

**Morgan Generation Assets DCO – ExQ2 – Blackpool Airport Responses**

<b>ExQ2</b>	<b>Question to:</b>	<b>Question</b>	<b>Response</b>
AR 2.1	BAE Systems Blackpool Airport Defence Infrastructure Organisation/ Ministry of Defence Isle of Man Government Territorial Seas Committee (Ronaldsway Airport) NATS En-Route plc	<p><b>Aviation and Radar Mitigation Progress Report</b></p> <p>The D4 update to the Aviation Mitigation Progress Report [REP4-028] now includes ‘next steps’ and expected timescales for conclusion of agreement as requested by the ExA at ISH2.</p> <p>Could all listed aviation and radar IPs confirm if the Applicant’s summary of progress is correct and provide any necessary updates.</p>	<p>In respect of IFPs:</p> <p>The Five-Year Review (Safeguarding Assessment) of IFPs to Runway 28 has been received, reviewed internally and forwarded to the Civil Aviation Authority for their comment and feedback.</p> <p>The Five-Year Review of IFPs to Runway 10 has not yet been received. Upon receipt, Blackpool Airport will review internally prior to submission to the Civil Aviation Authority.</p> <p>Blackpool Airport cannot give assurances or undertakings as to when the CAA will complete their review and subsequently provide comment and feedback.</p> <p>The Airport disagrees with the suggestion in the Aviation Mitigation Progress Report [REP4-028] that a requirement is not appropriate or necessary on the basis there is “no certainty an impact will arise”. Whether impacts on MSA (Minimum Sector Altitude) and IFPs will be adequately mitigated through the changes sought in the Five-Year Review submissions depends on the outcome of the CAA review process. The Airport has no control over the outcome or speed of the CAA approval process. To the extent the CAA approvals have not been obtained by the end of the examination, the Airport submits that a requirement will be necessary in order to ensure that any appropriate mitigation can ultimately be secured – please see the Airport’s response to AR 2.3 ii) in this regard.</p>

			<p>In respect of VHF:</p> <p>The Airport awaits an update from the Applicant as to NATS's assessment of Morgan Generation Assets' impact on VHF, as well as DF (direction finding), systems at the Airport, and is separately commissioning its own assessment from its consultants Cyrrus.</p> <p>The Airport disagrees with the statement in the Aviation Mitigation Progress Report [REP4-028] that an impact on VHF communications is not likely. As noted at AR 2.4, this matter has recently been raised by the CAA. In addition, impacts have recently been identified and/or the risk of such impacts provided for in respect of other similar offshore windfarm NSIPs (for example Mona Offshore Windfarm), and as such it is reasonable for the Airport (and other IPs) to raise this as a concern on the present scheme.</p>
AR 2.3	Applicant Blackpool Airport	<p><b>Blackpool Airport Five Year Review</b></p> <p>The SoCG with Blackpool Airport (BA.AR.12 [REP1-028]) and the Aviation Mitigation Progress Report [REP3-007] note that a safeguarding assessment is currently being undertaken with an update to the airport's five year review (with other relevant Irish Sea projects) which is anticipated to be submitted to the Civil Aviation Authority (CAA) in October/November 2024.</p> <p>i) Blackpool Airport is asked to submit to the Examination at Deadline 5 a summary of the results of the assessment, a timeline on when it is likely to be approved by the CAA,</p>	<p>i) The Five-Year Review process is ongoing. See response at AR 2.1 in respect of IFPs. The full assessment will not be completed, or the full extent of impacts known, prior to close of examination.</p> <p>ii) A broad form of requirement, which provides for appropriate mitigation to be secured in respect of identified impacts on the Airport's operational and air traffic services, is attached to these responses. The wording of this requirement largely reflects the terms of a draft requirement recently agreed between the Airport and the Applicant of the Mona Offshore Windfarm Generation Assets DCO in respect of that scheme.</p>

		<p>the likely mitigation, and when this is likely to be agreed between the parties. The Applicant may also wish to respond.</p> <p>ii) If such agreement is expected to be after the conclusion of the Examination (10 March 2025) the Applicant is asked to provide the wording of any Requirement for the draft Development Consent Order.</p>	
AR 2.4	<p>Applicant Blackpool Airport Ronaldsway Airport BAE Systems for Walney and Warton Aerodromes Defence Infrastructure Organisation Maritime and Coastguard Agency NATS En-Route plc</p>	<p><b>Very High Frequency (VHF) Communications</b></p> <p>The Applicant and BAe notified the ExA at ISH2 that the matter of potential effects to VHF communications was a newly emerging issue since production of the ES, which has arisen from recent CAA advice relating to onshore wind farms.</p> <p>The Applicant is asked to:</p> <p>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.</p> <p>ii) Clarify whether potential effects to VHF communications should be considered as part of the EIA process.</p> <p>The Applicant and the listed IPs are asked to:</p> <p>iii) Provide a summary of the ongoing discussions on this VHF matter.</p> <p>iv) Provide the wording of a preferred (without prejudice) DCO requirement in the event that</p>	<p>iii) The Airport was made aware of potential VHF communications issues by the Civil Aviation Authority following the concerns raised during ISH2.</p> <p>The Airport is aware that the applicant of another offshore windfarm NSIP currently undergoing examination (Morecambe Offshore Wind Farm Generation Assets) has requested quotations from NATS to independently assess the impacts of their windfarm on VHF and DF systems at the Airport. The Airport is not aware of any similar assessment having been commissioned by the Applicant of the present scheme, but would support this, and request the opportunity for any such assessment to be reviewed by the Airport’s own consultants, Cyrrus.</p> <p>iv) Please see the Airport’s response to AR 2.3 ii) – the Airport proposes a single, broader form of requirement to secure appropriate mitigation against any impacts on its operational and air traffic services, and draft wording to this effect is attached to these responses.</p>

		<p>the matter is not resolved and/or a commercial agreement is not reached before the end of the Examination. This should also be recorded in the final SoCGs.</p> <p>The MCA is asked to:</p> <p>v) Clarify if the VHF matter arising from recent CAA advice is an issue for search and rescue operations and confirm this within the final version of your SoCG.</p>	
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**Appendix: Draft form of DCO Requirement for Blackpool Airport**

**Operation of Blackpool Airport**

- [x].—(1) No part of any wind turbine generator (excluding foundations) shall be erected as part of the authorised development until the Secretary of State, having consulted with the Operator and the CAA, has confirmed in writing that s/he is satisfied that:
- (i) Appropriate Mitigation will be implemented and maintained throughout the lifetime of the authorised development; and
  - (ii) appropriate arrangements have been put in place with the Operator to ensure that such Appropriate Mitigation is so implemented and maintained.
- (2) For the purposes of this requirement—
- “Appropriate Mitigation”** means appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the Operator to provide safe airport operational and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding communication systems) for Blackpool Airport;
- “Approved Mitigation”** means the Appropriate Mitigation agreed with the CAA and the Operator and approved by the Secretary of State in accordance with sub-paragraph (1);
- “CAA”** means the Civil Aviation Authority constituted by the Civil Aviation Act 1982; and
- “Operator”** means Blackpool Airport Operations Limited (incorporated in England and Wales with company number 09307995 and whose registered office is Number One Bickerstaffe Square, Talbot Road, Blackpool FY1 3AH), or such other organisation as is licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services for Blackpool Airport.
- (3) The undertaker shall thereafter comply with all obligations contained within the Approved Mitigation throughout the lifetime of the authorised development.