

East Anglia ONE Offshore Wind Farm

Table of proposed amendments to the Deemed Marine Licences (updated 12 November 2014)

**Table 1.**  
Administrative Amendments.  
**Please note we consider these all to be minor or non-material changes with no EIA or DCO consequences.**

Condition	Current wording	Requested amendment	Consultation required	Supporting Comments EAOL
<b>Schedule 10, Deemed licence under the Marine and Coastal Access Act 2009 – generation assets</b>				
Part 2(Conditions); Condition 7 (Offshore safety management)	(1) <i>The authorised scheme shall not commence until the Secretary of State, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and adequately addressed all MCA recommendations contained within MGN 371 “Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues” and its annexes including full details of the Emergency Co-operation Plans (ERCoP) for the construction, operation and decommissioning as appropriate to the authorised scheme.</i>	MMO to consider the following amendment:  (1) <i>The authorised scheme shall not commence until the <del>Secretary of State</del> <u>MMO</u>, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and adequately addressed all MCA recommendations contained within MGN 371 “Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues” and its annexes including full details of the Emergency Co-operation Plans (ERCoP) for the construction, operation and decommissioning as appropriate to the authorised scheme.</i>	DECC	It is queried whether this condition should refer to the MMO rather than the Secretary of State.
Condition 11(b) (Pre-construction plans and documentation)	(b) <i>a construction and monitoring programme to include details of—</i>  <i>(i) the proposed construction start date;</i>  <i>(ii) proposed timings for mobilisation of plant, delivery of materials and installation works;</i>  <i>(iii) proposed pre-construction surveys, baseline report format and content, construction monitoring, post-construction monitoring and related reporting in accordance with sub-paragraph (h) and conditions 17, 18 and 19; and</i>  <i>(iv) an indicative written construction programme for all wind turbine generators, offshore substations, meteorological masts and cables comprised in the works at paragraph 2(2) of Part 1 (licensed marine activities) (insofar as not shown in paragraph (ii));</i>  <i>with details pursuant to paragraph (iii) to be submitted to the MMO at least six months prior to the <u>first survey</u> unless otherwise agreed in writing with the MMO;</i>	MMO to consider the following amendment:  (b) <i>a construction <u>programme</u> and monitoring <del>programme</del> <u>plan</u> to include details of—</i>  <i>(i) the proposed construction start date;</i>  <i>(ii) proposed timings for mobilisation of plant, delivery of materials and installation works;</i>  <i>(iii) proposed pre-construction surveys, baseline report format and content, construction monitoring, post-construction monitoring and related reporting in accordance with sub-paragraph (h) and conditions 17, 18 and 19; and</i>  <i>(iv) an indicative written construction programme for all wind turbine generators, offshore substations, meteorological masts and cables comprised in the works at paragraph 2(2) of Part 1 (licensed marine activities) (insofar as not shown in paragraph (ii));</i>  <i>with details pursuant to paragraph (iii) to be submitted to the MMO <u>as part of the monitoring plan in accordance with the following—</u></i>  <i>(aa) at least four months prior to the first survey, <u>detail of the pre-construction surveys and an outline of all proposed monitoring;</u></i>  <i>(bb) at least four months prior to construction, <u>detail on construction monitoring;</u></i>  <i>(cc) at least four months prior to commissioning, <u>detail of post-construction (and operational) monitoring;</u></i>	none	EAOL proposes to submit the following two documents to discharge this Condition:  1. Construction Programme  2. Monitoring Plan – this will cover pre-construction, construction, post-construction environmental surveys; and will include the survey and reporting programme (notably the operational monitoring will be covered in the outline operational monitoring and maintenance plan ( <b>OOMMP</b> )).  The Monitoring Plan will be a live document with an <u>outline</u> of all proposed monitoring and a reporting programme.  The detail on pre-construction surveys will be submitted as part of this plan no less than four months prior to the first survey.  This shall subsequently be reviewed and resubmitted as follows:  • Four months prior to construction, to include detail on the construction monitoring.  • Four months prior to commissioning, to include detail on the post-construction (and operational) monitoring.
				EAOL requests that the deadline for submission of information be amended from six months to four months prior to survey, construction or commissioning activity.  EAOL requests that consideration is given to the timing of submission of the construction and post-construction monitoring (rather than all to be provided four months before the pre-construction surveys).

Condition	Current wording	Requested amendment	Consultation required	Supporting Comments EAOL
		<i>unless otherwise agreed in writing with the MMO;</i>		
Condition 11(d) (Pre-construction plans and documentation)	<i>(d) a project environmental management and monitoring plan to include details of— ...</i>	MMO to consider the following amendment: <i>(d) a project environmental management and monitoring plan to include details of— ...</i>	none	EAOL requests that the reference to "monitoring" in the title of the required document is removed, as this element will be covered in the amended Condition 11(b) (see above for the proposed amendments).
Condition 11(g) (Pre-construction plans and documentation)	<i>(g) a cable specification and installation plan, to include— (iii) appropriate methods such as trawl or drift net to be deployed along the offshore subsea cables within the authorised scheme as agreed in writing by the MMO, following the survey referred to in condition 19(2)(d) to assess any seabed obstructions resulting from burial of cables as part of the authorised scheme;</i>	MMO to consider deletion of Condition 11(g)(iii).	DECC	With regard to Condition 11(g)(iii), EAOL considers that this is not relevant for the generation assets, as it has not given a commitment for full over trawlability within the wind farm area. Therefore it should be deleted.
Conditions 17 (Pre-construction monitoring and surveys), 18 (Construction monitoring), 19 (Post construction)	<i>...in consultation with Natural England and JNCC...</i>	MMO to consider replacing "JNCC" with "relevant statutory nature conservation body".	none	EAOL requests that "JNCC" is replaced with "relevant statutory nature conservation body"
Condition 17(1) (Pre-construction monitoring and surveys)	<i>(1) The undertaker must, in discharging condition 11(b), submit details for written approval by the MMO in consultation with Natural England and JNCC of proposed pre-construction surveys, including methodologies and timings, and a proposed format and content for a pre-construction baseline report; and— ...</i>	MMO to consider the following amendment: <i>(1) The undertaker must, in discharging condition 11(b)(iii), submit <del>details</del> the monitoring plan for approval by the MMO in consultation with Natural England and <del>JNCC</del> the relevant statutory nature conservation body containing details of proposed pre-construction surveys, including methodologies and timings, and a proposed format and content for a pre-construction baseline report; and— ...</i>	none	As noted above, the proposed pre-construction surveys will be specified in the Monitoring Plan.
Condition 17(2)(e) (Pre-construction monitoring and surveys)	<i>(d) appropriate surveys of existing ornithological activity inside the area(s) within the Order limits in which it is proposed to carry out construction works, and any wider area(s) where appropriate, which is required to test predictions in the environmental statement concerning key ornithological interests of relevance to the authorised scheme;</i>	MMO to agree approach with regard to the Monitoring Plan.	none	As noted above, the proposed pre-construction surveys will be specified in the Monitoring Plan.
Condition 18 (Construction monitoring)	<i>(1) The undertaker must, in discharging condition 11(b), submit details for approval by the MMO in consultation with Natural England and JNCC of any proposed monitoring, including methodologies and timings, to be carried out during the construction of the authorised scheme. In any event, such monitoring must include measurements of noise generated by the installation of the first four jacket foundations of each discrete jacket foundation type to be installed.</i>	MMO to consider the following amendment: <i>(2) The undertaker must, in discharging condition 11(b)(iii), submit <del>details</del> the monitoring plan for approval by the MMO in consultation with Natural England and <del>JNCC</del> the relevant statutory nature conservation body containing details of any proposed monitoring, including methodologies and timings, to be carried out during the construction of the authorised scheme. The survey proposals must specify each survey's objectives. In any event, such monitoring must include measurements of noise generated by the installation of the first four jacket foundations of each discrete jacket foundation type to be installed.</i>	none	As noted above, the proposed pre-construction surveys will be specified in the Monitoring Plan.
Condition 19(1) (Post construction)	<i>(1) The undertaker must, in discharging condition 11(b), submit details of approval by the MMO in consultation with Natural</i>	MMO to consider the following amendment: <i>(1) The undertaker must, in discharging condition 11(b)(iii),</i>	none	As noted above, the proposed post-construction surveys will be specified in the Monitoring Plan.

Condition	Current wording	Requested amendment	Consultation required	Supporting Comments EAOL
	<i>England and JNCC of proposed post-construction surveys, including methodologies and timings, and a proposed format, content and timings for providing reports on the results. The survey proposals must specify each survey's objectives and explain how it will assist in either informing a useful and valid comparison with the pre-construction position and/or will enable the validation or otherwise of key predictions in the environmental statement.</i>	<i>submit <del>details</del> <u>the monitoring plan</u> for approval by the MMO in consultation with Natural England and <del>JNCC</del> <u>the relevant statutory nature conservation body containing details</u> of proposed post-construction surveys, including methodologies and timings, and a proposed format, content and timings for providing reports on the results. The survey proposals must specify each survey's objectives and explain how it will assist in either informing a useful and valid comparison with the pre-construction position and/or will enable the validation or otherwise of key predictions in the environmental statement.</i>		
Condition 19(2) (Post construction)	<i>(c) appropriate ornithological surveys covering the area(s) within the Order limits in which construction works were carried out, and any wider area(s) where appropriate, as required to test predictions in the environmental statement concerning key ornithological interests of relevance to the authorised scheme;</i>	MMO to agree approach with regard to the Monitoring Plan.	none	Surveys will be specified in the Monitoring Plan.
<b>Schedule 11 (Deemed licence under the Marine and Coastal Access Act 2009 – transmission assets)</b>				
Condition 10 (Pre-construction plans and documentation)	<i>(b) a construction and monitoring programme to include details of—  (i) the proposed construction start date;  (ii) proposed timings for mobilisation of plant, delivery of materials and installation works;  (iii) proposed pre-construction surveys, baseline report format and content, construction monitoring, post-construction monitoring and related reporting in accordance with sub-paragraph (h) and conditions 17, 18 and 19; and  (iv) an indicative written construction programme for all offshore substations and cables comprised in the works at paragraph 2(2) of Part 1 (licensed marine activities) of this Schedule (insofar as not shown in paragraph (ii));  with details pursuant to paragraph (iii) to be submitted to the MMO at least six months prior to the <u>first survey</u> unless otherwise agreed in writing with the MMO;</i>	MMO to consider the following amendments:  <i>(b) a construction <u>programme</u> and monitoring <u>programme plan</u> to include details of—  (i) the proposed construction start date;  (ii) proposed timings for mobilisation of plant, delivery of materials and installation works;  (iii) proposed pre-construction surveys, baseline report format and content, construction monitoring, post-construction monitoring and related reporting in accordance with sub-paragraph (h) and conditions 17, 18 and 19; and  (iv) an indicative written construction programme for all offshore substations and cables comprised in the works at paragraph 2(2) of Part 1 (licensed marine activities) of this Schedule (insofar as not shown in paragraph (ii));  with details pursuant to paragraph (iii) to be submitted to the MMO <u>as part of the monitoring plan in accordance with the following—</u>  <u>(aa) at least four months prior to the first survey, detail of the pre-construction surveys and an outline of all proposed monitoring;</u>  <u>(bb) at least four months prior to construction, detail on construction monitoring;</u>  <u>(cc) at least four months prior to commissioning, detail of post-construction (and operational) monitoring;</u>  unless otherwise agreed in writing with the MMO;</i>	none	EAOL proposes to submit the following two documents to discharge this Condition:  1. Construction Programme  2. Monitoring Plan – this will cover pre-construction, construction, post-construction environmental surveys; and will include the survey and reporting programme (notably the operational monitoring will be covered in the outline operational monitoring and maintenance plan ( <b>OOMMP</b> )).  The Monitoring Plan will be a live document with an <u>outline</u> of all proposed monitoring and a reporting programme.  The detail on pre-construction surveys will be submitted as part of this plan no less than four months prior to the first survey.  This shall subsequently be reviewed and resubmitted as follows:  • Four months prior to construction, to include detail on the construction monitoring.  • Four months prior to commissioning, to include detail on the post-construction (and operational) monitoring.  EAOL requests that the deadline for submission of information be amended from six months to four months prior to survey, construction or commissioning activity.  EAOL requests that consideration is given to the timing of submission of the construction and post-construction monitoring (rather than all to be provided four months before the pre-construction surveys).
Condition 10(d) (Pre-construction plans and documentation)	<i>(d) a project environmental management and monitoring plan to include details of—</i>	MMO to consider the following amendment:  <i>(d) a project environmental management <del>and monitoring</del> plan</i>	none	EAOL requests that the reference to "monitoring" in the title of the required document is removed, as this element will be covered in the amended Condition 10(b) (see above for the proposed amendments).

Condition	Current wording	Requested amendment	Consultation required	Supporting Comments EAOL
	...	to include details of— ...		
Condition 10(g) (Pre-construction plans and documentation)	(g) a cable specification and installation plan, to include—  (iii) appropriate methods such as a trawl or drift net to be deployed along the offshore subsea export cables between Work No. 1 in Schedule 9 (deemed licence under the Marine and Coastal Access Act 2009 – generation assets) and mean low water mark, following the survey referred to in condition 19(2)(d) to assess any seabed obstructions resulting from burial of the export cables;	MMO to consider deletion of Condition 10(g)(iii)	none	With regard to Condition 10(g)(iii), EAOL queries whether this provision can be deleted as it would be covered (incorporated) by the Monitoring Plan in Condition 10(b).
Conditions 16 (Pre-construction monitoring and surveys), 17 (Construction monitoring), 18 (Post construction)	...in consultation with Natural England and JNCC...	MMO to consider replacing "JNCC" with "relevant statutory nature conservation body".	none	EAOL requests that "JNCC" is replaced with "relevant statutory nature conservation body"
Condition 16(1) (Pre-construction monitoring and surveys)	(1) The undertaker must, in discharging condition 11(b), submit details for written approval by the MMO in consultation with Natural England and the relevant statutory nature conservation body of proposed pre-construction surveys, including methodologies and timings, and a proposed format and content for a pre-construction baseline report; and—  ...	MMO to consider the following amendment:  (1) The undertaker must, in discharging condition 10(b)(iii), submit <del>details</del> <u>the monitoring plan</u> for approval by the MMO in consultation with Natural England and <del>JNCC</del> <u>the relevant statutory nature conservation body containing details</u> of proposed pre-construction surveys, including methodologies and timings, and a proposed format and content for a pre-construction baseline report; and—  ...	none	As noted above, the proposed pre-construction surveys will be specified in the Monitoring Plan.
Condition 17 (Construction monitoring)	(1) The undertaker must, in discharging condition 10(b), submit details for approval by the MMO in consultation with Natural England and the relevant statutory nature conservation body of any proposed monitoring, including methodologies and timings, to be carried out during the construction of the authorised scheme.	MMO to consider the following amendment:  (2) The undertaker must, in discharging condition 10(b)(iii), submit <del>details</del> <u>the monitoring plan</u> for approval by the MMO in consultation with Natural England and <del>JNCC</del> <u>the relevant statutory nature conservation body containing details</u> of any proposed monitoring, including methodologies and timings, to be carried out during the construction of the authorised scheme..	none	As noted above, the proposed pre-construction surveys will be specified in the Monitoring Plan.
Condition 18(1) (Post construction)	(1) The undertaker must, in discharging condition 11(b), submit details of approval by the MMO in consultation with Natural England and JNCC of proposed post-construction surveys, including methodologies and timings, and a proposed format, content and timings for providing reports on the results. The survey proposals must specify each survey's objectives and explain how it will assist in either informing a useful and valid comparison with the pre-construction position and/or will enable the validation or otherwise of key predictions in the environmental statement.	MMO to consider the following amendment:  (1) The undertaker must, in discharging condition 10(b)(iii), submit <del>details</del> <u>the monitoring plan</u> for approval by the MMO in consultation with Natural England and <del>JNCC</del> <u>the relevant statutory nature conservation body containing details</u> of proposed post-construction surveys, including methodologies and timings, and a proposed format, content and timings for providing reports on the results. The survey proposals must specify each survey's objectives and explain how it will assist in either informing a useful and valid comparison with the pre-construction position and/or will enable the validation or otherwise of key predictions in the environmental statement.	none	As noted above, the proposed post-construction surveys will be specified in the Monitoring Plan.

**Table 2**  
**These amendments are likely to require some consultation**

Schedule 10 (Deemed licence under the Marine and Coastal Access Act 2009 – generation assets)				
Condition 11(k) (Pre-construction plans and documentation)	<i>(k) a coexistence statement demonstrating how the scheme design and construction methods, including cable specification, installation and armouring, reasonably avoids or mitigates effects on other marine users, including fisheries.</i>	MMO to consider deletion of Condition 11(k).	DECC	EAOL notes that Condition 11(k) repeats the provisions of Condition 11(d) (v). EAOL requests that this is therefore deleted.
Condition 17(2)(e) (Pre-construction monitoring and surveys)	<i>(e) low intensity information gathering of elasmobranch populations within the Order limits in which it is proposed to carry out construction and any wider areas where appropriate, to test predictions made in the environmental statement concerning impacts to elasmobranchs from electromagnetic fields;</i>	MMO to consider deletion of Condition 17(2)(e).	CEFAS	This survey is not relevant for the generation assets. Furthermore, existing evidence suggests that there is limited value in these surveys in their power to detect change.
Condition 17(2)(f) (Pre-construction monitoring and surveys)	<i>(f) appropriate surveys of existing marine mammal activity inside the area(s) within the Order limits in which it is proposed to carry out construction works and any wider area(s) where appropriate which is required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme.</i>	MMO to consider deletion of Condition 17(2)(f). Note that EAOL will also discuss further with Natural England.	NE	Existing evidence suggests that there is limited value in these surveys in their power to detect change at a population level for these mobile species.  EAONE has committed funding and resources to the DEPONS project which is a potentially more valuable strategic project in relation to collecting evidence on the impact of OWF's on harbour porpoise populations.
Condition 18(4) (Construction monitoring)	<i>(4) Construction monitoring must include traffic monitoring in accordance with the outline navigation monitoring strategy, including the provision of reports on the results of that monitoring periodically as requested by the MCA.</i>	MMO to consider deletion of Condition 18(4).	MCA	EAOL considers that this monitoring is not necessary during construction and therefore requests that it is deleted.
Condition 19(2) (Post construction)	<i>(a) appropriate surveys of any benthic communities/benthos constituting Annex 1 Habitat in whole or in part inside the area(s) within the Order limits in which construction works were carried out;</i>	MMO to consider EAOL's proposals.	CEFAS / NE	As noted above the surveys will be specified in the Monitoring Plan.  EAOL's outline proposal is for one post-construction survey with subsequent requirements for monitoring to be agreed. Notably the OOMMP provides a mitigation strategy for avoiding future unexpected impact on Annex 1 during maintenance activities.
Condition 19(2) (Post construction)	<i>(b) if existing data is not available, appropriate surveys to validate predictions made in the environmental statement in relation to habitat creation and the ability of structures to act as vectors for non-native species;</i>	MMO to consider the following amendment:  <i>(b) where gravity base foundations are proposed and if existing data is not available, appropriate surveys to validate predictions made in the environmental statement in relation to habitat creation and the ability of structures to act as vectors for non-native species;</i>	CEFAS / NE	This condition was proposed specifically in relation to the option for gravity bases which are no longer within the project plan.
Condition 19(2) (Post construction)	<i>(d) one high resolution swath bathymetric survey across the area(s) within the Order limits in which construction works were carried out to assess any changes in bedform topography and such further monitoring as may be agreed to ensure scour equilibrium has been reached and that the cables have been buried;</i>	MMO to consider EAOL proposals.	CEFAS	Surveys will be specified in the Monitoring Plan.  EAOL's outline proposal is for one post-construction survey with subsequent requirements for monitoring to be agreed.
Condition 19(2) (Post construction)	<i>(e) side scan sonar and bathymetry survey(s) within the Order limits in which construction works were carried out after the first occurrence of a major storm event;</i>	MMO to consider deletion of Condition 19(2)(e).	CEFAS	Existing evidence suggests that this may be of limited value given the location and distance from shore/water depth. There may be engineering reasons to undertake an asset condition review but this should be outweighed by the regulatory requirements. There is a practical

				and logistical difficulty in mobilising surveys on all OWFs post a storm event.
Condition 19(2) (Post construction)	<i>(f) appropriate marine mammal surveys covering the area(s) within the Order limits in which construction works were carried out and any wider area(s) where appropriate, as required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme;</i>	MMO to consider deletion of Condition 19(2)(f).  Note that EAOL will also discuss further with Natural England.	NE	Existing evidence suggests that there is limited value in these surveys in their power to detect change at a population level for these mobile species.  EAOL has committed funding and resources to the DEPONS project which is a potentially more valuable strategic project in relation to collecting evidence on the impact of OWF's on harbour porpoise populations.
Condition 19(2) (Post construction)	<i>(g) low intensity information gathering (in conjunction with reports of fisheries catch data) within the Order limits in which construction works were carried out, to test predictions made in the environmental statement concerning impacts to elasmobranchs from electromagnetic fields;</i>	MMO to consider deletion of Condition 19(2)(g).	CEFAS	This survey is not relevant for the generation assets. Furthermore, existing evidence suggests that there is limited value in these surveys in their power to detect change.
Schedule 11 (Deemed licence under the Marine and Coastal Access Act 2009 – transmission assets)				
Condition 10(l) (Pre-construction plans and documentation)	<i>(l) a coexistence statement demonstrating how the scheme design and construction methods, including cable specification, installation and armouring, reasonably avoids or mitigates effects on other marine users, including fisheries.</i>	MMO to consider deletion of Condition 10(l).	DECC	EAOL notes that Condition 10(l) repeats the provisions of Condition 10(d)(v). EAOL requests that this is therefore deleted.
Condition 16(2)(d) (Pre-construction monitoring and surveys)	<i>(d) appropriate surveys of existing ornithological activity inside the area(s) within the Order limits in which it is proposed to carry out construction works, and any wider area(s) where appropriate, which is required to test predictions in the environmental</i>	MMO to consider deletion of Condition 16(2)(d).	NE	EAOL notes that there are no ornithological concerns from installation of transmission works. Therefore it is requested that this is deleted, as surveys will be covered in the generation assets DML.
Condition 16(2)(e) (Pre-construction monitoring and surveys)	<i>(e) low intensity information gathering of elasmobranch populations within the Order limits in which it is proposed to carry out construction and any wider areas where appropriate, to test predictions made in the environmental statement concerning impacts to elasmobranchs from electromagnetic fields;</i>	MMO to consider deletion of Condition 16(2)(e).	CEFAS	Existing evidence suggests that there is limited value in these surveys in their power to detect change.
Condition 16(2)(f) (Pre-construction monitoring and surveys)	<i>(f) appropriate surveys of existing marine mammal activity inside the area(s) within the Order limits in which it is proposed to carry out construction works and any wider area(s) where appropriate which is required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme.</i>	MMO to consider deletion of Condition 16(2)(f).	NE	This survey is not relevant to transmission assets. In any event, existing evidence suggests that there is limited value in these surveys in their power to detect change at a population level for these mobile species.  EAOL refers to the provision of a Marine Mammal Mitigation Protocol for the installation stage which is required to be submitted under Condition 10(f).
Condition 17 (Construction monitoring)	<i>(2) Construction monitoring must include traffic monitoring in accordance with the outline navigation monitoring strategy, including the provision of reports on the results of that monitoring periodically as requested by the MCA.</i>	MMO to consider deletion of Condition 17(2).	MCA	This survey is not relevant to transmission assets. In any event, EAOL considers that this monitoring is not necessary during construction.
Condition 18(2)(a) (Post construction)	<i>(a) appropriate surveys of any benthic communities/benthos constituting Annex 1 Habitat in whole or in part inside the area(s) within the Order limits in which construction works were carried out;</i>	MMO to consider EAOL proposals.	CEFAS / NE	As noted above the surveys will be specified in the Monitoring Plan.  EAOL's outline proposal is for one post-construction survey with subsequent requirements for monitoring to be agreed. Notably the OOMMP provides a mitigation strategy for avoiding future unexpected impact on Annex 1 during maintenance activities.
Condition 18(2)(b) (Post construction)	<i>(b) if existing data is not available, appropriate surveys to validate predictions made in the environmental statement in relation to habitat creation and the</i>	MMO to consider deletion of Condition 18(2)(b).	CEFAS / NE	Impact monitoring is not relevant for the transmission assets. In any event, this Condition was proposed specifically in relation to the

construction)	<i>ability of structures to act as vectors for non-native species;</i>			option for gravity bases which are no longer within the project plan.
Condition 18(2)(c) (Post construction)	<i>(c) appropriate ornithological surveys covering the area(s) within the Order limits in which construction works were carried out, and any wider area(s) where appropriate, as required to test predictions in the environmental statement concerning key ornithological interests of relevance to the authorised scheme;</i>	MMO to consider deletion of Condition 18(2)(c).	NE	Impact monitoring is not relevant for the transmission assets.
Condition 18(2)(d) (Post construction)	<i>(d) one high resolution swath bathymetric survey across the area(s) within the Order limits in which construction works were carried out to assess any changes in bedform topography and such further monitoring as may be agreed to ensure scour equilibrium has been reached and that the cables have been buried;</i>	MMO to consider EAOL's proposals	CEFAS	Surveys will be specified in the Monitoring Plan. EAOL's outline proposal is for one post-construction survey with subsequent requirements for monitoring to be agreed.
Condition 18(2)(e) (Post construction)	<i>(e) side scan sonar and bathymetry survey(s) within the Order limits in which construction works were carried out after the first occurrence of a major storm event;</i>	MMO to consider deletion of Condition 18(2)(e).	CEFAS	Existing evidence suggests that this may be of limited value given the location and distance from shore/water depth. There may be engineering reasons to undertake an asset condition review but this should be outwith the regulatory requirements. There is a practical and logistical difficulty in mobilising surveys on all OWFs post a storm event.
Condition 18(2)(f) (Post construction)	<i>(f) appropriate marine mammal surveys covering the area(s) within the Order limits in which construction works were carried out and any wider area(s) where appropriate, as required to test predictions in the environmental statement concerning key marine mammal interests of relevance to the authorised scheme;</i>	MMO to consider deletion of Condition 18(2)(f).	NE	Impact monitoring is not relevant for the transmission assets.
Condition 18(2)(g) (Post construction)	<i>(g) low intensity information gathering (in conjunction with reports of fisheries catch data) within the Order limits in which construction works were carried out, to test predictions made in the environmental statement concerning impacts to elasmobranchs from electromagnetic fields;</i>	MMO to consider deletion of Condition 18(2)(g).	CEFAS	Existing evidence suggests that there is limited value in these surveys in their power to detect change.
Condition 18(2)(h) (Post construction)	<i>(h) post-construction traffic monitoring in accordance with the outline navigation monitoring strategy, including the provision of reports on the results of that monitoring periodically as requested by the MCA.</i>	MMO to consider deletion of Condition 18(2)(h).	MCA	This survey is not relevant for the transmission assets.