the earliest opportunity, and submit a copy at D5, so that complete responses can be submitted by all parties at D5 in order to inform the ExA’s Report on the Implications for European Sites (RIES), to be published on 6 February 2025. ii) Natural England and NRW are asked to comment on the summarised data at D5.
HRA 2.2	Applicant Natural England Natural Resources Wales	<p>Habitats Regulations Assessment derogation case - ornithology</p> <p>The Applicant’s position is that compensation will not be required as there is no AEoI from the Proposed Development either alone or in-combination, and it highlights that the SNCBs consider the risk of AEoI is low.</p> <p>Natural England and NRW’s submissions states that they cannot definitively rule out AEoI until the Applicant has addressed the issues raised in their representations and that they have had the opportunity to review information submitted at D4 (and the summary data as referred to above in HRA 2.1).</p>

ExQ2	Question to:	Question:
		<p>The parties indicate that the remaining issues are capable of being resolved prior to the close of the Examination, and as such a derogation case and compensation may not be required.</p> <p>Natural England, NRW and the Applicant are urged to submit information and comments in as much detail as possible to the Examination by D5 to inform the ExA's RIES, with final confirmation that AEoI can be ruled out and that a derogation case is not required at D6.</p>
HRA 2.3	Applicant Natural England Natural Resources Wales	<p>Liverpool Bay Special Protection Area</p> <p>The Outline Offshore EMP [REP4-018] at 5.6 Annex E and the Commitments Register (Co65) [REP4-025] include reference to measures to minimise disturbance to rafting birds from transiting vessels to be attached to the final Offshore EMP, secured within Condition 20(e) of the DMLs.</p> <ul style="list-style-type: none"> i) Natural England and NRW are asked to confirm whether provision of the documents would allow them to agree that an AEoI of the qualifying features of the Liverpool Bay Special Protection Area (SPA) can be excluded, alone and in-combination. ii) The Applicant is asked to update the Stage 2 SPA Report [APP-098] to record consideration of the Liverpool Bay SPA.
HRA 2.4	Natural England Natural Resources Wales	<p>Kittiwake Apportioning</p> <p>Natural England's Risk and Issues Log [REP4-043] states that it has advised the Applicant on the required updated assessments and will provide further comments in response to any additional material at D5. NRW continues to consider that the correct approach has still not been applied [REP4-044].</p> <p>The Applicant has submitted responses to D3 submissions from Natural England and NRW [REP4-007] and [REP4-009] and an additional clarification note 'Differences between Morgan and Mona in abundance estimates used in the CEA' [REP4-031].</p> <p>The ExA expects further comments from the SNCBs to the additional material at D5 to inform the final SoCG with NRW and Principal Areas of Disagreement Summary Statement (PADSS) from Natural England.</p>
HRA 2.5	Natural England	HRA Stage 1 Assessment

ExQ2	Question to:	Question:
		<p>The Applicant states that <i>'The likelihood of the Morgan Array Area resulting in barrier effects for qualifying features of SPAs are low...'</i> (paragraph 1.4.5.16 [APP-099]). The screening matrices further explain that this is due to the large foraging ranges used by seabirds and the large distances from the Morgan Array Area at which the SPAs are located.</p> <p>The ExA notes that NRW has agreed that barrier effects can be screened out of the assessment with respect to Welsh SPAs [REP3-051].</p> <p>Does Natural England agree with the Applicant's statements that barrier effects can be screened out for all phases?</p>
HRA 2.6	NatureScot Northern Ireland Department of Agriculture, Environment and Rural Affairs	<p>HRA Stage 1 and Stage 2 Assessments</p> <p>The sites for which likely significant effects could not be excluded include those in Wales, Northern Ireland and Scotland. NE's RR [RR-026] highlighted the need for the Applicant to consult the relevant SNCBs on impacts to non-English sites.</p> <p>The SNCBs for Scotland and Northern Ireland, NatureScot and the Department of Agriculture, Environment and Rural Affairs (DAERA) respectively, were invited to participate in the Examination as Other Persons in Appendix B of the ExA's Rule 6 letter [PD-001]. The Applicant's response to NE [RR-026] [PD1-017, p142] confirms that it has consulted with all relevant stakeholders, including NatureScot, and refers to the Consultation Report [APP-088], the Technical Engagement Plan [APP-094] and appendix D Part 4 [APP-092].</p> <p>Can NatureScot and DAERA confirm whether they are in agreement with the outcomes of the Applicant's HRA [APP-096, 097, 098, 099] and [APP-100] for the relevant non-English sites?</p>
HRA 2.7	Natural England	<p>HRA Stage 2 Assessment</p> <p>Natural England are asked to confirm whether it is content that an AEoI, alone and in combination, can be excluded for the following English sites designated for marine mammal qualifying features:</p> <ul style="list-style-type: none"> • Lundy SAC. • Isles of Scilly Complex SAC.
HRA 2.8	Applicant	Isle of Man Ramsar Sites

ExQ2	Question to:	Question:
	Isle of Man Government	<p>Further to the Applicant's response to ExQ1 MO 1.17 the IoM Government TSC confirmed in their response to ISH2 action point 19 that the Applicant has given appropriate consideration to the relevant seabird colonies and listed/proposed Ramsar sites [REP4-039].</p> <p>The Applicant is asked to ensure that the HRA screening report is updated by D6 to include the information provided.</p> <p>The IoM Government TSC and the Applicant are asked to include the matter in the next version of their SoCG.</p>
HRA 2.9	Applicant	<p>Underwater Sound Management Strategy Update (UWSMS)</p> <p>As per the Applicant's response to the Joint Nature Conservation Committee (JNCC) regarding ExQ1 HRA 1.6 [Ref. REP3-035.37 in REP4-007], the ExA hereby issues a reminder to the Applicant to update the outline UWSMS at D5 to reflect that the use of Noise Abatement Strategy technologies is classified as a 'secondary' mitigation measure.</p>
HE Historic Environment		
HE 2.1	Applicant	<p>Historic England Statement of Common Ground</p> <p>The Applicant is asked to submit its response on several points still under discussion in the initial submission of an SoCG with Historic England [REP4-036], notably:</p> <ul style="list-style-type: none"> i) The need for post-consent survey acquisition and data analysis in a sufficiently timely manner to inform design finalisation (HE.TBC.06). ii) The conclusion of no significant adverse residual effects in EIA terms for marine archaeology for the project alone or cumulatively (HE.TBC.08). iii) The need for potential cumulative impacts to the Outstanding Universal Value of the English Lake District World Heritage Site to be assessed (HE.TBC.09). iv) The need for mechanisms to compensate any harm to archaeological assets through "preservation by record" where avoidance through micro-siting of groundworks is not possible (HE.TBC.12). v) Wording of DML conditions needs review to adequately secure implementation in the post-consent, pre-construction phase of detailed archaeological investigation to inform detailed planning and engineering design (HE.TBC.13).

ExQ2	Question to:	Question:
HE 2.2	Historic England	<p>Revised Mitigation and Means of Securing the Commitment</p> <p>Further to your answer to ExQ HE1.3, please confirm satisfaction with the wording of the 'commitment securing mechanism' for Co99 (page 35, [REP4-025]) which currently reads: '<i>...subsequent method statements produced by the Retained Archaeologist and approved by the Statutory Archaeological Curator in advance of works commencing</i>'.</p>
MFS Marine Fish and Shellfish Ecology		
MFS 2.1	Applicant	<p>Electro-magnetic fields</p> <p>NPS EN-3 paragraph 2.8.247 states '<i>it is unknown whether exposure to multiple cables and larger capacity cables may have a cumulative impact on sensitive species. It is therefore important to monitor EMF emissions which may provide the evidence to inform future EIAs</i>'. Could the Applicant explain how it would satisfy this particular paragraph.</p>
MFS 2.2	Applicant Marine Management Organisation	<p>Seasonal Piling Restrictions</p> <p>At ISH2 the Applicant was asked to respond to the MMO's position on the necessity for seasonal piling restrictions during the cod and herring spawning seasons and whether there was a need for a condition in the DMLs to explicitly control piling periods. Despite acknowledging that a seasonal piling restriction was included in the Walney Extension DCO (SI 2014 No. 2950) the Applicant stated it was not necessary to put forward a without prejudice position as it considers the Underwater Sound Management Strategy (UWSMS) the appropriate mechanism to deal with this matter. Following on from ExQ1 MFS 1.2 [PD-004], which asked the MMO whether any changes are necessary to the draft DCO/DMLs to reflect seasonal piling restrictions as a fallback position, the MMO advised that it would provide the Applicant with condition wording and also provide this to the ExA at D4.</p> <p>i) Can the MMO direct the ExA to the part of its submission that contains the draft DML condition wording? If this was not submitted at D4, please submit at D5 with additional commentary on the Applicant's D4 submission [REP4-010] which suggests that any piling restriction in relation to cod should be limited to February to March (and not January to April inclusive) and that the UWSMS is the appropriate mechanism to capture potential mitigation requirements.</p>

ExQ2	Question to:	Question:
		ii) The Applicant is asked to provide a response to the MMO's draft condition at D6, setting out any revisions to the suggested wording (and why), and setting out in detail the effects of the MMO's condition(s) on the construction phase.
MFS 2.3	Marine Management Organisation	<p>Piling Impacts and Scallop Larvae</p> <p>At ISH2 the Applicant was asked to respond to the MMO's suggestion in [REP3-037] that scallop larvae should be considered within the Applicant's UWSMS. The Applicant's submission was that if piling is employed it would never occur continuously over a period of 90 hours and taking account of water movements within the Irish Sea, the scallop larvae would never be within a particular impact range for even a full piling sequence, such that it is not necessary to include mitigation to reduce piling noise effects on scallop larvae within the UWSMS.</p> <p>The MMO is asked to review the Applicant's submissions [EV5-012], [REP4-006] and [REP4-009] and confirm if it is satisfied with the Applicant's rebuttal, or provide a summary of reasons if disagreement remains and further detail on what the MMO would like to see included in the outline UWSMS to address its concerns.</p>
MM Marine Mammals		
MM 2.1	Applicant Marine Management Organisation	<p>Masking in Marine Mammals</p> <p>At ExQ1 MM 1.5 the ExA asked the MMO, NRW and Natural England whether they agreed with the Applicant's statement in Paragraph 4.9.1.2 of ES Volume 2, Chapter 4 [AS-010] that there is insufficient evidence to properly evaluate masking. Whilst NRW and Natural England raised no issue with the Applicant's position, the MMO disagreed [REP4-041] and requested a submission from the Applicant discussing the relevant peer-reviewed literature (for instance, Erbe et al. (2016) and Erbe et al. (2019)).</p> <p>i) The Applicant is asked to submit a response to the MMO's request at D5. ii) The MMO is requested to comment on the Applicant's submission at D6.</p>
MM 2.2	Applicant Natural England	<p>Monitoring the Mitigation for Marine Mammals</p> <p>The ExA notes that there is an outstanding concern from NE in the Risk and Issues Log at Deadline 4 [REP4-043], rows C8 & C32] that proposed post-consent monitoring does not include monitoring the effectiveness of the mitigation measures in reducing the impacts on marine mammals to acceptable levels. The ExA notes the Applicant's position [REP4-009], Ref</p>

ExQ2	Question to:	Question:
		<p>REP3-049.41] that monitoring is not warranted, proportionate to the scale of the effects and was not required for Awel y Mor even though that project had predicted a larger magnitude effect on bottlenose dolphin.</p> <p>Natural England is requested to:</p> <ul style="list-style-type: none"> i) Provide an example of a DCO/DML in which the level of monitoring sought in this case is specified and justify why it should be implemented in this case. If this is a novel case, then NE should set out the terms of the monitoring that it is seeking for marine mammals and explain why. <p>The ExA notes that NE has previously referred the Applicant to Best Practice Advice for monitoring in: <i>'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'</i>. However, the ExA notes that the advice documents are currently stored on a SharePoint Online site, which requires non-Defra staff to request consent for access.</p> <ul style="list-style-type: none"> ii) NE are asked to submit into the examination any documents contained on that SharePoint site which NE seeks to rely upon to sustain its concerns around the lack of marine mammal monitoring and how monitoring should be developed. <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> iii) Confirm that it has reviewed the aforementioned NE Best Practice Advice and to explain how it complies with it, or why it diverges from it. iv) Provide an update on NE's suggestion in [REP3-047] that post-consent monitoring for marine mammals would ideally 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.
MM 2.3	Applicant	<p>UXO Clearance Rates</p> <p>In response to ExQ1 MM 1.9 the Applicant clarified that modelling assumes a maximum of two UXO clearances per day. It added that whilst the identified wording of "at least one UXO per tide" does not contradict the assumption of two high order UXO clearance events per day, the wording has been updated.</p>

ExQ2	Question to:	Question:
		<p>Can the Applicant identify for the ExA where the wording has been updated, as there does not appear to have been any change made to ES Volume 2, Chapter 4 [AS-010], no updated wording in the revised outline Marine Mammal Mitigation Protocol [REP4-019] and no mention in the Errata [REP3-011].</p>
MM 2.4	<p>Applicant Marine Management Organisation Natural England</p>	<p>Underwater Sound Management Strategy – Arbitration</p> <p>The ExA notes that the MMO and Natural England remain concerned about the Applicant’s lack of firm commitment to the use of Noise Abatement Systems (NAS). The ExA also notes the Applicant’s position that the deployment of NAS is not standard industry practice within the UK and at present there is no statutory requirement for NAS to be deployed, although the Applicant’s UWSMS includes NAS as one of a number of mitigation options if required. The ExA also notes the Applicant’s submissions at ISH2 [REP4-006] that through the process of discharging conditions of the DMLs and approving the final plans, the MMO has fundamental control.</p> <p>Can the Applicant, the MMO and NE advise what would happen if agreement on the final UWSMS cannot be reached, and if so how would the matter be arbitrated/ resolved.</p>
MM 2.5	<p>Applicant</p>	<p>Construction Monitoring – Piling</p> <p>As part of the construction monitoring of the first four piled foundations (Condition 28 of the draft DMLs [REP4-013], Table 1.6 of the In Principle Monitoring Plan [REP2-013] and Co57, Co60, Co63 and Co92 of the Commitments Register [REP4-025]) the MMO has requested that at least two of the first four piles of each foundation are the worst-case scenario piles and that this is updated within the aforementioned documents. The MMO also noted that the objective of the noise monitoring is to test the validity of the predictions made in the ES. If the monitoring suggests that the noise levels may exceed those predicted, then the MMO may take remedial action. The MMO requests that an underwater sound monitoring plan or scope of works is to be developed which sets out further details of the proposed monitoring and methodologies.</p> <p>The Applicant is asked to:</p> <ol style="list-style-type: none"> i) Make the requested change to the aforementioned documents or explain why not. ii) Advise how it intends to address the potential requirement for adaptive management if piling noise is found to be greater than the predictions made in the ES.

ExQ2	Question to:	Question:
MM 2.6	Applicant	<p>Behavioural Responses to Underwater Sound</p> <p>ExQ1 MM 1.10(iii) asked why the Applicant had not carried out an assessment of the potential effects of aggregate exposure to underwater sound on the behaviour of marine mammals. In its response [REP3-006] the Applicant stated that the potential effects of 'aggregate exposure' were assessed under section 4.13 (Inter-related Effects) of Volume 2, Chapter 4: Marine Mammals (AS-010) and in Volume 2, Chapter 15: Inter-related effects of the Environmental Statement.</p> <p>Notwithstanding, and as identified by NRW in its Written Representation [REP1-056], the potential effects of aggregate exposures to one or multiple pressures has not been discussed in those documents. The interrelated effects assessment would be made more robust by considering the potential effects of aggregate exposure, particularly within the context of this assessment being used to inform cumulative assessments with other future projects.</p> <p>Can the Applicant revisit its response to ExQ1 MM 1.10 and advise why it has not carried out an assessment of the potential effects of aggregate exposure.</p>
MM 2.7	Marine Management Organisation Natural England Natural Resources Wales	<p>Outline Marine Mammal Mitigation Protocol (MMMP) – draft DML</p> <p>Can the MMO, NE and NRW confirm whether they are content with the Applicant's response to ExQ1 MM 1.3 [REP3-006] – specifically, that it is not necessary for geophysical activities to be referenced in the draft DML Conditions [REP4-013].</p>
MM 2.8	Applicant	<p>Outline MMMP – Scare Charges</p> <p>NE maintains the view that scare charges should be removed from the outline MMMP [REP3-048].</p> <p>The Applicant is asked to consider the removal of scare charges from the outline MMMP [REP4-019], and if not, why not.</p>
MM 2.9	Natural Resources Wales	<p>Injury and Disturbance to Marine Mammals from Vessels – Wylfa Newydd Approach</p> <p>Can NRW confirm whether it is content with the Applicant's response to ExQ1 MM 1.17 [REP3-006] – specifically that the Applicant has used the most appropriate accepted threshold suited to the impact of vessel disturbance, which is more precautionary than the approach used in the Wylfa Newydd study. In addition, can NRW confirm if the Applicant's response</p>

ExQ2: Thursday 19 December 2024

Responses due by Deadline 5: Thursday 16 January 2025

ExQ2	Question to:	Question:
		<p>to them at Deadline 4 [REP4-009, Ref. REP3-050.39] on the same matter alleviates NRW's concerns?</p> <p>If NRW is not content with the Applicant's response, explain why not and what are the implications for the Applicant taking the approach that they have.</p>
MM 2.10	Applicant	<p>Sub Bottom Profiler Surveys</p> <p>In response to the ExQ1 MM 1.23 [REP4-043, row C37] Natural England advises that there is a need for monitoring to fill the knowledge gap on the impact of SBP surveys on harbour porpoises. Natural England advises that monitoring should be considered with the aim to collect data before, during and after SBP surveys to examine changes in the baseline, and that inclusion of this monitoring in the In Principle Monitoring Plan (IPMP) would resolve this issue.</p> <p>The Applicant is asked if it is willing to accept the advice and include the monitoring in the IPMP. If so, please submit a revised IPMP at D5.</p> <p>If not, provide an explanation.</p>
MM 2.11	Natural England	<p>Marine Mammal Sensitivity and Prey Availability</p> <p>In response to EXQ1 MM 1.22 [REP3-048], Natural England advised that it is content with the assigned sensitivity score for Minke whales but due to the vulnerability of harbour porpoise and harbour seal to changes in prey availability their assigned sensitivity score should be upgraded to medium. However, Natural England did not advise the ExA whether their position on this matter makes a material difference to the Applicant's assessment of effects in the ES for harbour porpoise and harbour seal.</p> <p>Can Natural England please clarify?</p>
<p>MP Marine Physical Processes and Benthic Ecology</p>		
MP 2.1	Applicant	<p>Monitoring of Invasive Non-Native Species (INNS)</p> <p>The ExA notes that monitoring to detect the presence of INNS is now included as a commitment in the In Principle Monitoring Plan (IPMP) [REP2-013] and that the Applicant states in its SoCG with the MMO that it will commit to considering the feasibility of collecting samples of the communities colonising the seabed infrastructure for further analysis of INNS. The ExA notes that this is a matter that was agreed at D3 in the SoCG with the MMO, however, neither the IPMP [REP2-013] nor the Commitments Register [REP4-025] capture the commitment to undertake sampling.</p>

ExQ2	Question to:	Question:
		<p>The Applicant is requested to update those documents to include the sampling commitment as an adaptive management measure, as outlined in the Applicant’s D3 submission [REP3-004]. If the Applicant considers it would be inappropriate to do so, then explain why.</p>
MP 2.2	Applicant	<p>Monitoring the Colonisation of Novel Hard Structures</p> <p>Further to ExQ1 MP 1.10, the ExA notes that the updated IPMP [REP2-013] now includes the use of scheduled pre- and post- construction surveys to identify colonisation of novel hard structures to establish an increased evidence base in relation to the possible biodiversity benefits from the introduction of artificial structures. However, the monitoring objective in the IPMP is limited to establishing the colonisation around a representative sample of gravity base foundation structures only.</p> <p>On the basis that several foundation types are under consideration and that colonisation could also occur around pin piled jackets and suction bucket jackets, the ExA requests that the monitoring objective in the IPMP is expanded to include monitoring of all foundation types that are installed.</p> <p>The Commitments Register [REP4-025] would also need to be updated accordingly.</p>
MP 2.3	Applicant	<p>Ballast Material Disposal</p> <p>In response to ExQ1 MP 1.3 the Applicant advised that it will undertake decommissioning of gravity bases by the removal of ballast, including sand sequestered during construction. It added that it is anticipated that the ballast material will be reused or disposed of offsite and not released back into the local system. While the ExA appreciates that decommissioning will be governed by separate legislation and procedure, the ExA and Natural England (See [REP3-048]) remain uncertain about what “<i>reused or disposed of off site</i>” means, as well as what is meant by “<i>the local system</i>”.</p> <p>Does the Applicant mean released back into the water environment beyond the Morgan Array Area, or disposed of on land? The Applicant is asked to provide a more detailed explanation to supplement its response to ExQ1 MP 1.3.</p>
MO Marine Ornithology		
MO 2.1	Applicant Natural England Natural Resources Wales	<p>Summary of Data</p> <p>The Applicant’s numerous responses to NE and NRW [REP4-007, REP4-009, REP4-012] refer to discussions (13 November and 28 November 2024) and indicates that it is working to</p>

ExQ2	Question to:	Question:
		<p>provide a summary of data and a solution to resolve all outstanding methodological issues associated with the assessments presented in Volume 2 Chapter 5 Offshore Ornithology [APP-023]. The Applicant expects this to provide Natural England with the information necessary to close out many of the outstanding methodological issues without the need for updated assessment document and to reduce the volume of documents submitted into the Examination.</p> <p>However Natural England and NRW continue to put to the ExA that the clarification notes essentially serve as additional stress-testing of the Applicant’s conclusions against their advice, in isolation from each other.</p> <p>The Applicant is asked to share the summary with the SNCBs at the earliest opportunity and submit a copy at D5.</p> <p>Natural England and NRW are asked to comment on the summarised data at D5.</p> <p>The parties can combine their response with HRA 2.1.</p>
MO 2.2	Applicant	<p>Updates to Environmental Statement, HRA and related documents</p> <p>Provide a list of any relevant ornithological documents which the Applicant intends to update to incorporate the clarification notes and errata submitted to date and identify those which will be included in the certified documents at Schedule 5 of the draft DCO.</p>
MO 2.3	Natural England Natural Resources Wales Joint Nature Conservation Committee Royal Society for the Protection of Birds	<p>Methodology for Ornithological Assessments</p> <p>The SNCBs and RSPB are asked to confirm at D5 a list of the agreed and not agreed methodological issues, with reference to the summary data as referred to above and the range of clarification notes/errata submitted up to and including D4.</p>
MO 2.4	Applicant	<p>Sabbatical Birds</p> <p>Natural England’s Risk and Issues Log (B28, B29, B46 [REP4-043]) indicates that it is broadly content with the Applicant’s responses on the issue of sabbatical birds, however it advises that the wording in the submitted application documents should be updated with the clarification given by the Applicant in its response (B.69, B.70 [PD1-017]). The Applicant is asked to update the relevant documents accordingly.</p>

ExQ2	Question to:	Question:
MO 2.5	Royal Society for the Protection of Birds	<p>Ornithology clarification notes and CEA/In-Combination Assessment Review</p> <p>The Deadline 1 response [REP1-058] refers to your ongoing review of the technical clarification notes, and that your position will be updated through the SoCG and further written submissions to the Examination. The SoCG [REP1-039] contains limited agreement and notes a number of matters which are an ongoing point of discussion, with one matter (assessment methodology RSPB OO.6) noted as not agreed. The RSPB response to ExQ1 MO 1.8 [REP3-052] does not specifically note whether any additional information or assessment is sought from the Applicant regarding HPAI effects as set out in part v) of the question.</p> <p>The Applicant has submitted a number of additional notes since the SoCG was produced on 3 October.</p> <p>In the absence of an updated version of the SoCG to date, the RSPB is asked to submit a response to the additional clarification notes, CEA Review and the Applicants comments on its response to ExQ1 MO 1.8 [REP4-007 and REP4-008].</p>
MO 2.6	Natural England	<p>Ornithological Monitoring</p> <p>Natural England is asked to review and comment on the Applicant's comments made at [REP4-006] (pages 21-24)] and [REP4-009] (page 35) regarding their reasoning for lack of ornithological monitoring and the suggestion of monitoring of Manx shearwater.</p>
MO 2.7	Natural England Natural Resources Wales Joint Nature Conservation Committee	<p>SSSI and CEA clarification notes</p> <p>NE, NRW and JNCC are asked to review the following additional ornithological clarification notes provided at D4 and provide comment at D5:</p> <ul style="list-style-type: none"> i) Project alone and cumulative assessment for the Great Orme Head SSSI [REP4-029]. ii) Differences between the Morgan Generation Assets and the Mona Offshore Wind Project in abundance estimates used in the CEA [REP4-031].
INF Other Offshore Infrastructure and Activities		
INF 2.1	Applicant Manx Utilities NATS En-Route Ltd	<p>Co-operation or co-existence agreements with other infrastructure operators</p> <p>The Applicant is asked to:</p> <ul style="list-style-type: none"> i) Confirm that there are no other organisations expected to be subject to co-operation or co-existence agreements.

ExQ2	Question to:	Question:
		<p>ii) Provide a final update to the Commercial Side Agreements Tracker at Deadline 6. Manx Utilities and NATS are asked to confirm their positions on the status set out in Table 1.1 of the Applicant's Commercial Side Agreements Tracker [REP3-023].</p>
INF 2.2	Applicant Harbour Energy	<p>Joint Statement with Harbour Energy</p> <p>Further to [AS-011], Harbour Energy and the Applicant are asked to clarify whether this is to remain outside of the Examination or to be secured within the DCO, and if so, what the mutually agreeable mechanism to address mutually exclusive simultaneous operations and marine access would be.</p>
INF 2.3	Applicant	<p>Greenhouse Gas Assessment</p> <p>Provide a technical note to include an assessment on the potential net effect on Greenhouse Gas emissions, taking account of the Wake Impact Assessment Report [REP4-049] and the calculated reduction in energy yield of the six OWFs operated by the Ørsted IPs.</p>
INF 2.4	Applicant	<p>Potential wake effects 1</p> <p>Provide a response to:</p> <ul style="list-style-type: none"> i) Paragraph 3.11 of the Ørsted IPs comments on [REP4-048] in which they ask the Applicant to confirm whether it has undertaken an assessment of energy yield and wake effects of the Proposed Development (either together with or separately from the Mona project) and if so, whether specialist consultants were engaged in that exercise. ii) The Wake Impact Assessment Report [REP4-049].
INF 2.5	Barrow Offshore Wind Limited Burbo Extension Limited Walney Extension Limited Morecambe Wind Limited Walney (UK) Offshore Windfarms Limited Ørsted Burbo (UK) Limited (collectively "the Ørsted IPs")	<p>Potential wake effects 2</p> <p>Tables 5-4 and 5-5 of the Wake Impact Assessment Report [REP4-049] provide a summary of the results of the wake loss assessment for each of the main scenarios on each of the Ørsted IPs windfarms, expressed as a percentage wake loss. Could the Ørsted IPs update the tables to include the following additional information:</p> <ul style="list-style-type: none"> i) Identify the percentage losses in terms of a quantified total energy loss (in kWh) for each scenario and OWF affected each year. ii) Taking into account the above, what the overall quantified total energy loss would be for each OWF having regard to the current operational life of each.

ExQ2	Question to:	Question:
INF 2.6	Applicant The Ørsted IPs	<p>Potential wake effects 3</p> <p>Provide a commentary on how you consider the matter of any loss of renewable energy yield from other OWFs might be a matter to be demonstrated in the mitigation hierarchy and in consideration of Critical National Priority, and how it might be weighed in the planning balance.</p>
INF 2.7	The Ørsted IPs	<p>Potential wake effects 4</p> <p>Provide a final statement to the Examination regarding potential wake loss effects at D6. To include:</p> <ul style="list-style-type: none"> i) A response to the technical note on Greenhouse Gas emissions to be submitted by the Applicant at D5. ii) A summary of the policy and legislation being used to justify your comments (there is no need to repeat previous submissions, only summarise the relevant points). iii) Comments on the relevance of the recommendation report and Secretary of State decision relating to the Awel y Mor Offshore Wind Farm to this Examination. iv) A summary of the outcome which the Ørsted IPs expect to achieve from the Secretary of State's consideration of effects on wake loss, and measures that the Applicant could explore to mitigate the predicted effects on AEP as set out in the Wake Impact Assessment Report [REP4-049], indicating whether such mitigation could be secured within the DCO or by commercial agreement (this response can be combined with that to INF 2.8).
INF 2.8	Applicant The Ørsted IPs	<p>Wake Loss – potential mitigation</p> <p>The Ørsted IPs response to ISH2 Action Point 13 [REP4-047] includes potential mitigation measures to reduce loss of AEP including design and operational changes such as installing a smaller number of large turbines, reducing capacity, increasing separation distance, wind sector management and wake steering. They consider that a commercial side agreement would assist in ensuring their interests are adequately protected, but that this would require meaningful engagement from the Applicant.</p> <p>The Applicant's response (HAP_ISH2_13 [REP4-004]) refers to the final design process and the Crown Estate's 7.5km separation distance, and maintains that an assessment is not required and that the matters are not suitable for either protective provisions nor a commercial side agreement.</p>

ExQ2	Question to:	Question:
		<ul style="list-style-type: none"> i) The Ørsted IPs are asked to explain what is meant by ‘wind sector management’ and ‘wake steering’. ii) The Applicant is asked to comment on the potential mitigation measures referred to by the Ørsted IPs. iii) Both the Ørsted IPs and the Applicant are asked to comment on the following as a potential means of resolving the issue of wake loss: NPS EN-3 Paragraph 2.8.262 states that <i>“In some circumstances, the Secretary of State may wish to consider the potential to use requirements involving arbitration as a means of resolving how adverse impacts on other commercial activities will be addressed.”</i>
INF 2.9	Mooir Vannin Offshore Wind Farm Limited Ørsted IPs	<p>Mooir Vannin Offshore Wind Farm Application</p> <p>The Applicant’s response to the Ørsted IPs D3 submission on wake effects [REP4-009, point REP3-070.24] notes that:</p> <p><i>“The Mooir Vannin Scoping Report does not contain reference to wake effects ... it appears that Ørsted do not consider it necessary for their own projects to make an assessment of such matters (as has been the case for the other six Ørsted projects that have been brought forward under the Planning Act to date). Further, the Applicant cannot see any response to the Scoping Report from the Ørsted IPs to Mooir Vannin in the Scoping Opinion. The Applicant is surprised by this given the Ørsted IPs claimed importance of an assessment being undertaken for all of the Round 4 developments (both within the Irish Sea and North Sea). The Mooir Vannin project is of a similar size, location and distance from the Ørsted IPs assets compared to the Morgan Generation Assets and is therefore assumed to have an equivalent wake effects potential on the Ørsted IPs assets”.</i></p> <p>Mooir Vannin Offshore Wind Farm Limited are asked:</p> <ul style="list-style-type: none"> i) Has a wake loss assessment been carried out regarding effects on AEP of the Ørsted IPs existing OWFs within the Irish Sea, and if so, will it inform the forthcoming submission for Marine Infrastructure Consent, including consideration of any mitigation? ii) Is there any reference in Isle of Man policy or legislation or seabed leasing conditions for such an assessment? <p>The Ørsted IPs are asked to provide comment on the Applicant’s response [REP4-009] in respect of potential wake effects of Mooir Vannin Offshore Wind Farm, and its comments in</p>

ExQ2	Question to:	Question:
		relation to ISH2 action point 11 [REP4-004] regarding the specific exclusion of Mooir Vannin Offshore Wind Farm from the Wake Impact Assessment Report [REP4-049].
INF 2.10	The Crown Estate	<p>Offshore Wind Leasing Round 4</p> <p>The Ørsted IPs D4 submissions include the Crown Estate's response to Outer Dowsing Offshore Wind (Generating Station) ExQ1 OG 1.2 [REP4-051], in supporting their comments relating to the minimum 7.5km distance referred to in the Offshore Wind Leasing Round 4 [REP4-046, REP4-047, REP4-048 and REP4-049].</p> <p>The Crown Estate are invited to make any additional comments relating to this matter which are specific to the Morgan Generation Assets project and the existing and proposed OWFs within and around the Irish Sea which would assist in the ExA's consideration of wake effects.</p>
SN Shipping and Navigation		
SN 2.1	Isle of Man Territorial Sea Committee Maritime and Coastguard Agency UK Chamber of Shipping	<p>Guidance on navigational route width in IoM territorial waters</p> <p>The IoM Harbours Division (through the IoM Government TSC), the MCA and the UK Chamber of Shipping are invited to advise on any or all of the following:</p> <ul style="list-style-type: none"> i) Whether the World Association for Waterborne Transport Infrastructure (PIANC) WG161 recommendations on shipping route width as described in the Applicant's Cumulative Regional Navigational Risk Assessment [APP-060] (Appendix E, Section 7.6) is applicable to navigation within Manx territorial waters between the Proposed Development and the proposed Mooir Vannin OWF array. If not, why not? ii) Are the PIANC WG161 recommendations endorsed by the International Maritime Organisation? iii) Whether there are any contradictions between these PIANC WG161 recommendations and MGN654. iv) Whether there been any further related guidance on marine spatial planning for the interaction between maritime navigation and offshore windfarms produced since that 2018 PIANC WG161 report.
SN 2.2	Applicant	PIANC WG161 recommendations report

ExQ2	Question to:	Question:
		<p>i) The Applicant is asked to submit to the Examination Library a copy of the World Association for Waterborne Transport Infrastructure (PIANC) WG161 recommendations report, subject to express permission from the publisher.</p> <p>ii) Signpost in the NRA [APP-060] or provide a supplementary note on any provisions of the United Nations Convention on the Law of the Sea and the International Maritime Organisation General Provisions on Ships' Routeing that are relevant to determining safety of navigation in constrained space between or adjacent to windfarms.</p>
SN 2.3	<p>Isle of Man Territorial Sea Committee Moir Vannin Offshore Wind Farm Limited Stena Line UK Chamber of Shipping</p>	<p>Design vessel length in relation to PIANC guidance for safe passage space</p> <p>The IPs listed are asked to comment on what would be a reasonable 'design vessel' length overall (LOA) to be applied in relation to the PIANC guidance on route width as discussed in [APP-060, Appendix E, Section 7.6] considering the vessels expected to transit the sea space between the Proposed Development and the proposed Moir Vannin OWF, either on passage to or from the Port of Douglas or on passage past the east and north of the Isle of Man.</p>
SN 2.4	<p>Maritime and Coastguard Agency Moir Vannin Offshore Wind Farm Limited Stena Line UK Chamber of Shipping</p>	<p>Precedent for restricted navigation corridors past OWFs</p> <p>The ExA invites comment from the listed IPs on the discussion of UK precedent for restricted channels between windfarms presented in [APP-060, Section 7.6 of Appendix E] as expanded in the Applicant's Annex 3.1 to responses to ISH2 Action Points [REP4-005] and invites suggestion of any other relevant precedent (whether or not flanked on both sides by offshore wind turbine arrays) of navigation route 'corridors' of restricted width, outwith ports and harbours.</p>
SN 2.5	<p>Moor Vannin Offshore Wind Farm Limited</p>	<p>Outstanding responses to Action Points from Issue Specific Hearing 2</p> <p>Moor Vannin Offshore Wind Farm Limited is asked to coordinate the following with its responses to Action Points from ISH2 issued for its attention [EV5-014, APs 7 to 10 inclusive]:</p> <p>i) A summary note describing the conclusions of its NRA to date exclusively with regard to navigational risk in the sea space adjacent to the Moor Vannin and Morgan projects and the Walney Extension OWF, including a summary statement on any bridge simulations carried out or the scope and intention of any further bridge simulations planned to study use of that sea space. Note: the ExA does not wish to receive into the Examination the entirety of the Moor Vannin NRA.</p>

ExQ2	Question to:	Question:
		ii) A plan illustrating the proposed structures boundary or order limits following your December NRA workshop and having regard to your answer to ExQ SN1.9 [REP3-041] , if different to that shown in [REP3-039] Indicative WTG Layout February 2024.
SN 2.6	Applicant Mooir Vannin Offshore Wind Farm Limited	<p>Safe route width between Proposed Development and Mooir Vannin OWF</p> <p>The ExA invites both the Applicant and Mooir Vannin Offshore Wind Farm Limited to provide draft wording for a requirement in the draft DCO or a condition in the draft DMLs ensuring that a sufficient separation distance between the Proposed Development structures and the proposed Mooir Vannin structures must be achieved in final design layout by the <u>second</u> of the two proposals to receive development consent (if both projects are granted consent) in order to ensure an acceptable residual level of navigational safety risk in that sea space can be achieved that is acceptable to both the IoM Government Harbours Division and the MCA as well as shipping stakeholders.</p> <p>Please also provide an opinion whether this would be more appropriate as a requirement to be discharged by the Secretary of State or a condition to be discharged by the MMO.</p>
SN 2.7	Maritime and Coastguard Agency Stena Line UK Chamber of Shipping Any Other Interested Parties	<p>Security for continuation of the Marine Navigation Engagement Forum</p> <p>The listed IPs are asked to confirm if they consider that adequate security for post-consent stakeholder engagement would be provided by Commitment Co72 in the Commitments Register [REP4-025] which commits to continued engagement of the Marine Navigation Engagement Forum (MNEF) post-consent, and if not, why not.</p>
SN 2.8	Applicant Maritime and Coastguard Agency	<p>Emergency response for disabled or drifting vessels in sea space between wind farms</p> <p>The UK Chamber of Shipping [REP3-025], UKCoS.SN.23b] continue to contend that emergency towage capability or resource may be required to mitigate risks from cumulative projects related to drifting (disabled) vessels in the corridors between proposed wind farms. The Applicant and the MCA are asked whether that capability would be made available as part of development post-consent of the Emergency Response and Cooperation Plan (ERCoP) secured by compliance with MGN654 under Condition 25 in the draft DMLs.</p> <p>If so, how might it be controlled by a Marine Coordination Centre as referenced in the Applicant's answer to ExQ1 SN 1.20 [REP3-006].</p>

ExQ2	Question to:	Question:
SN 2.9	Isle of Man Steam Packet Company Stena Line UK Chamber of Shipping	<p>Agreeing assessment of likely effects of ferry route deviations</p> <p>The listed IPs are asked to report briefly by D6 the best efforts they have made to agree with the Applicant an assessment of any likely significant social or economic effects and carbon emissions effects of the route deviation that would be necessitated by the presence of the proposed Morgan Generation Assets array alone, for each ferry route or routes which would be affected. It would be helpful to the ExA if such assessment were to be stated <u>on a percentage change basis</u>.</p>
SN 2.10	Isle of Man Steam Packet Company	<p>Assessment of effects of deviation of ferry routes</p> <p>The IoMSPC is invited to respond by D5 to the Applicant's responses [REP4-007, pages 43 to 50] to the IoMSPC's D3 answers to ExQ1, including the Applicant's contention that the analysis of environmental effects on ferry services presented by the IoMSPC is precautionary because some parameters seem to have been overstated, including fuel cost and amount of sailings that would be adverse weather routed, needing further justification. The ExA notes from this submission that the Applicant "<i>is engaging with the IoMSPC to resolve residual commercial effects in parallel to the Examination</i>".</p>
SN 2.11	Isle of Man Steam Packet Company Stena Line	<p>Mitigation for adverse commercial and carbon emissions effects of ferry deviations</p> <p>The IoMSPC and Stena Line are each asked to advise:</p> <ol style="list-style-type: none"> i) What mitigation it is seeking for adverse commercial and carbon emissions effects resulting from the need for deviated passages of its ferry services. ii) How would any such mitigation be allocated among the cumulative projects creating the need for deviation. iii) How should any such mitigation be secured via a DCO, if made.
SLV Seascape, Landscape and Visual		
SLV 2.1	The Applicant Natural England	<p>Protected Landscapes</p> <p>Guidance on the Protected Landscapes Duty was published on 16 December 2024, setting out how the duty is intended to operate and providing broad principles to guide compliance with Section 245 of the Levelling up and Regeneration Act 2023.</p>

ExQ2: Thursday 19 December 2024

Responses due by Deadline 5: Thursday 16 January 2025

ExQ2	Question to:	Question:
		The Applicant and Natural England are asked to provide comment on the relevance of the guidance to the Proposed Development, in particular that which relates to the setting of Protected Landscapes.