



Defence Infrastructure Organisation

Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

Your Reference: EN010136

Tel: [REDACTED]

Our Reference: DIO10055489

Email: [REDACTED]

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

16 January 2025

By email only

Dear Sir / Madam

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

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

This letter is submitted in response to the Examining Authority's written questions which were issued on 19 December 2024. Responses are provided to those questions marked for the attention of the Ministry of Defence (Defence Infrastructure Organisation). The wording of those questions addressed to Ministry of Defence (MOD) have been used to structure this response.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, technical sites or maritime defence assets and interests.

AR 2.1 – Aviation and Radar Mitigation Progress Report

The D4 update to the Aviation Mitigation Progress Report [REP4-028] now includes 'next steps' and expected timescales for conclusion of agreement as requested by the ExA at ISH2.

Could all listed aviation and radar IPs confirm if the Applicant's summary of progress is correct and provide any necessary updates.

The issues set out within the Aviation Mitigation Progress Report (Document Ref. S_D4_18 Version F02) most relevant to MOD interests are detailed on the row titled 'Defence Infrastructure Organisation (DIO) (DIO.AR.15) (REP1-032)'.

The MOD confirm that the reason for submitting an objection response to this proposed development is that the development would be detectable to and have an unacceptable impact on the operation and capability of a Primary Surveillance Radar sited at BAE Warton.

The MOD is unable to move from this position of objecting until such time as the applicant has submitted a proposed mitigation scheme that, following both technical and operational assessment, is considered viable. At that time the MOD may be in a position to offer/discuss the drafting of requirement(s) to secure such mitigation.

At this time no mitigation has been submitted and MOD cannot agree to the use of a requirement to secure any, as yet unspecified, mitigation.

AR 2.4– Very High Frequency (VHF) Communications

The Applicant and BAe notified the ExA at ISH2 that the matter of potential effects to VHF communications was a newly emerging issue since production of the ES, which has arisen from recent CAA advice relating to onshore wind farms.

The Applicant is asked to:

- i) Clarify whether an assessment from NATS has now been commissioned (the progress report [REP4-028] states it is ‘commissioning’ an assessment) and advise the likely timescale for its production and submission.
- ii) Clarify whether potential effects to VHF communications should be considered as part of the EIA process.

The Applicant and the listed IPs are asked to:

- iii) Provide a summary of the ongoing discussions on this VHF matter.
- iv) Provide the wording of a preferred (without prejudice) DCO requirement in the event that the matter is not resolved and/or a commercial agreement is not reached before the end of the Examination. This should also be recorded in the final SoCGs.

The MCA is asked to:

- v) Clarify if the VHF matter arising from recent CAA advice is an issue for search and rescue operations and confirm this within the final version of your SoCG.

At this time MOD have no comment to make on the potential effects of the development on VHF Communications.

AR 2.5 – Aviation and Radar Monitoring

The Applicant and BAE Systems stated at ISH2 that monitoring beyond initial testing following completion of the wind turbines is not required, so long as mitigation is demonstrated to be effective (point 51 in [REP4-006]). The parties are asked to include this within the next version of the SoCG.

The Applicant is also asked to confirm agreement on whether operational monitoring is required with the other aviation and radar IPs in their respective SoCGs.

Whilst not identified as a party to respond to this issue, the MOD has submitted an objection to the proposed development on the basis that the development would be detectable to and have an unacceptable impact on the operation and capability of a Primary Surveillance Radar sited at BAE Warton.

It is noted that point 47. c. of ‘Written Summaries - Issue Specific Hearing 2’ (Document Ref. S_D4_4 Version F01) records that ‘the Applicant explained that it has engaged with the DIO jointly with the Mona Offshore Wind Farm and has agreed upon a requirement that will be inserted into both the Morgan and Mona DCOs’. This does not reflect the MOD position. The MOD is unable to move an objection position until such time as the applicant has submitted a proposed mitigation scheme that, following both technical and operational assessment, is considered viable. At that time the MOD may be in a position to offer/discuss the drafting of requirement(s) to secure such mitigation.

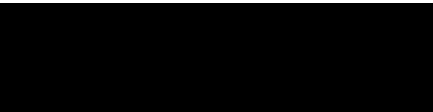
Given that it is unknown what form of mitigation would be proposed, or potentially implemented, it is not possible to make a definitive statement as to what monitoring requirements may be identified in order to evaluate the efficacy of such mitigation.

At such time as the applicant is able to submit a proposed mitigation the MOD will engage with the applicant to determine a more detailed process for evaluating that mitigation and accepting that it is appropriately functional.

I trust this adequately explains the MOD position in response to relevant questions within the Examining Authority's written questions issued 19 December 2024.

Please do not hesitate to contact me should you require any additional information, or should you wish to discuss matters.

Yours sincerely

A solid black rectangular box used to redact the signature of Teena Oulaghan.

Teena Oulaghan
Safeguarding Manager