



# Defence Infrastructure Organisation

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**By email only**

Dear David

## **MOD Safeguarding – Warton Aerodrome**

**Proposal:** Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for an Order Granting Development Consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets: Transmission assets associated with the Morgan Offshore Wind Project and the Morecambe Offshore Windfarm including: offshore export cables, onshore landfall infrastructure, onshore export cables, onshore substations, onshore grid connection cables and circuit breaker compounds, and other related onshore infrastructure

**Location:** From Morgan and Morecambe arrays to Penwortham Substation outside of Preston (landfall at Crusader Bank between Blackpool and Lytham St Anne's)

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (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, and technical sites or training resources such as the Military Low Flying System.

The applicant seeks an Order granting Development Consent for assets that would transmit the electricity generated by both the Morgan and Morecambe Offshore Wind Farms to a grid connection at the existing Penwortham Substation. The proposed Transmission Assets (TAs) include:

- the installation of up to 484km of offshore export cables,
- a landfall site where offshore cables would be linked to onshore cables;

- the installation of up to 17km of onshore export cables;
- two new substations (one each for Morgan Offshore Wind Farm and Morecambe Offshore Wind Farm) with both situated North-east of Hall Cross and West of Newton-le-Scales; and
- biodiversity and environmental enhancements across seven sites.

The application site/development corridor occupies statutory safeguarding zones surrounding and associated with Warton Aerodrome, an aerodrome used by both military and civilian aircraft. At its closest point the application site/development corridor is within 1.7km of the aerodrome boundary. The application site/development corridor is within/passes through safeguarding zones designated to preserve the operation and capability of the aerodrome by requiring consultation where development would introduce environments that may support or attract those large and/or flocking bird species hazardous to aviation safety, where development reaches or exceeds certain heights above ground level, and where development by virtue of its location, nature, scale, massing, or external materials has the potential to degrade the operation and/or capability of technical assets which facilitate air traffic management.

### **Birdstrike**

The application site is within a zone where the potential for a development to provide a habitat or other environment attractive to large and/or flocking bird species is of particular concern. The proposed application site/development corridor, specifically the proposed sub stations and associated environmental mitigation and biodiversity benefit areas, has the potential to attract or support hazardous bird species within an area where aircraft are at critical stages of flight resulting in a reduction to aviation safety.

The applicant's submission identifies that, close to each of the two proposed new onshore substations, new waterbodies are to be created which would replace a number of existing smaller ponds. The waterbody proposed close to the Morgan onshore substation would result in the creation of a significantly larger area of open water which would be more attractive to both waterfowl and gulls than the existing smaller waterbodies. This larger waterbody has the potential to attract large and/or flocking bird species from the River Ribble and the Ribble Estuary which may result in the movement of birds across the aerodrome as well as through airspace where aircraft from take-off and/or to land at Warton Aerodrome. The creation of such a waterbody close to the aerodrome would, without the provision of details necessary to assess the potential to form an attractant (specifically relating to the form, operation, and maintenance of the waterbody), be considered unacceptable. Given the proximity of the development corridor to Warton Aerodrome and the potential for the development to result in the degradation of aviation safety the MOD must, at this time, **object** to the proposal.

It should be noted that this objection may be addressed through the submission of additional data which sets out the following:

- specifics for each of the proposed waterbodies to include location and site plans, section plans which clearly show bank profile and water level (taking into account 1:30 and 1:100 storm events);
- where waterbodies are designed to drain to dry, details of the drain to dry time given storm events (1:30 and 1:100); and
- proposed maintenance measures and schedules to ensure any designed drain to dry time does not increase.

Across the wider development corridor hedgerow, scrub, and woodland planting are proposed. Extensive planting of species with high proportions of fruit, berry, and hip bearing plants may result in a significant increase in availability of these food sources for hazardous flocking birds, including Starlings, winter thrushes and Wood Pigeon. In addition, the management of soil as may be produced through the installation of cables has the capacity to provide a food source for hazardous flocking bird species. The proximity of these potential food sources/feeding habitat to Warton Aerodrome have the potential to attract hazardous bird flocking species resulting in the detriment of aviation safety.

It is noted that the applicant's draft Development Consent Order (September 2024) makes provisions for the submission and approval of a written landscaping scheme (Schedule 2A, Requirement 6 and Schedule 2B, Requirement 6), and for the submission and approval of a Code of Construction Practice, which identifies a requirement for a soil management plan (Schedule 2A, Requirement 8 and Schedule 2B, Requirement 8), which would address these concerns. To ensure that appropriate assessments can be completed, the MOD should be identified as consultee for each of these requirements.

## **Aerodrome Height**

The proposed development site occupies statutory safeguarding zones designed to preserve aviation safety by ensuring that the three-dimensional air space above and surrounding an aerodrome is kept free of obstacles. This three-dimensional airspace is defined by a series of obstacle limitation surfaces, drawn using aerodrome data including runway dimensions, which allow the height of proposed development to be assessed to see whether it would reduce aviation safety by forming an obstacle to aircraft operating from and/or around that aerodrome.

Whilst the majority of the development proposed would be unlikely to have any significant impact on these obstacle limitation surfaces, there are elements, specifically the lightning protection masts detailed at paragraph 1.2.2.18 in the Outline Landscape Management Plan (Document Ref: J2 Rev: F01 dated September 2024), that may result in the introduction of obstructions that penetrate obstacle limitation surfaces degrading aviation safety for those aircraft arriving at, or departing from, Warton Aerodrome. This impact may be addressed by the submission of additional data, specifically the location and height above ground level of these elements of the development. It is likely that the MOD would require that obstacles are fitted with aviation safety lighting and the submission of sufficient information to ensure obstacles can be appropriately charted in order to address these concerns.

It is acknowledged that the applicant's draft Development Consent Order (September 2024) contains requirements for the submission of Detailed Design Parameters (Schedule 2A, Requirement 5 and Schedule 2B, Requirement 5) however the submission of details of the potentially harmful element, the lightning protection masts is not necessitated by the wording proposed. The potential for the lightning protection masts to introduce an obstacle to aircraft may be addressed by supplementing the wording of the requirement with a stipulation that details of the locations and maximum heights of all structures/elements with a maximum height of, or exceeding, 15.2m above ground level should form part of the Detailed Design Parameters and identifying that the MOD is a consultee for the purpose of this requirement.

In addition to the completed development introducing an obstacle to aircraft, the implementation of a development of this type may require the use of tall construction equipment or plant such as cranes. The deployment of plant or equipment which has a height of, or exceeding, a height of 15.2m above ground level would introduce obstacles that may degrade aviation safety.

This impact may be addressed by adding a requirement for a Construction Environment Management Plan which identifies the plant/equipment proposed to be deployed, the periods for which it would be present in given development areas, and the lighting that would be displayed on it. The MOD should be identified as a consultee for the purposes of that requirement.

## **Technical**

The application site also falls within safeguarding zones defining areas where the height of a given development, the materials used in its construction, and introduction of sources of electro-magnetic fields/interference may impact on the operation of technical assets deployed at Warton Aerodrome. These technical assets may include surveillance equipment such as radars, navigational equipment such as Instrument Landing Systems and Precision Approach Radars, communication equipment, and other types of technical installations supporting operational defence or national security requirements.

After reviewing the plans and documentation provided in the application the MOD have no technical safeguarding objections to the application development.

## **Offshore Export Cable Route and Landfall**

After reviewing the plans and documentation provided in the application and received from the applicant the MOD have no safeguarding objection to the offshore export cable route and landfall aspects of this application.

## **Summary**

The MOD must **object** to this application on the grounds that insufficient information is currently available to allow necessary assessments to be completed for the potential for the development to result in an increased risk of birdstrike and degradation of aviation safety.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed in the developer's documents titled "Environmental Statement, Volume 1, Chapter 3: Project Description (Rev: ES01, dated December 2024)", "Environmental Statement, Volume 3, Chapter 11: Aviation and Radar (Rev ES Issue, dated September 2024)", Outline Ecological Management Plan (Rev: F01, dated September 2024)" and "Onshore Biodiversity Benefit Statement (Rev F02, dated December 2024)". Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Assistant Safeguarding Manager  
DIO Safeguarding