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Name:	FAO David Wagstaff
Department:	Energy Infrastructure Planning Delivery
Planning Inspectorate Reference:	EN010136
Applicant's Reference:	S_RfI3_02 (F01)

15 August 2025

Subject: Morgan Offshore Wind Project: Generation Assets – Application for Development Consent Order, Planning Inspectorate reference EN010136

Dear Sir

This submission is made by Morgan Offshore Wind Limited (the “Applicant”) in connection with the submissions of BAE Systems Marine Limited (re Walney Aerodrome) and BAE Systems Operations Limited (re Warton Aerodrome) (together “BAE Systems”) made on 8 August in response to the Secretary of State’s Consultation Letter dated 25 July 2025. For the reasons set out below, the Applicant wishes to confirm its position that a detailed response to the submissions of BAE Systems is unnecessary and therefore does not consider further consultation with the Applicant to be required.

The submission by BAE Systems (including the three appendices) is stated to confirm their position in respect of requirement wording and the status of commercial agreements. In doing so, the submission includes a considerable amount of technical information and narrative that was not submitted during the Examination, was not provided in response to earlier Secretary of State consultations, and has not previously been shared with the Applicant. The Applicant does not consider it appropriate to respond to that information at this stage in the DCO process for the reasons set out below and given the ample opportunity for it to have been provided earlier and that it is inconsequential to the DCO requirement.

As set out in the responses of both the Applicant and BAE Systems, the key question for the purpose of determining the DCO is considered to be whether a ‘no mitigation’ limb should be included in the relevant requirements (requirements 5 and 7) that secure mitigation for air traffic services at Walney Aerodrome and Warton Aerodrome. The parties are otherwise in agreement on the wording of a suitable requirement to secure the necessary mitigation and that any detailed mitigation scheme (including any commercial agreement) will be progressed post-consent.

The Applicant considers that the submission of BAE Systems demonstrates that there is still ongoing work and technical uncertainty. The Applicant’s previous submissions have provided detailed justification for why the additional step of a ‘no mitigation’ provision is reasonable and appropriate. The technical uncertainty and lack of agreement between BAE Systems and the Applicant as to the necessity of mitigation for some impacts supports that position.

The Applicant notes that BAE Systems submitted a joint statement with Blackpool Airport that provides commentary in relation to ongoing technical work concerning any potential interaction between the Morgan Generation Assets and VHF communications. Again, the Applicant does not

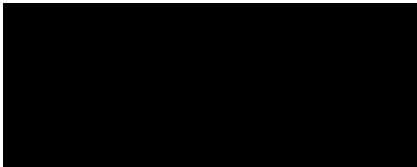
Morgan Offshore Wind Limited is a company registered in England and Wales, with a registered address at Chertsey Road, Sunbury On Thames, Middlesex, United Kingdom, TW16 7BP and company registration number 13497271.

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consider this material to the question under consideration for the purpose of determining the DCO, which is whether mitigation is adequately secured by requirements. Blackpool Airport and the Applicant submitted a joint statement in response to the Secretary of State's Consultation Letter dated 25 July 2025 confirming that the DCO requirement (requirement 9) wording was agreed.

The Applicant hopes that this clarification is of assistance in confirming that no further consultation on the material submitted by BAE Systems is required.

Yours faithfully,



Peter Gaches

Morgan Consents Lead