

Strictly Private and Confidential

For the attention of: Fern Skeldon
Marine Development
Lancaster House
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NE4 7YH

Your reference: DCO/2013/0001
Date: 13 May 2020
Our reference: 003558336-01
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13 May 2020

The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015 – Request to Vary Schedule 9 and 11 Deemed Marine Licences (Deemed Marine Licences 2 and 4)

Dear Ms Skeldon,

As the Case Manager for the Sofia Offshore Wind Farm you are aware that The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015 (“**the Order**”) was granted by the Secretary of State on 4 August 2015. Subsequent variations of the Deemed Marine Licences (“**DMLs**”) contained in Schedules 8, 9, 10 and 11 of the Order were made on 22 March 2017, and of Schedules 9 and 11 of the Order made on 25 April 2019. The Order was also amended in March 2019 by The Dogger Bank Teesside A and B Offshore Wind Farm (Amendment) Order 2019 (“**the Amendment Order**”).

Sofia Offshore Wind Farm Limited (“**SOWFL**”) is a wholly owned subsidiary of Innogy (one of the four energy companies comprising the Forewind Limited consortium that applied for, and was granted, development consent under the Order). Since the Order was granted the consortium has split. SSE and Equinor now own 50% each of Dogger Bank C (“**DBC**”, formerly the Teesside A Wind Farm) under a new consortium, Doggerbank Offshore Wind Farm Project 3 Projco Limited (“**DBWF**”). SOWFL, now owns 100% of the Sofia Offshore Wind Farm (“**SOWF**”, formerly the Teesside B Wind Farm).

Since the Amendment Order was granted SOWFL has continued working on the detailed project design and, as a result, has determined that further amendments are required to the Order including the DMLs. The amendments to the Order are being progressed through a number of separate applications to the Secretary of State. A joint application is being made by SOWF and DBC for changes to the structure and processes set out in the Order to allow the projects to be constructed and operated separately, and separate applications are being made by each of the Project companies for specific matters related to their project. This letter relates to the changes being sought by SOWFL to its project only. The key variations sought to Schedules 9 and 11 of the Order for SOWF only are:

- An increase in the maximum hammer energy used for monopole installation for both wind turbine generators and the offshore converter platform, from 3,000kJ to 4,000kJ.
- Consent to lay cables between the wind turbine generators and the offshore converter platform

- Increase the number of fibre-optic cables laid with the HVDC cables from one to two, within Work Nos. 1B, 2B and 3B
- The transfer of relevant Conditions from Schedule 9 to Schedule 11 associated with Works 1B for the offshore converter platform to reflect that the asset will be transferred to an Offshore Transmission Owner (“OFTO”) post-construction, and
- Full details of cable specifications and installation to be incorporated within the Pre Construction Plans and Documentation Condition for a Cable Specification and Installation Plan to avoid duplication within the Condition for a Construction Method Statement.
- The potential for a temporary communication system to be installed on the wind turbine generator transition piece. Amended wording for the definition of a ‘wind turbine generator’ to include for communication systems.
- Ancillary works referred to in DCO but previously not included within the DMLs. Additional ancillary works requested to cover preparatory works and scour protection for foundations (which have been assessed in the Environmental Statement) similar to works already present for cables.
- Confirmation in writing from the MMO to only be required to demonstrate that SOWFL has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA recommendations as appropriate to the authorised project contained within MGN543.
- Corrections to ensure consistency within the Condition wording of Schedules 9 and 11.

Appendices One and Two provide detail on the purpose of each proposed change for Schedules 9 and 11 respectively. SOWFL has informally consulted with the MMO on some of the proposed changes through monthly project teleconferences and through the submission of dML clarifications (Document reference 003089436-01 submitted on 02 May 2019). MMO provided a response via email on 24 June 2019 including letter referenced DCO/2013/0001.

For the avoidance of doubt, the changes sought to Schedules 9 and 11 will affect the SOWF offshore works only. Further detail is provided below on the applications currently submitted or due for submission at the same time as this application which request changes to SOWF either through the DCO or DMLs.

- SOWFL is making a further application (aligned with the DML variations requested and detailed above) for offshore changes which are required in the DCO. A Regulation 7 letter was submitted to BEIS on 18 March 2020 and the full application is anticipated to be made in April 2020. This application will be submitted to BEIS to amend the Order using the non-material change process (“**NMC Application**”). The Marine Management Organisation (“**MMO**”) will be consulted on this NMC application.
- SOWFL and DBC are making a joint application to make non-material changes to the drafting of the Order to reflect SOWFL and Teesside A (Dogger Bank C) projects being taken forward by separate project companies. The changes are principally to the requirements of the Order to facilitate delivery of the projects and clarify project responsibilities. . A Regulation 7 letter was submitted to BEIS on 18 March 2020 and the full application is anticipated to be made in April 2020.

SOWFL is aware that DBWF has also submitted a NMC application and DML Variation which relate solely to DBC and make no changes to SOWF.

Enclosed with this application are DMLs for SOWF together with tracked changed documents showing the requested changes to the DMLs at Schedules 9 and 11 of the Order. SOWFL considers that the changes are non-material as no new or updated environmental statement is required, the changes themselves do not require a further Habitats Regulations Assessment or any new or additional licenses in respect of European Protected Species. In addition, no new compulsory purchase powers are required and as the changes are restricted to the offshore environment, SOWFL does not consider that they will have any discernible impact on local people or businesses over and above what has already been assessed. As a result, SOWFL does not consider that the application requires advertisement pursuant to the Marine Works (Environmental Impact Assessment) Regulations 2007 (as amended).

I understand that a fee will be payable to the MMO in relation to the amendments and confirm that SOWFL will make the requisite fee payment once an invoice has been issued by the MMO, that references the correct purchase order number.

If you have any queries, please do not hesitate to contact me.

Yours sincerely



Harriet Thomas
Consent Manager
Sofia Offshore Wind Farm Limited
Innogy Renewables UK Limited

Encs:

DML Schedule 9 Clean and track change versions of proposed variations (Ecodoc Ref: 003016493-01)
DML Schedule 11 Clean and track change versions of proposed variations (Ecodoc Ref: 003016515-01)

Appendix One: DML Schedule 9 sought variations and reasoning.

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
1	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Licenced activities: Interpretation	“wind turbine generator” means a structure comprising a tower, a rotor with 3 blades connected at the hub, a nacelle and ancillary electrical and other equipment which may include J-tubes, transition piece, access and rest platforms, access ladders, boat access systems, corrosion protection systems, fenders and maintenance equipment, helicopter landing facilities and other associated equipment, fixed to a foundation	“wind turbine generator” means a structure comprising a tower, a rotor with 3 blades connected at the hub, a nacelle and ancillary electrical, <u>communication</u> and other equipment which may include J-tubes, transition piece, access and rest platforms, access ladders, boat access systems, corrosion protection systems, fenders and maintenance equipment, helicopter landing facilities and other associated equipment, fixed to a foundation		Chapter 5 Project Description, Section 3.2.77 of the Environmental Statement refers to communication systems being located on the transition piece of the wind turbine generator. See also No. 15
2	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: 2(2)(d)(v)	n/a	n/a	(v) any of the wind turbine generators comprised in Work No. 1B(a) and the offshore converter platform referred to in Work No. 1B(b)(ii);	No connection from the wind turbine generators (WTG) to the offshore converter platform (OCP) was included within the DML which is considered to be a drafting error. The connection is detailed in Chapter 5 of the Environmental Statement and has therefore been assessed in the environmental impact assessment.
3	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(k) foundation scour protection or dredging;	Cable protection has been included as an ancillary work in the DCO and DML. However, there is no allowance for similar requirements for foundations as ancillary works which appears to be a drafting error. Foundation protection has been referenced in Section 3.3 Protection Against Foundation Scour & Subsea Damage of Chapter 5 of the Environmental Statement and considered in technical chapters including Chapter 12 Marine and Intertidal Ecology (Section 7).

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
4	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(l) foundation preparation works including boulder removal and obstruction clearance, dredging and pre-sweeping.	Cable preparation works have been included as an ancillary work in the DCO and DML. However, there is no allowance for similar requirements for foundations as ancillary works which appears to be a drafting error. Foundation preparatory works have been referenced in Section 3.5 Seabed Preparation, Drilling & Disposal of Spoil Arisings of Chapter 5 of the Environmental Statement and considered in technical chapters including Chapter 12 Marine and Intertidal Ecology (Section 6).
5	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(m) the removal, reconstruction or alteration of the position of sub-sea cables and pipelines,	This licenced activity is included as an ancillary work in the DCO (The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015: Part 2 Ancillary Works (f)) but was not included in the DML potentially due to a drafting error.
6	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: (5)	(5) The undertaker must inform the MMO of the location and quantities of material disposed of each month under the Order , by submission of a disposal return by 31st January each year for the months August to January inclusive, and by 31st July each year for the months February to July inclusive.	(5) The undertaker must inform the MMO of the location and quantities of material disposed of each month under the Licence , by submission of a disposal return by 31st January each year for the months August to January inclusive, and by 31st July each year for the months February to July inclusive.	n/a	The reference to the 'Order' should be corrected and replaced by the 'Licence' as it is this consent that the activity is directly licenced under.
7	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 1: Details of licenced activities: (7)	(7) This licence and Marine Licence 4 (as defined in the Order), when taken together, do not authorised the construction of more than 1 Work No. 1B or the construction of Work No. 1B in excess of the maximum parameters for that work set out in Schedule 1 to the Order.	(7) This licence and Marine Licence 4 (as defined in the Order), when taken together, do not authorise the construction of more than 1 Work No. 1B or the construction of Work No. 1B in excess of the maximum parameters for that work set out in Schedule 1 to the Order or the disposal of more than 968,789 cubic metres of material of natural origin within Work No 1.	n/a	Correction of typo. Inclusion of disposal_amount as authorised under Part 1 Licenced Activities: Details of licenced activities: (4).

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
8	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Detailed offshore design parameters (5)	5.— (1) The total number of offshore platforms within Work No. 1B must not exceed 7, comprising— provided that any of the platforms referred to in paragraphs (a) to (c) may be co-joined to create a combined platform fixed to the seabed by multi-leg or gravity base type foundations.	5.—(1) The total number of offshore platforms within Work No. 1B must not exceed 7, comprising— provided that any of the platforms referred to in paragraphs (a) to (c) may be co-joined to create a combined platform fixed to the seabed by monopole , multi-leg or gravity base type foundations.	n/a	The use of monopoles for the Offshore Converter Platform was consented in 2019. The insertion of 'monopole' in this Condition was missing from the April 2019 variation wording.
9	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Detailed offshore design parameters (5)	(9) no offshore accommodation platform or helicopter platform, offshore collector platform or offshore converter platform fixed to the seabed by monopole foundation may— (a) have more than 8 monopoles; (b) have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 3,000 kilojoules.	(9) no offshore accommodation platform or helicopter platform, offshore collector platform or offshore converter platform fixed to the seabed by monopole foundation may— (a) have more than 8 monopoles; (b) have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 4,000 kilojoules.	n/a	Reference to the proposed increase in hammer energy for monopoles from 3,000kJ to 4,000kJ. Supporting technical reports are provided with the DML Variation application. A corresponding amendment is being sought to the DCO.
10	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Detailed offshore design parameters (6)	(2) No wind turbine generator foundation structure employing a footing of driven piles may— (a) have more than 6 driven piles; (b) in the case of single-pile structures, have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 3,000 kilojoules;	(2) No wind turbine generator foundation structure employing a footing of driven piles may— (a) have more than 6 driven piles; (b) in the case of single-pile structures, have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 4,000 kilojoules;	n/a	Reference to the proposed increase in hammer energy for monopoles from 3,000kJ to 4,000kJ. Supporting technical reports are provided with the DML Variation application. A corresponding amendment is being sought to the DCO.
11	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Notifications and Inspections (13)	(1) The undertaker must ensure that— (a) before carrying out any licensed activities, the undertaker informs the MMO of-	(1) The undertaker must ensure that— (a) before carrying out any licensed activities or any phase of those activities , the undertaker informs the MMO of (insofar as relevant to that activity or phase of activity)—	n/a	Text included to allow for the necessary flexibility for notifications and inspections in relation to relevant activities.

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
12	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Notifications and Inspections (13)	(1) The undertaker must ensure that— (iii) the maximum total area and volume for any cable protection HVAC inter-array cables and HVAC inter-platform cables to be constructed within the array area; and	(1) The undertaker must ensure that— (iii) the maximum total area and volume for any HVAC inter-array cables to be constructed within the array area; and	n/a	'Cable protection' removed as the same wording was previously duplicated in Condition 13(1)(iv). This Condition now only relates to the total area and volume of the cables. There will only be a single Offshore Converter Platform so there is no need now to reference inter-platform cables.
13	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Notifications and Inspections (13)	(1) The undertaker must ensure that— (iv) the maximum total area and volume for any cable protection to be constructed within the array area;	(1) The undertaker must ensure that— (iv) the maximum total area and volume for any cable protection to be constructed for the HVAC inter-array cables within the array area;	n/a	This Condition now specifically relates to the total area and volume of the cable protection for the HVAC inter-array cables and corresponds with the proposed variation to 13(1)(iii).
14	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Chemicals, drilling and debris (14)	(3) The undertaker must ensure that no waste concrete slurry or wash water from concrete or cement works is discharged into the marine environment and that concrete and cement mixing and washing areas are contained to prevent run-off entering the water through the freeing ports.	(3) The undertaker must ensure that waste concrete slurry or wash water from concrete or cement works discharged into the marine environment is minimised and that concrete and cement mixing and washing areas are contained to prevent run-off entering the water through the freeing ports. The mixing and use of cement will be managed in accordance with the chemical risk assessment and the marine pollution contingency plan.	n/a	As noted in Section 3.4 of Chapter 5 Project Description of the Environmental Statement, cement may be used as a grouting component. Section 3.4 states that "Grout is typically mixed on offshore construction vessels, and pumped via pipes into the areas required. Where grouting is used, systems of seals, mechanical separation or other operational means would be employed to manage the risk of accidental releases into the environment." As required under the DML all chemicals used in the construction of the authorised scheme must be selected from the list of notified chemicals approved for use by the offshore oil and gas industry under the Offshore Chemicals Regulations 2002 and managed in accordance with the chemical risk assessment and the marine pollution contingency plan. SOWFL will ensure that all precautions are taken to prevent the release of waste concrete slurry or wash water from concrete or cement works into the marine environment, however, there remains the potential for accidental release. SOWFL would request that the Condition recognises this potential.

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
15	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation (16)	<p><i>Construction Method Statement</i></p> <p>(c) a construction method statement in accordance with the construction methods assessed in the environmental statement, including details of-</p> <p>(i) drilling methods and arrangements for disposal of drill arisings, in accordance with the disposal scenario statement;</p> <p>(ii) platform location and installation, including scour protection and foundations which must be those that are able to be completely and safely removed, or reduced to a level below the seabed, at the time of decommissioning;</p> <p><u>(iii) cable installation;</u></p> <p>(iv) impact piling soft start procedures;</p> <p>(v) the source of rock material used in construction and method to minimise contaminants and fines;</p> <p><u>(vi) contractors;</u></p> <p>(vii) vessels;</p> <p><u>(viii) associated works;</u></p> <p>(ix) foundation scour protection requirements in a plan produced following pre- construction surveys identifying where scour protection is most likely to be required (an “intelligent scour protection management plan”); and</p> <p>(x) details of notification of the closure of the disposal site (reference number DG025) on</p> <p><u>(xi) completion of disposal activities;</u></p>	<p><i>Construction Method Statement</i></p> <p>(c) a construction method statement in accordance with the construction methods assessed in the environmental statement, including details of-</p> <p>(i) drilling methods and arrangements for disposal of drill arisings, in accordance with the disposal scenario statement;</p> <p>(ii) platform location and installation, including scour protection and foundations which must be those that are able to be completely and safely removed, or reduced to a level below the seabed, at the time of decommissioning;</p> <p><u>(iii) impact piling soft start procedures;</u></p> <p><u>(iv) the source of rock material used in construction and method to minimise contaminants and fines;</u></p> <p><u>(v) vessels;</u></p> <p><u>(vi) associated works including any temporary communication equipment;</u></p> <p><u>(vii) foundation scour protection requirements in a plan produced following pre- construction surveys identifying where scour protection is most likely to be required (an “intelligent scour protection management plan”); and</u></p> <p><u>(viii) details of notification of the closure of the disposal site (reference number DG025) on completion of disposal activities;</u></p>		<p>DML Schedule 9 Condition 16 (f) requires the production of a Cable Specification and Installation Plan. Within this Condition, full details of the cable specification and installation are required. As such, SOWFL consider that there is duplication in the requirements of Condition 16(c) and 16(f) for cable installation construction methods and request removal of the requirement for details of ‘cable installation’ from Condition 16(c). Relevant conditions from Condition 16(c) Construction Method Statement have been included within Condition 16(f) to ensure all details are incorporated within the Cable Specification and Installation Plan such as to avoid duplication.</p> <p>Old condition: (vi) Contractors may not be confirmed at the time of submission of the Construction Method Statement for approval (likely to be over 4 months prior to commencement of the relevant licenced activity). SOWFL consider that Condition 19 which requires the Reporting of engaged agents, contractors and vessels would satisfy the requirement for identification of Contractors.</p> <p>Old condition: (vii) Indicative details of vessels can be provided in the Construction Method Statement.</p> <p>New condition: (vi) SOWFL have identified that for the purposes of Health and Safety, Search and Rescue and to facilitate communication during construction and operation, that there is the potential for temporary and permanent communication systems to be installed on a number of wind turbine generators.</p> <p>Chapter 5 Project Description, Section 3.2.77 of the Environmental Statement refers to communication systems being located on the transition piece of the wind turbine generator.</p>

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
					<p>Design work for the communication systems are ongoing in discussion with the Maritime and Coastguard Agency. SOWFL will provide details of any systems within the relevant Construction Method Statement.</p> <p>The temporary system, if required, may involve the installation of a container, photovoltaic cells, diesel generator, and small wind generators. Any temporary system of this nature would be removed prior to installation of the wind turbine generator and the installation of a permanent system.</p> <p>Although a temporary communication system is not specifically referred to in Chapter 5, Section 3.2.77 of the Environmental Statement, use of similar equipment to that proposed is covered under "Power supply and generation equipment including photovoltaic cells, small wind generators, battery banks, diesel generators, fuel cells, and associated fuel" and "Control, data recording, and communication equipment" in Section 3.15.5 for the meteorological monitoring stations.</p> <p>As such, the type of equipment proposed for both temporary and permanent communication systems on the wind turbine generators has been defined and assessed within the Environmental Statement.</p> <p>SOWFL confirm that there will be no meteorological stations either fixed to the seabed or utilising a floating support structure anchored to the seabed as part of the project. The type of equipment that may be installed as part of any temporary communication system will instead be situated on the wind turbine generators.</p> <p>Removal of old condition (xi) typing error separating Condition wording.</p>

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
16	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation (16)	<p><i>Cable specification and installation plan</i></p> <p>(f) a cable specification and installation plan following consultation with the relevant statutory nature conservation body, including—</p> <p>(i) technical specification of offshore cables, including a desk-based assessment of attenuation of electro-magnetic field strengths, shielding and cable burial depth in accordance with industry good practice;</p> <p>(ii) a staged cable-laying plan for the Order limits, incorporating a burial risk assessment to ascertain suitable burial depths and cable-laying techniques;</p> <p>(iii) a cable protection plan providing details of the need, type, sources, quality and installation methods for cable protection; and</p> <p>(iv) details of the methodology and extent of a post-lay survey to confirm burial depths.</p>	<p><i>Cable specification and installation plan</i></p> <p>(f) a cable specification and installation plan, following consultation with the relevant statutory nature conservation body including—</p> <p>(i) technical specification of offshore cables, including a desk-based assessment of attenuation of electro-magnetic field strengths, shielding and cable burial depth in accordance with industry good practice;</p> <p>(ii) a staged cable-laying plan for the Order limits, incorporating a burial risk assessment to ascertain suitable burial depths and cable-laying techniques;</p> <p>(iii) a plan <u>produced following pre-construction surveys identifying where scour protection is most likely to be required and</u> providing details of the need, type, sources, quality and installation methods for <u>scour protection and</u> cable protection (<u>an “intelligent scour protection management plan”</u>);</p> <p>(iv) details of the methodology and extent of a post-lay survey to confirm burial depths;</p> <p><u>(v) the source of rock material used in construction and method to minimize contaminants and fines;</u></p> <p><u>(vi) vessels; and</u></p> <p><u>(vii) associated works.</u></p>	n/a	Full details of cable specifications and installation for Works No. 1B to be included within this Plan. Relevant conditions from Condition 16(c) Construction Method Statement have been included within Condition 16(f) to ensure all details are incorporated within the Cable Specification and Installation Plan such as to avoid duplication.
17	Schedule 9, Marine Licence 2: Project	(1) Offshore works must not commence until the MMO, in consultation with the MCA,—	(1) The licenced activities or any phase of those activities (insofar as relevant to that activity or phase of activity) must		A revised template for the Emergency Response and Co-operation Plan (ERCoP) which is a requirement of MGN543 has been provided by the MCA for the project ¹ .

¹ Offshore Renewable Energy Installations, Emergency Response Co-operation Plans (ERCoP): Template for Construction, Operations and Decommissioning Phases, Principle
 Author: P. Lowson, Owner: OELO, HM Coastguard, MCA: Document Identity: Hub ERCoP template – v1.0; Release date August 2019

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
	B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Off-shore Safety Management (18)	<p>(a) has given written approval for an emergency response and co-operation plan (“ERCoP”) that includes full details of the emergency response procedures for the construction, operation and decommissioning phases of the authorised scheme in accordance with the MCA recommendations contained in the OREI guidance; and</p> <p>(b) has confirmed in writing that the undertaker has taken into account and adequately addressed all MCA recommendations contained in the OREI guidance that are appropriate to the authorised scheme.</p> <p>(2) The ERCoP must include the identification of a point of contact for emergency response.</p> <p>(3) The ERCoP must be implemented as approved.</p> <p>(4) In this Condition, “OREI guidance” means MCA document MGN371 “Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues” and its annexes.</p>	not commence until the MMO, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA recommendations as appropriate to the authorised scheme contained within MGN543 “Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues” and its annexes (or subsequent updates).		<p>The ERCoP requires full details of contacts for Emergency Response for all stages of the project (construction, operation and decommissioning) and the document will therefore be updated as the project progresses in consultation with the MCA. SOWFL therefore request that the wording of the condition reflects ongoing engagement with the MCA for the production and updating of the ERCoP and that confirmation in writing from the MMO, in consultation with the MCA is required to demonstrate compliance. [Note: this request mirrors that approved by the MMO for The Dogger Bank Creyke Beck Offshore Wind Farm Order 2015, Schedule 11: DML variation No. 2 (October 2019)]</p> <p>A corresponding amendment is being sought to the DCO.</p>
18	Schedule 9, Marine Licence 2: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Pre-	(2)(b) appropriate high-resolution bathymetric surveys undertaken to International Hydrographic Organisation Order IA standard and side-scan surveys of the areas within the Order limits in which it is proposed to carry out construction	b) appropriate high-resolution bathymetric surveys undertaken to International Hydrographic Organisation Order IA standard and side-scan surveys of the areas within the Order limits in which it is proposed to carry out construction	n/a	SOWFL have agreed through the approval of the Geophysical (Bathymetrical) Monitoring Plan for surveys to be undertaken in appropriate buffer areas relevant to the nature of the asset. For completeness, SOWFL request variation of this condition to reflect the MMO approval of the Monitoring Plan.

No.	Reference	Original Condition	Proposed Condition	New Condition	Justification
	construction monitoring (21)	works, including a <u>500- metre</u> buffer areas around the site of each work. This must include the identification of sites of historic or archaeological interest (A1 and A3 receptors) and any unidentified anomalies larger than 5 metres in diameter (A2 receptors), which may require the refinement, removal or introduction of archaeological exclusion zones and to confirm project-specific micro-siting requirements (for A2 receptors); and	works, including <u>appropriate</u> buffer areas around the site of each work. This must include the identification of sites of historic or archaeological interest (A1 and A3 receptors) and any unidentified anomalies larger than 5 metres in diameter (A2 receptors), which may require the refinement, removal or introduction of archaeological exclusion zones and to confirm project-specific micro-siting requirements (for A2 receptors); and		

Appendix Two: DML Schedule 11 sought variations and reasoning.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
1	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T, 2B, 3B and 2T	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 2B, 3B and 2T	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T	n/a	Addition of Licenced Activity (2) Work No 1B (b) (ii), i.e. ‘1 offshore converter platform situated within the array area and fixed to the seabed by monopole, multileg or gravity base type foundations) (i.e. the OCP) only into Schedule 11 (Marine Licence 4) to reflect the fact that the OCP will be transferred to the Offshore Transmission Owner (OFTO) after construction. Conditions relevant for the OCP will also remain in Schedule 9.
2	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: 2(1)(b)	(1)(b) subject to sub-paragraphs (5) and (6) , the construction of the works specified in sub-paragraph (2) in or over the sea or on or under the sea bed including the removal, reconstruction or alteration of the position of subsea cables and pipelines	(1)(b) subject to sub-paragraphs (7) and (8) , the construction of the works specified in sub-paragraph (2) in or over the sea or on or under the sea bed including the removal, reconstruction or alteration of the position of subsea cables and pipelines	n/a	Amendments to cross-references to reflect insertion of new conditions at Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 2B, 3B and 2T: Part 1: Details of licenced activities: 2(4) and 2(5) See Nos. 7 - 10
3	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: 2(2)(d)(v)	n/a	n/a	(v) any of the wind turbine generators comprised in Work No. 1B(a) and the offshore converter platform referred to in Work No. 1B(b)(ii);	No connection from the WTG to the OCP was included within the DML which is considered to be a drafting error. The connection is detailed in Chapter 5 of the Environmental Statement and has therefore been assessed in the environmental impact assessment.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
4	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(k) foundation scour protection or dredging;	Cable protection has been included as an ancillary work in the DCO and DML. However, there is no allowance for similar requirements for foundations as ancillary works, which appears to be a drafting error. Foundation protection has been referenced in Section 3.3 Protection Against Foundation Scour & Subsea Damage of Chapter 5 of the Environmental Statement and considered in technical chapters including Chapter 12 Marine and Intertidal Ecology (Section 7).
5	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(l) foundation preparation works including boulder removal and obstruction clearance, dredging and pre-sweeping.	Cable preparation works have been included as an ancillary work in the DCO and DML. However, there is no allowance for similar requirements for foundations as ancillary works, which appears to be a drafting error. Foundation preparatory works have been referenced in Section 3.5 Seabed Preparation, Drilling & Disposal of Spoil Arisings of Chapter 5 of the Environmental Statement and considered in technical chapters including Chapter 12 Marine and Intertidal Ecology (Section 6).
6	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T : Part 1: Details of licenced activities: Ancillary works	n/a	n/a	(m) the removal, reconstruction or alteration of the position of subsea cables and pipelines,	This licenced activity is included as an Ancillary Work in the DCO (The Dogger Bank Teesside A and B Offshore Wind Farm Order 2015: Part 2 Ancillary Works (f)) but was not included in the DML potentially due to a drafting error.
7	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B,	n/a	n/a	(4) Subject to the Conditions, this licence authorises the disposal of up to 968,789 cubic metres of material of natural origin within	Condition within DML Schedule 9 also incorporated into DML Schedule 11 as it is relevant for foundation works for the OCP which will be transferred to the OFTO after construction. Condition also remains in Schedule 9.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	3B and 2T: Part 1: Details of licenced activities: (4)			Work No. 1B produced during construction drilling and seabed preparation for foundation works and cable sandwave preparation works (disposal site reference number DG025).	
8	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: (5)	n/a	n/a	(5) The undertaker must inform the MMO of the location and quantities of material disposed of each month under the Licence, by submission of a disposal return by 31st January each year for the months August to January inclusive, and by 31st July each year for the months February to July inclusive.	Condition within DML Schedule 9 also incorporated into DML Schedule 11 as it is also relevant for foundation works for the OCP which will be transferred to the OFTO after construction. Condition also remains in Schedule 9. The Condition in Schedule 9 originally referenced the 'Order', however this is replaced by the 'Licence' as it this consent that the activity is directly licenced under. This variation is also made to the relevant Condition in Schedule 9.
9	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: (7)	(5) This licence does not authorise the construction of the works specified in sub-paragraph (2)(a) or (d)(i), (ii) or (iii)	(7) This licence does not authorise the construction of the works specified in sub-paragraph (2)(d)(i), (ii) or (iii)		Update of condition number.
10	Schedule 11, Marine Licence 4: Project B Offshore Transmission –	(6) This licence and Marine Licence 4 (as defined in the Order), when taken together, do not authorised the construction	(8) This licence and Marine Licence 4 (as defined in the Order), when taken together, do not authorise the construction of more than 1 Work No. 1B	n/a	Correction of typo and update of condition number. Inclusion of disposal_amount as authorised under Part 1 Licenced Activities: Details of licenced activities: (4). This

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	Work Nos. 1B , 2B, 3B and 2T: Part 1: Details of licenced activities: (8)	of more than 1 Work No. 1B or the construction of Work No. 1B in excess of the maximum parameters for that work set out in Schedule 1 to the Order.	or the construction of Work No. 1B in excess of the maximum parameters for that work set out in Schedule 1 to the Order or the disposal of more than 968,789 cubic metres of material of natural origin within Work No 1.		is required to facilitate construction of the OCP under DML Schedule 11.
11	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Detailed offshore design parameters (4)	(1) The total number of offshore platforms within Work No. 1B must not exceed 7, comprising— provided that any of the platforms referred to in paragraphs (a) to (c) may be co-joined to create a combined platform fixed to the seabed by multi-leg or gravity base type foundations.	(1) The total number of offshore platforms within Work No. 1B must not exceed 7, comprising— provided that any of the platforms referred to in paragraphs (a) to (c) may be co-joined to create a combined platform fixed to the seabed by monopole , multi-leg or gravity base type foundations.	n/a	The use of monopoles for the Offshore Converter Platform was consented in 2019. The insertion of ‘monopole’ in this Condition was missing from the April 2019 variation wording.
12	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Detailed offshore design parameters (4)	(9) no offshore accommodation platform or helicopter platform, offshore collector platform or offshore converter platform fixed to the seabed by monopole foundation may— (a) have more than 8 monopoles; (b) have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 3,000 kilojoules.	(9) no offshore accommodation platform or helicopter platform, offshore collector platform or offshore converter platform fixed to the seabed by monopole foundation may— (a) have more than 8 monopoles; (b) have a pile diameter exceeding 12 metres or employ a hammer energy during installation exceeding 4,000 kilojoules.	n/a	Reference to the proposed increase in hammer energy for monopoles from 3,000kJ to 4,000kJ. Supporting technical reports are provided with the DML Variation application. A corresponding amendment is being sought to the DCO.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
13	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Detailed offshore design parameters (7)	(1) Within Work Nos. 1B, 2B and 3B, the HVDC cables must not, in total, exceed— (a) 2 in number; (b) 1 fibre-optic cable; (c) 484.4 kilometres in length.	1) Within Work Nos. 1B, 2B and 3B, the HVDC cables must not, in total, exceed— (a) 2 in number; (b) 2 fibre-optic cables; (c) 484.4 kilometres in length.	n/a	The limit of one fibre-optic cable is considered to be a drafting error. The Environmental Statement fully assessed the potential for two fibre-optic cables in Chapter 5 Project Description so the variation is requested to be increased to two fibre-optic cables in the event that the export cables are laid separately.
14	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Layout rules (10A)	n/a	n/a	10A.—(1) The positions of wind turbine generators and offshore platforms must be arrayed in accordance with the parameters applicable to Work No. 1B specified in the Conditions and the principles in section 5.2 of Chapter 5 of the environmental statement. (2) The construction of wind turbine generators or offshore platforms must not commence until the array location and layout plan has been agreed. (3) The construction of wind turbine generators and offshore platforms must be carried out in accordance	Condition within DML Schedule 9 also incorporated into DML Schedule 11 to reflect the fact that the OCP will be transferred to the OFTO after construction. Condition also remains in Schedule 9.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
				with the array location and layout plan.	
15	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Notifications and Inspections (11)	<p>(1) The undertaker must ensure that—</p> <p>(a) before carrying out any licensed activities, the undertaker informs the MMO of—</p> <p>(i) the organisation undertaking the licensed activities and its primary point of contact;</p> <p>(ii) the works being undertaken pursuant to this licence comprising those works necessary up to the point of connection with the generation assets including (without limiting paragraph 2)—</p> <p>(aa) up to 4 offshore collector platforms; and</p> <p>(bb) a network of cables for the transmission of electricity and electronic communications;</p>	<p>(1) The undertaker must ensure that—</p> <p>(a) before carrying out any licensed activities or any phase of those activities, the undertaker informs the MMO of <u>(insofar as relevant to that activity or phase of activity)—</u></p> <p>(i) the organisation undertaking the licensed activities and its primary point of contact;</p> <p>(ii) the works being undertaken pursuant to this licence comprising those works necessary up to the point of connection with the generation assets including (without limiting paragraph 2)—</p> <p>(aa) <u>the offshore converter platform;</u> and</p> <p>(bb) a network of cables for the transmission of electricity and electronic communications;</p>	n/a	<p>(a) Text included to allow for the necessary flexibility for notifications and inspections in relation to relevant activities.</p> <p>(aa) Condition revised to incorporate the OCP (as opposed to the offshore collector platforms) into DML Schedule 11 to reflect the fact that the OCP will be transferred to the OFTO after construction.</p>
16	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B,	(8) The undertaker must ensure that a notice to mariners is issued at least 10 working days before commencement of the licensed activities or any phase of them advising of the	(8) The undertaker must ensure that a notice to mariners is issued at least 10 working days before commencement of the licensed activities or any phase of them advising of the	n/a	Inclusion of 'Work Nos. 1B' into DML Schedule 11 to reflect the fact that the OCP will be transfer to the OFTO after construction.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	3B and 2T Part 2: Conditions: Notifications and Inspections (11)	mencement of the licensed activities or any phase of them advising of the commencement date of Work Nos. 2B and 3B and the expected vessel routes from the local construction ports to the relevant locations.	commencement date of Work Nos. 1B, 2B and 3B and the expected vessel routes from the local construction ports to the relevant locations.		
17	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Chemicals, drilling and debris (12)	(3) The undertaker must ensure that no waste concrete slurry or wash water from concrete or cement works is discharged into the marine environment and that concrete and cement mixing and washing areas are contained to prevent run-off entering the water through the freeing ports.	(3) The undertaker must ensure that waste concrete slurry or wash water from concrete or cement works discharged into the marine environment is minimised and that concrete and cement mixing and washing areas are contained to prevent run-off entering the water through the freeing ports. <u>The mixing and use of cement will be managed in accordance with the chemical risk assessment and the marine pollution contingency plan.</u>	n/a	As noted in Section 3.4 of Chapter 5 Project Description of the Environmental Statement, cement may be used as a grouting component. Section 3.4 states that “Grout is typically mixed on offshore construction vessels, and pumped via pipes into the areas required. Where grouting is used, systems of seals, mechanical separation or other operational means would be employed to manage the risk of accidental releases into the environment.” As required under the DML all chemicals used in the construction of the authorised scheme must be selected from the list of notified chemicals approved for use by the offshore oil and gas industry under the Offshore Chemicals Regulations 2002 and managed in accordance with the chemical risk assessment and the marine pollution contingency plan. SOWFL will ensure that all precautions are taken to prevent the release of waste concrete slurry or wash water from concrete or cement works into the marine environment, however, there remains the potential for accidental release. SOWFL would request that the Condition recognises this potential.
18	Schedule 11, Marine Licence 4: Project B Offshore	Na/	n/a	<i>Array location and layout plan</i>	Condition wording within DML Schedule 9 also incorporated into DML Schedule 11 where relevant to reflect the

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation (14)			(a) an array location and layout plan to be agreed in writing by the MMO following consultation with Trinity House and the MCA that details— (i) the specification, dimensions, foundation types and depth of the offshore converter platform; (ii) the proposed location, including grid co-ordinates of the centre point of the proposed offshore converter platform; (iii) the location and specification of vessel moorings and other permanent ancillary works as agreed by the MMO, to ensure compliance with the parameters applicable to Work No. 1B specified in the Conditions and the principles in section 5.2 of the environmental statement;	fact that the OCP will be transferred to the OFTO after construction. Condition also remains in Schedule 9.
19	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2:	<i>Cable specification and installation plan</i> (a) a cable specification and installation plan to be agreed in consultation with Trinity House and the MCA that shows the	n/a (all condition wording removed)	n/a	Condition wording combined with Schedule 11, Marine Licence 4: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation (14)(f) cable Specification and installation plan to avoid duplication.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	Conditions: Pre Construction Plans and Documentation (14)	route of the cable to ensure conformity with the description of Work Nos. 2B and 3B. The plan is to include co-ordinates of the transmission works within Work Nos. 1B, 2B and 3B			
20	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T : Part 2: Conditions: Pre Construction Plans and Documentation: 14	<i>Construction Method Statement</i> (c) a construction method statement in accordance with the construction methods assessed in the environmental statement, including details of- (i) drilling methods and arrangements for disposal of drill arisings, in accordance with the disposal scenario statement; (ii) platform location and installation, including scour protection and foundations which must be those that are able to be completely and safely removed, or reduced to a level below the seabed, at the time of decommissioning; <u>(iii) cable installation;</u> <u>(iv) cable installation between MHWS and MLWS</u> (v) impact piling soft start procedures; (vi) the source of rock material used in construction and	<i>Construction Method Statement</i> (c) a construction method statement in accordance with the construction methods assessed in the environmental statement, including details of- (i) drilling methods and arrangements for disposal of drill arisings, in accordance with the disposal scenario statement; (ii) platform location and installation, including scour protection and foundations which must be those that are able to be completely and safely removed, or reduced to a level below the seabed, at the time of decommissioning; <u>(iii)</u> impact piling soft start procedures; <u>(iv)</u> the source of rock material used in construction and method to minimise contaminants and fines; <u>(v)</u> vessels; <u>(vi)</u> associated works; <u>(vii)</u> foundation scour protection requirements in a plan produced following pre- construction surveys identifying where scour protection is most	n/a	(iii) DML Schedule 11 Condition 14 (f) requires the production of a Cable Specification and Installation Plan. Within this Condition, full details of the cable specification and installation for Works No 2B and Works No. 3B are required (see No. 21). As such, SOWFL consider that there is duplication in the requirements of Condition 14(c) and 14(f) for cable installation methods for Works No. 2B and request removal of the requirement for details of <i>(iii) cable installation</i> and <i>(iv) cable installation between MHWS and MLWS</i> from Condition 14(c). Relevant conditions have been included within Condition 14(f) to ensure all details are incorporated within the Cable Specification and Installation Plan. Old condition: (vii) Contractors may not be confirmed at the time of submission of the Construction Method Statement for approval (likely to be over 4 months prior to commencement of the relevant licenced activity). SOWFL consider that Condition 19 which requires the Reporting of engaged agents, contractors and vessels would satisfy the requirement for identification of Contractors. Old condition: (viii) Indicative details of vessels can be provided in the Construction Method Statement.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
		method to minimise contaminants and fines; <u>(vii) contractors;</u> (viii) vessels; (ix) associated works; (x) foundation scour protection requirements in a plan produced following pre-construction surveys identifying where scour protection is most likely to be required (an “intelligent scour protection management plan”); and <u>(xi) (xi)</u> details of notification of the closure of the disposal site (reference number DG025) on completion of disposal activities;	likely to be required (an “intelligent scour protection management plan”); and <u>(viii) details of notification of the closure of the disposal site (reference number DG025) on completion of disposal activities;</u>		Removal of old condition (xi) typing error and renumbering in accordance with removed conditions.
21	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation: 14	<i>Cable specification and installation plan</i> (f) a cable specification and installation plan following consultation with the relevant statutory nature conservation body, including— (i) technical specification of offshore cables, including a desk-based assessment of attenuation of electro-magnetic field strengths, shielding and	<i>Cable specification and installation plan</i> (f) a cable specification and installation plan, following consultation with Trinity House, the MCA and the relevant statutory nature conservation body that shows the route of the cable to ensure conformity with the description of Work Nos. 2B and 3B , including— (i) technical specification of offshore cables, including a desk-based assessment of attenuation of electro-magnetic field strengths, shielding and cable burial depth in accordance with industry good practice;	n/a	Condition wording combined with wording of Schedule 11, Marine Licence 4: Project B Offshore Generation – Work Nos. 1B and 2T: Part 2: Conditions: Pre Construction Plans and Documentation (14)(a) Cable Specification and installation plan (now proposed to be removed) to avoid duplication (see No. 19). Full details of cable specifications and installation for Work No. 2B and Work No. 3B to be included within this Plan. Relevant conditions from Condition 14(c) Construction Method Statement have been included within Condition 14(f) to ensure all details are incorporated within the Cable Specification and Installation Plan such as to avoid duplication.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
		<p>cable burial depth in accordance with industry good practice;</p> <p>(ii) a staged cable-laying plan for the Order limits, incorporating a burial risk assessment to ascertain suitable burial depths and cable-laying techniques;</p> <p>(iii) a <u>cable protection</u> plan providing details of the need, type, sources, quality and installation methods for cable protection; and</p> <p>(iv) details of the methodology and extent of a post-lay survey to confirm burial depths.</p>	<p>(ii) a staged cable-laying plan for the Order limits, incorporating a burial risk assessment to ascertain suitable burial depths and cable-laying techniques;</p> <p>(iii) a plan <u>produced following pre-construction surveys identifying where scour protection is most likely to be required and</u> providing details of the need, type, sources, quality and installation methods for <u>scour protection and</u> cable protection (<u>an "intelligent scour protection management plan"</u>);</p> <p>(iv) details of the methodology and extent of a post-lay survey to confirm burial depths;</p> <p><u>(v) co-ordinates of the transmission works within Work Nos. 1B, 2B and 3B;</u></p> <p><u>(vi) the source of rock material used in construction and method to minimize contaminants and fines;</u></p> <p><u>(vi) contractors;</u></p> <p><u>(viii) vessels; and</u></p> <p><u>(ix) associated works.</u></p>		<p>It would be SOWFL intention to produce:</p> <p>(a) Landfall Horizontal Directional Drill (HDD) Cable Specification and Installation Plan for Works No. 3B and part of Works No. 2B (up to exit point of landfall HDD below MLWS)</p> <p>(b) Export Cable Specification and Installation Plan for remaining extent of Works No. 2B (from exit point of landfall HDD) to Works No. 1B</p>
22	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Pre Construction Plans	<i>Cofferdam method statement</i> (iv) in the event that a temporary cofferdam is constructed in Work No. 3B, a cofferdam method statement for the monitoring and redistribution of sediment, to be agreed in writing by the MMO.	<i>Cofferdam method statement</i> (i) in the event that a temporary cofferdam is constructed in Work No. 3B, a cofferdam method statement for the monitoring and redistribution of sediment, to be agreed in writing by the MMO. The cofferdam method statement must include details of the installation and	n/a	To amend numbering to identify that the 'Cofferdam Method Statement' is a separate Pre-Construction Plan.

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
	and Documentation: 14	The cofferdam method statement must include details of the installation and management of the temporary cofferdam.	management of the temporary cofferdam.		
23	Schedule 11, Marine Licence 4: Project B Offshore Transmission – Work Nos. 1B , 2B, 3B and 2T: Part 2: Conditions: Offshore Safety Management (16)	<p>(1) Offshore works must not commence until the MMO, in consultation with the MCA,—</p> <p>(a) has given written approval for an emergency response and co-operation plan (“ERCoP”) that includes full details of the emergency response procedures for the construction, operation and decommissioning phases of the authorised scheme in accordance with the MCA recommendations contained in the OREI guidance; and</p> <p>(b) has confirmed in writing that the undertaker has taken into account and adequately</p>	<p>(1) The licenced activities or any phase of those activities (insofar as relevant to that activity or phase of activity) must not commence until the MMO, in consultation with the MCA, has confirmed in writing that the undertaker has taken into account and, so far as is applicable to that stage of the project, adequately addressed all MCA recommendations as appropriate to the authorised scheme contained within MGN543 “Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues” and its annexes (or subsequent updates).</p>		<p>A revised template for the Emergency Response and Co-operation Plan (ERCoP) which is a requirement of MGN543 has been provided by the MCA for the project². The ERCoP requires full details of contacts for Emergency Response for all stages of the project (construction, operation and decommissioning) and the document will therefore be updated as the project progresses in consultation with the MCA. SOWFL therefore request that the wording of the condition reflects ongoing engagement with the MCA for the production and updating of the ERCoP and that confirmation in writing from the MMO, in consultation with the MCA is required to demonstrate compliance. [Note: this request mirrors that approved by the MMO for The Dogger Bank Creyke Beck Offshore Wind Farm Order 2015, Schedule 11: DML variation No. 2 (October 2019)]</p> <p>A corresponding amendment is being sought to the joint Teesside A and Sofia DCO.</p>

² Offshore Renewable Energy Installations, Emergency Response Co-operation Plans (ERCoP): Template for Construction, Operations and Decommissioning Phases, Principle Author: P. Lowson, Owner: OELO, HM Coastguard, MCA: Document Identity: Hub ERCoP template – v1.0; Release date August 2019

	Reference (amended to include Works No. 1B and revised numbering where appropriate)	Original Reference / Condition	Proposed Referenced / Condition (amended also to include updated Condition numbering)	New Condition	Justification
		<p>addressed all MCA recommendations contained in the OREI guidance that are appropriate to the authorised scheme.</p> <p>(2) The ERCoP must include the identification of a point of contact for emergency response.</p> <p>(3) The ERCoP must be implemented as approved.</p> <p>(4) In this Condition, "OREI guidance" means MCA document MGN371 "Offshore Renewable Energy Installations (OREIs) – Guidance on UK Navigational Practice, Safety and Emergency Response Issues" and its annexes.</p>			