



Morven South Offshore Wind Array Project

Environmental Impact Assessment Report

Volume 3, Annex 6.3: EIA Commitments Register

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Prepared by:	Prepared for:
TTRPSEL	Morven Offshore Wind Limited

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1 Introduction

1.1 Overview

- 1.1.1.1 This Annex of the Morven South Offshore Wind Array Project (hereafter “Morven South”) Environmental Impact Assessment (EIA) Report provides a summary of the designed-in measures, mitigation, and monitoring commitments for Morven South. For each commitment, the justification for the measures, the means of implementation and the related topic chapter/assessment to which the measure applies, is also identified.
- 1.1.1.2 The summaries presented below are drawn from the related topic chapters within Volume 2 of the Morven South EIA Report:
- Volume 2, Chapter 7: Physical Processes;
 - Volume 2, Chapter 8: Benthic Subtidal Ecology;
 - Volume 2, Chapter 9: Fish and Shellfish Ecology;
 - Volume 2, Chapter 10: Marine Mammals;
 - Volume 2, Chapter 11: Offshore Ornithology;
 - Volume 2, Chapter 12: Commercial Fisheries;
 - Volume 2, Chapter 13: Shipping and Navigation;
 - Volume 2, Chapter 14: Marine Archaeology;
 - Volume 2, Chapter 15: Aviation (Military and Civil);
 - Volume 2, Chapter 16: Other Sea Users and Communications;
 - Volume 2, Chapter 17: Socio-Economics
 - Volume 2, Chapter 18: Climate Change;
 - Volume 2, Chapter 19: Major Accidents and Disasters;
 - Volume 2, Chapter 20: Human Health.
- 1.1.1.3 There are no mitigation, monitoring or designed-in measures relating specifically to Volume 2, Chapter 21: Inter-Related and Ecosystem Effects.

2 Summary of the Designed-in measures

2.1.1.1 A summary of the designed-in measures, mitigation and monitoring commitments is provided in Table 2.1.

Table 2.1: Overview of the Designed-in measures, mitigation and monitoring for Morven South

Commitment reference	Commitment	Justification	Type	Project phase				Relevant topic														Means of securing the commitment	Relevant application documents				
				Pre-construction	Construction	Operations and maintenance	Decommissioning	Overarching	Physical processes	Benthic subtidal ecology	Fish and shellfish ecology	Marine mammals	Offshore ornithology	Commercial fisheries	Shipping and navigation	Aviation	Marine archaeology	Other sea users	Socio-Economics	Climate change	Major accidents and disasters			Human health			
MM-1	Development of and adherence to a Scour Protection Management Plan (SPMP).	There is the potential for scouring of seabed sediments to occur due to interactions between metocean regime (wave and currents) and foundations or other seabed structures. This scouring can develop into depressions around the structure. The use of scour protection around offshore structures and foundations will be employed, as described in Volume 1, Chapter 3: Project Description. The SPMP will set out the approach to scour protection installation and monitoring. This will maximise protection of offshore infrastructure as far as possible during the project lifecycle.	Primary (Designed-in Measure)			x			x	x																Secured via the Section 36 and Marine Licence via the requirement for a Scour Protection Management Plan.	Volume 2, Chapter 7: Physical processes, Volume 2, Chapter 8: Benthic Subtidal Ecology, Volume 2, Chapter 12: Commercial Fisheries and Volume 2, Chapter 18: Climate change Management Volume 4, Annex 1, Appendix 1.3 : Scour Protection Management Plan (SPMP) (Version 1)
MM-2	Development of and adherence to a Cable Plan which will include a cable burial risk assessment (CBRA) and cable burial and protection monitoring throughout the operational phase.	A Cable Plan will set out the approach to protection of cables during the project lifecycle. It will reduce the risks of vessel underwater allision with cable protection, anchor or fishing gear interaction with subsea cables and interference with magnetic position fixing equipment. The Cable Plan will implement management and monitoring of cable protection (via burial or external protection where adequate burial depth, as identified via risk assessment, is not feasible) with any damage, destruction or decay of cables notified to Maritime and Coastguard Agency, Northern Lighthouse Board (NLB), Kingfisher and United Kingdom (UK) Hydrographic Office no later than 24 hours after discovered. This will reduce the probability of cables becoming unburied and impacting other sea users and marine ecology receptors. Cable burial and protection monitoring will be undertaken throughout the operational phase to assess the status of cable burial and any deployed protection. A Cable Burial Risk Assessment (CBRA) will be undertaken to inform the Cable Plan. This will include a target burial depth of 1m	Primary (Designed-in Measure)		x	x		x	x	x	x															Development of and adherence to a Cable Plan, including a Cable Burial Risk Assessment is expected to be secured as a condition of the Section 36 and Marine Licence.	Volume 1, Chapter 3: Project Description, Volume 2, Chapter 7: Physical Processes, Volume 2, Chapter 8: Benthic Subtidal Ecology, Volume 2, Chapter 9: Fish and Shellfish Ecology, Volume 2, Chapter 12: Commercial Fisheries, and Volume 2, Chapter 13: Shipping and Navigation

Commitment reference	Commitment	Justification	Type	Project phase				Relevant topic														Means of securing the commitment	Relevant application documents					
				Pre-construction	Construction	Operations and maintenance	Decommissioning	Overarching	Physical processes	Benthic subtidal ecology	Fish and shellfish ecology	Marine mammals	Offshore ornithology	Commercial fisheries	Shipping and navigation	Aviation	Marine archaeology	Other sea users	Socio-Economics	Climate change	Major accidents and disasters			Human health				
		(subject to CBRA findings), and the requirement for a minimum burial depth of 0.5m. At locations where the minimum burial depth is not achievable, cable protection may be necessary to avoid cables becoming exposed during the lifetime of Morven South. The CBRA will consider relevant activities in the vicinity of inter-array and interconnector cables and confirm appropriate means of protection taking account of the final inter-array and interconnector cable. The CBRA will identify the appropriate target burial depth to ensure the cable remain buried, or appropriately protected, where target burial depths cannot be achieved, for the duration of Morven South, to minimise the risk of interaction with other sea users or cable exposure.																										
MM-3	Development of and adherence to an Operation and Maintenance Plan (OMP) that will include the requirement for any cable rock protection re-installed during the operations phase to follow industry standard guidelines for slope angle and rock grading.	The OMP will provide details of routine inspections which may be required post-construction including inter-array and interconnector cables to ensure target burial depth is maintained. Routine inspections of cable and scour protection will be detailed, to monitor impact to physical processes and determine if remedial works are required. If secondary scour is identified, remedial works may be undertaken to both mitigate environmental impacts and to provide asset security.	Primary (Designed-in Measure)			x																					Development of and adherence to an Operation and Maintenance Plan is expected to be secured as a condition of the Section 36 and Marine Licence from Marine Directorate – Operations and Licencing Team.	Volume 2, Chapter 7: Physical Processes, and Volume 2, Chapter 12: Commercial Fisheries
MM-4	Development of and adherence to a Construction Method Statement (CMS), which will require the use of durable materials within the offshore substation platform structures, in line with appropriate design standards for offshore wind in the North Sea.	The CMS will ensure that all works are carried out efficiently, safely, and in compliance with environmental and regulatory requirements. The CMS will outline the planned approach, procedures, and safety measures for the offshore construction activities. Ensures resilience to future climate change, in particular from the risk of increased wear from sea level rise,	Tertiary (Designed-in Measure)		x																						Development of and adherence to an Construction Method Statement is expected to be secured as a condition of the Section 36 and Marine Licence	Volume 2, Chapter 7: Physical Processes, Volume 2, Chapter 12: Commercial Fisheries, and Volume 2, Chapter 18: Climate Change

Commitment reference	Commitment	Justification	Type	Project phase				Relevant topic														Means of securing the commitment	Relevant application documents					
				Pre-construction	Construction	Operations and maintenance	Decommissioning	Overarching	Physical processes	Benthic subtidal ecology	Fish and shellfish ecology	Marine mammals	Offshore ornithology	Commercial fisheries	Shipping and navigation	Aviation	Marine archaeology	Other sea users	Socio-Economics	Climate change	Major accidents and disasters			Human health				
		<p>South related vessel activity by the Marine Coordinator via a Permit to Work system.</p> <ul style="list-style-type: none"> during the construction phase, Morven South construction areas will be clearly marked using buoys any dropped objects dropped on the seabed during works associated with Morven South will be reported and objects will be recovered where they pose a hazard to fishing or safe navigation, and where recovery is practicable. FMMCP sets out procedure in relation to gear fastening, loss, damage for gear relocated/removed by gear owner. Monitoring: commitment to engaging with the East Region Commercial Fisheries Working Group (or equivalent) and other relevant parties to contribute to the development of a strategic, regionally coordinated approach to commercial fisheries monitoring. Communication: throughout all phases of Morven South, the Applicant will remain committed to maintaining open dialogue and effective communication with the fishing industry. 																										
MM-19	To appoint a Company Fisheries Liaison Officer (CFLO).	The CFLO will support ongoing liaison and ensure clear communication between the Applicant and commercial fishers. They will provide a point of contact to liaise and engage with the fishing industry and to facilitate productive relationships with commercial fishers.	Tertiary (Designed-in Measure)	x	x	x	x																				Secured as a condition of the Marine Licence and Section 36 via the requirement for a Fisheries Mitigation, Monitoring and Communication Plan.	Volume 2, Chapter 12: Commercial Fisheries and Volume 4, Annex 3: Fisheries Mitigation, Monitoring and Communication Plan (Version 1)

Commitment reference	Commitment	Justification	Type	Project phase				Relevant topic														Means of securing the commitment	Relevant application documents					
				Pre-construction	Construction	Operations and maintenance	Decommissioning	Overarching	Physical processes	Benthic subtidal ecology	Fish and shellfish ecology	Marine mammals	Offshore ornithology	Commercial fisheries	Shipping and navigation	Aviation	Marine archaeology	Other sea users	Socio-Economics	Climate change	Major accidents and disasters			Human health				
		<ul style="list-style-type: none"> Adopting the LMP and therefore reducing lighting to be compliant with MM-34, will provide the minimum amount and intensity of lighting that Morven South can legally have whilst remaining compliant with mandatory Health and Safety lighting requirements. 																										
MM-35	Regular inspections to be carried out to assess wind turbine and offshore substation platform conditions.	Ensures resilience to future climate change, in particular from the risk of increased wear from sea level rise, extreme weather events and increased precipitation.	Primary (Designed-in Measure)			x																					Development of and adherence to a Operation and Maintenance Plan is expected to be secured as a condition of the marine licence from Marine Directorate - Licencing and Operations Team. Required via MGN 654.	Volume 2, Chapter 18: Climate Change
MM-36	Prior to the start of construction, the Ministry of Defence Aeronautical Information Documents Unit (AIDU) and UK Hydrographic Office will be provided with the information required for inclusion on aviation charts.	Prior to the start of construction, the MOD Aeronautical Information Documents Unit and UK Hydrographic Office will be provided with the information required for inclusion on aviation charts. Appropriate information about the site construction and any associated lighting (where applicable), for example the height and temporary location of construction cranes, would then be provided to the NATS Aeronautical Information Service (AIS) (for promulgation in applicable aviation publications, including the UK Integrated Aeronautical Information Package (IAIP)). This is in line with standard industry practice to allow inclusion on aviation charts.	Tertiary (Designed-in Measure)		x																						Expected to be secured as a condition of the marine licence from Marine Directorate - Licencing and Operations Team via the requirement for a Navigation Safety Plan and Vessel Management Plan and Lighting and Marking Plan.	Volume 2, Chapter 15: Aviation (Military and Civil)

Commitment reference	Commitment	Justification	Type	Project phase				Relevant topic														Means of securing the commitment	Relevant application documents			
				Pre-construction	Construction	Operations and maintenance	Decommissioning	Overarching	Physical processes	Benthic subtidal ecology	Fish and shellfish ecology	Marine mammals	Offshore ornithology	Commercial fisheries	Shipping and navigation	Aviation	Marine archaeology	Other sea users	Socio-Economics	Climate change	Major accidents and disasters			Human health		
MM-40	Development of and adherence to a piling strategy which will include a soft-start procedure (including low hammer initiation and ramp up) to be implemented for pile driving.	To reduce the likelihood of injury from elevated underwater noise to marine receptors in the immediate vicinity of piling operations as much as possible, allowing individuals to move away from the area before sound levels reach a level at which injury may occur.	Primary (Designed-in Measure)		x							x	x												Expected to be secured as a condition of the Marine Licence and Section 36 consent via a requirement for a Piling Strategy and associated Marine Mammal Mitigation Plan.	Volume 2, Chapter 9: Fish and Shellfish Ecology and Volume 2, Chapter 10: Marine Mammals
MM-41	A minimum of 1,000m spacing between wind turbines.	Sufficient spacing between wind turbines will mitigate potential wake effects between wind turbines for Morven South, and ensure safe passage of vessels and SAR helicopters operating under instrument meteorological conditions (IMC) flight rules, in line with MCA guidance.	Primary (Designed-in Measure)			x			x																Expected to be secured as a condition of the Marine Licence and Section 36 consent and is part of the design of the project.	Volume 2, Chapter 7: Physical Processes
MM-42	The Applicant will monitor supply chain expenditure against the SCDS, as required by the Crown Estate Scotland (CES) Option Lease Agreement.	To ensure the commitments outlined in the SCDS - to support economic growth within Scotland and the UK - are being met	Primary (Designed-in Measure)	x	x	x	x												x						This is committed to within the Supply Chain Development Statement, which has been secured through the Option Lease Agreement.	Volume 2, Chapter 17: Socio-Economics
MM-43	A minimum blade tip clearance of 34 m above Lowest Astronomical Tide.	To reduce impact to seabirds as most seabirds fly close to the sea surface. Increasing the clearance between blade tip and sea surface reduces potential for collision. This minimum blade tip height clearance is considered appropriately conservative so as to reduce the risk of bird collisions in the specific circumstances of Morven South.	Primary (Designed-in Measure)			x							x										x		Designed-in measure and expected to be secured as a condition of the Marine Licence and Section 36.	Volume 2, Chapter 13: Shipping and Navigation and Volume 2, Chapter 11: Offshore Ornithology
MM-44	Design standards for structural safety will be in line with international requirements, with allowance for increased heights	Ensure resilience to future climate change, in particular from the risk of increased wear from extreme weather events, sea level rise and wave heights.	Primary (Designed-in Measure)		x	x																	x	x	Industry best practice.	Volume 2, Chapter 18: Climate Change

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