

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Aviation and Radar Mitigation summary note

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Image of an offshore wind farm

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Contents

1	AVIATION AND RADAR MITIGATION SUMMARY	1
1.1	Introduction	1
1.2	Summary of aviation and radar mitigation, how it is secured and key next steps.....	1

Tables

Table 1.1:	Summary of aviation and radar mitigation, how it is secured and key next steps.....	2
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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).
The Planning Inspectorate	The agency responsible for operating the planning process for applications for development consent under the Planning Act 2008.

Acronyms

Acronym	Description
DCO	Development Consent Order
BA	Blackpool Airport
IFP	Instrument Flight Procedures
IP	Interested Party
ISH3	Issue Specific Hearing 3
MOD DIO	Ministry of Defence, Defence Infrastructure Organisation
MSA	Minimum Sector Altitude
OSP	Offshore Substation Platforms
PSR	Primary Surveillance Radar
RA	Ronaldsway Airport
UHF	Ultra High Frequency
VHF	Very High Frequency

1 AVIATION AND RADAR MITIGATION SUMMARY

1.1 Introduction

1.1.1.1 Following discussions on aviation and radar matters at ISH3, the Applicant considers that rather than update the existing Aviation Mitigation Progress Report (REP5-020) it would be more beneficial to the Examining Authority to have a summary table for aviation mitigation under discussion with the respective Interested Parties (IPs). The purpose of this table is therefore, to highlight the Applicant's understanding of the mitigation measures that could be required, identify the key next steps and their status, and provide clarity as to how any potential mitigation is secured in all cases through the draft DCO.

1.1.1.2 The Applicant considers that the information presented below demonstrates that the Applicant has a clear understanding of the potential concerns raised, what work is required (and by whom) to clarify whether any mitigation will be needed, and that where necessary appropriate industry standard requirements have been proposed to control the matter where there are ongoing actions that cannot be closed out at this stage (as is common place for this topic).

1.2 Summary of aviation and radar mitigation, how it is secured and key next steps

1.2.1.1 Aviation and radar mitigation, how it is secured, and the key next steps are summarised below in Table 1.1.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Table 1.1: Summary of aviation and radar mitigation, how it is secured and key next steps.

Aviation IP	Issue	Mitigation	Is mitigation secured	Key next steps
NATS	Impact on Primary Surveillance Radar (PSR)	Radar blanking and an air space change for a transponder mandatory zone (TMZ). The Applicant has agreed to cover the costs for implementation of mitigation through a commercial agreement.	Yes - DCO Requirement 4. Wording of requirement agreed with NATS.	<ul style="list-style-type: none"> • Applicant & NATS: Finalise commercial agreement • NATS: Subject to finalising the commercial agreement, write to Secretary of State to confirm 'objection' removed.
Ronaldsway Airport (RA)	Impact on PSR	New wind turbine resilient PSR to be purchased and commissioned as part of a surveillance strategy implemented by the IP to address several proposed offshore and onshore wind energy projects. The Applicant has agreed to part cover the costs for implementation of mitigation through a commercial agreement.	Yes - DCO Requirement 8. Wording of requirement agreed with RA.	<ul style="list-style-type: none"> • Applicant & RA: Finalise commercial agreement • RA: Implement surveillance strategy
Blackpool Airport (BA)	Potential impact on Instrument Flight Procedures (IFP) and Minimum Sector Altitude (MSA)	BA in process of updating 5-year review of safety procedures, which will identify any mitigation requirements. Mitigation is expected to be an increase to the MSA and amendment to the associated flight procedures. The Applicant has agreed to cover the costs for implementation of the mitigation by BA through a commercial agreement.	Yes – DCO Requirement 9. Wording of Requirement aligned with Mona project requirement as requested by BA at ISH3, but not agreed as BA have since requested that implementation of any mitigation occurs prior to installation of offshore substation platforms (OSP). The Applicant does not agree that this additional restriction has any technical merit for the potential effects on IFP/MSA and has the potential to cause significant schedule risk to the project, and therefore considers the request by BA to be unnecessary and unreasonable.	<ul style="list-style-type: none"> • Applicant & BA: Finalise commercial agreement for implementation of mitigation. • BA: Complete 5-year review. • BA: Implement mitigation.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Aviation IP	Issue	Mitigation	Is mitigation secured	Key next steps
	Potential impact on radio (VHF) communications	<p>The need for and nature of any mitigation is still to be determined and subject to an operational assessment on radio communications by BA's consultants, Cyrrus Limited.</p> <p>The Applicant has agreed to cover the costs of the operational assessment.</p>	<p>Yes – DCO Requirement 9.</p> <p>Wording of Requirement aligned with Mona project requirement as requested by BA at ISH3, but not agreed as BA have since requested that implementation of any mitigation occurs prior to installation of offshore substation platforms (OSP). The Applicant does not agree that this additional restriction has any technical merit for the potential effects on VHF and has the potential to cause significant schedule risk to the project, and therefore considers the request by BA to be unnecessary and unreasonable.</p>	<ul style="list-style-type: none"> • Applicant & BA: Finalise commercial agreement for assessment costs. • BA: Undertake operational assessment on radio communications. • Applicant & BA: Engage on results of the operational assessment, and subject to its results agree any next steps including implementation of any mitigation required.
BAE Systems Marine Limited (BAE) Walney Aerodrome	Potential impact on MSA	<p>Mitigation is expected to comprise an increase to the MSA and amendment to the associated flight procedures. Exact mitigation requirements subject to a new assessment being undertaken by BAE's consultant, NATS Services Limited, against an agreed scope, which has been commissioned by the Applicant and is now underway.</p> <p>The Applicant has agreed to cover the costs for implementation of the mitigation by BAE (where required) through a commercial agreement.</p>	<p>Yes – DCO Requirement 7.</p> <p>Wording of Requirement not agreed with BAE as BAE are not in a position to discuss the DCO requirement until the assessments being undertaken by NATS are completed and the conclusions considered. It is the Applicants position that Requirement 7 is perfectly adequate to secure any necessary mitigation.</p>	<ul style="list-style-type: none"> • Applicant & BAE: Finalise commercial agreement for implementation of mitigation. • Applicant: Complete assessment to identify mitigation requirements • BAE: Implement mitigation.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Aviation IP	Issue	Mitigation	Is mitigation secured	Key next steps
	Potential impact on radio (VHF) communications	The need for and nature of any mitigation is still to be determined and subject to an assessment being undertaken by BAE's consultant, NATS Services Limited, against an agreed scope, which the Applicant has commissioned and is now underway.	<p>Yes – If required, secured through DCO Requirement 7.</p> <p>Wording of Requirement not agreed with BAE as BAE are not in a position to discuss the DCO requirement until the assessments being undertaken by NATS are completed and the conclusions considered. It is the Applicants position that Requirement 7 is perfectly adequate to secure the mitigation.</p>	<ul style="list-style-type: none"> Applicant: Complete operational assessment on radio communications which is currently underway. Applicant & BAE: Engage on results of assessment and subject to results, agree next steps including implementation of any mitigation required.
BAE Systems Operations Limited (BAE) Warton Aerodrome	Impact on PSR	<p>Mitigation options range from a new wind turbine resilient PSR to adaption/updates to the PSR currently being commissioned.</p> <p>The Applicant has (following ISH3) submitted a 'Mitigation Strategy' to MOD DIO, who have confirmed that the next step will be for BAE to undertake a technical and operational assessment of the proposed mitigation (see also MOD DIO).</p>	<p>Yes – DCO Requirement 6.</p> <p>Wording of Requirement to be agreed with MOD DIO (see MOD DIO).</p>	<ul style="list-style-type: none"> BAE: Undertake technical and operational assessments to determine if the mitigation is acceptable and provide feedback to MOD DIO Safeguarding Team.
	Potential impact on IFP and MSA	<p>Mitigation is expected to be an increase to the MSA and amendment to the associated flight procedures. Exact mitigation requirements subject to a new assessment being undertaken by BAE's consultant, NATS Services Limited, against an agreed scope, which has been commissioned by the Applicant and is underway.</p> <p>The Applicant has agreed to cover the costs for implementation of the mitigation by BAE (where required) through a commercial agreement.</p>	<p>Yes – DCO Requirement 5.</p> <p>Wording of Requirement not agreed with BAE as BAE are not in a position to discuss the DCO requirement until the assessments being undertaken by NATS are completed and the conclusions considered. It is the Applicants position that Requirement 5 is perfectly adequate to secure the mitigation.</p>	<ul style="list-style-type: none"> Applicant & BAE: Finalise commercial agreement for implementation of mitigation. Applicant: Complete assessment to identify mitigation requirements BAE: Implement mitigation.

MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Aviation IP	Issue	Mitigation	Is mitigation secured	Key next steps
	Potential impact on radio (VHF and UHF) communications	The need for and nature of any mitigation is still to be determined and subject to an assessment by the BAE's consultant, NATS Services Limited, against an agreed scope, which the Applicant has commissioned and is now underway.	<p>Yes – If required, secured through DCO Requirement 5.</p> <p>Wording of Requirement not agreed with BAE as BAE are not in a position to discuss the DCO requirement until the assessments being undertaken by NATS are completed and the conclusions considered. It is the Applicants position that Requirement 5 is perfectly adequate to secure the mitigation.</p>	<ul style="list-style-type: none"> • Applicant: Complete operational assessment on radio communications which is currently underway. • Applicant & BAE: Engage on results of assessment and subject to results, agree next steps including implementation of any mitigation required.
MOD DIO	Impact on PSR at Warton	<p>Mitigation options range from a new wind turbine resilient PSR to adaption of PSR currently being commissioned.</p> <p>The Applicant has (following ISH3) submitted a 'Mitigation Strategy' to MOD DIO, who have confirmed that the next step will be for BAES to undertake a technical and operational assessment of the proposed mitigation (see also BAES Warton).</p>	<p>Yes – DCO Requirement 6.</p> <p>Agreement on the wording of the Requirement is subject to completion of technical and operational assessments of the mitigation (see key next steps).</p>	<ul style="list-style-type: none"> • BAE: Undertake technical and operational assessments of mitigation to determine acceptability and feedback to MOD DIO Safeguarding Team. • MOD DIO: Subject to point 1 above, MOD DIO to write to Secretary of State to confirm that 'objection' is removed and confirm whether Requirement 6 in the Draft DCO is appropriate or provide a revised Requirement.