



Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited for the Morgan and Morecambe Offshore Wind Farms Transmission Assets

The Examining Authority's written questions and requests for information (ExQ1)

Issued on 17 June 2025

The following table sets out the Examining Authority's (ExA's) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework generally derived from the initial assessment of principal issues provided as **appendix C** to the Rule 6 Letter dated 28 March 2025. Questions have been added to the framework of issues as they have arisen from representations and to address the assessment of the application against relevant policies.

Column 2 of the table indicates which interested parties (IP) and other persons each question is directed to. Where there are several sub-questions to different parties, those from whom a response is requested are set out in brackets. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests.

Each question has a unique reference number. For example, the first question is identified as Q1.1.1. When you are answering a question, please start your answer by quoting the unique reference number, clearly identifying it as relating to ExQ1.

You should respond to the questions by using the **Have your say** function on the [project page of the National Infrastructure website](#) and selecting 'Responses to Examining Authority's written questions' when asked.

Download a copy of this Microsoft Word version of the ExA's written questions, enter your answers and save the document using an appropriate file name. You can then submit the completed document by selecting 'Upload files'.

Responses are due by deadline 3: Monday 7 July 2025



Abbreviations used:

| | | | |
|--------|---------------------------------------------------------------------------------------|-------|----------------------------------------------------|
| BBC | Blackpool Borough Council | ISH | issue specific hearing |
| BNG | biodiversity net gain | LCC | Lancashire County Council |
| CA | Compulsory acquisition | LIR | local impact report |
| CE | The Crown Estate | LSE | likely significant effect |
| CfD | Contract for Difference | MCA | Maritime and Coastguard Agency |
| CoCP | Code of Construction Practice | MCZ | Marine Conservation Zone |
| CoT | Commitment reference | MEEB | Measures of Equivalent Environmental Benefit |
| D1/2/3 | deadline 1/2/3 | MMO | Marine Management Organisation |
| DCO | Development Consent Order | MOD | Ministry of Defence |
| dDCO | draft Development Consent Order | MOWL | Morgan Offshore Wind Limited |
| EA | Environment Agency | NCFPC | Newton with Clifton and Freckleton Parish Councils |
| EIA | Environmental Impact Assessment | NE | Natural England |
| EPS | European protected species | NERC | Natural Environment Research Council |
| ES | Environmental Statement | NFFO | National Federation of Fishermen's Organisations |
| EWG | Lancashire Association of Local Councils Fylde Area Committee Energy Working Group | NFU | National Farmers' Union |
| ExA | Examining Authority | NGET | National Grid Electricity Transmission plc |
| FBC | Fylde Borough Council | NH | National Highways |
| HGV | heavy goods vehicles | NPS | National Policy Statement |
| HRA | Habitats Regulations Assessment | NR | Network Rail Infrastructure Limited |
| IP | interested party | NRW | Natural Resources Wales |
| ISAA | Information to Support an Appropriate Assessment | oCoCP | outline Code of Construction Practice |



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| oCTMP | outline Construction Traffic Management Plan | SAC | Special Area of Conservation |
| ODP | Outline Design Principles | SoCG | Statement of Common Ground |
| OEIST | Orsted East Irish Sea Transmission Limited | SoR | Statement of Reasons |
| oESP | outline Employment and Skills Plan | SPA | Special Protection Area |
| oSMP | outline Soil Management Plan | SRBC | South Ribble Borough Council |
| PA2008 | Planning Act 2008 | TJB | Transition joint bay |
| PCC | Preston City Council | TPO | Tree Preservation Order |
| PRoW | public right(s) of way | UXO | Unexploded Ordnance |
| RNLI | Royal National Lifeboat Institution | WT | Wildlife Trust |

The Examination Library

References in these questions set out in square brackets (for example [APP-010]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link: [EN020032-000718-Morgan and Morecambe Offshore Wind Farms Examination Library.pdf](#)

It will be updated as the examination progresses.

Citation of questions

Questions in this table should be cited as follows:

Question reference: issue reference: question number, for example ExQ1 1.1.1 – refers to the first question in this table.



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| 1. | The draft Development Consent Order (dDCO) | |
| <p>The Examining Authority's (ExA) initial questions on the dDCO are set out below.</p> <p>Further questions and consideration of relevant outstanding matters will be examined at a subsequent issue specific hearing (ISH) to be held in week commencing 28 July 2025. The ExA is aware that discussions are taking place outside of the examination with relevant interested parties on the content and drafting of the dDCO.</p> <p>These discussions are encouraged, and parties are asked to provide details of outstanding unresolved matters (in Statements of Common Ground where previously requested) at deadline 3 to assist with the ExA's consideration of which development consent order matters require examination at an ISH.</p> | | |
| 2.3 Schedule 2A and 2B - Requirements | | |
| Q2.3.3 | FBC, SRBC, PCC, LCC, Blackpool Borough Council, Natural England, Historic England, Environment Agency and any interested party | <p>Remaining issues relating to the requirements will be considered at a subsequent issue specific hearing on the dDCO and further written questions if required. In order to provide for the efficient use of hearing time, the local authorities and any other relevant party are requested to consider the drafting of the draft requirements in Schedule 2 (A and B) and provide details of any disagreed matters, along with alternative drafting where applicable and any suggested additional requirements.</p> <p>Where applicable this may be done within the Statement of Common Ground between the applicants and the relevant interested party.</p> <p>BAE Systems has the following comments to make on the latest version of the Draft Development Consent Order (Examination Library Document Ref: REP2-004) ("dDCO").</p> <p><u>Schedule 2A, Requirements – Project A, Requirement 5, Detailed Design Parameters Onshore and Schedule 2B, Requirements – Project B, Requirement 5, Detailed Design Parameters Onshore</u></p> <p>As set out in its comments on the Applicants' responses to the Deadline 1 Action Points (see Section 3.0 of BAE Systems' "Deadline 2 – Comments on Submissions Made at Deadline 1" (Examination Library Document Ref: REP2-052)), BAE Systems has requested that the detailed design parameters (onshore) which are included in the dDCO Requirements refer to maximum heights above ordnance datum ("AOD"), rather than finished ground level. AOD provides a fixed reference point which is needed to inform the aviation safeguarding assessments to which BAE Systems has referred in its submissions to date and because finished ground levels are not currently known or identified in the dDCO.</p> <p>We note that the detailed design parameters (onshore) contained in the dDCO submitted by the Applicants at Deadline 2 (Requirement 5 of both Schedule 2A and Schedule 2B) still refer to maximum heights above</p> |

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| | | <p>finished ground level. BAE Systems request the following amendments to Requirement 5 (Detailed Design Parameters Onshore) for both Project A (Schedule 2A) and Project B (Schedule 2B):</p> <p><u>Schedule 2A, Requirement 5</u></p> <p><i>“5. (1) In relation to Work No. 21A-</i></p> <ul style="list-style-type: none"> <i>(a) The highest part of any building must not exceed 15 XXXm above finished ground level ordnance datum;</i> <i>(b) The highest part of any external electrical equipment, excluding lightning rods, must not exceed 15 XXXm above finished ground level ordnance datum;</i> <i>(c) The total area of the fenced compound (excluding its accesses) must not exceed 80,000 m²; and</i> <i>(d) The total number of lightning rods within the fenced compound area must not exceed 14 and the height of any lightning rods must not exceed 30 XXXm above finished ground level ordnance datum.”</i> <p><u>Schedule 2B, Requirement 5</u></p> <p><i>“5. (1) In relation to Work No. 21B-</i></p> <ul style="list-style-type: none"> <i>(a) The highest part of any building must not exceed 15 XXXm above finished ground level ordnance datum;</i> <i>(b) The highest part of any external electrical equipment, excluding lightning rods, must not exceed 15 XXXm above finished ground level ordnance datum;</i> <i>(c) The total area of the fenced compound (excluding its accesses) must not exceed 29,700 m²; and</i> <i>(d) The total number of lightning rods within the fenced compound area must not exceed 8 and the height of any lightning rods must not exceed 30 XXXm above finished ground level ordnance datum.”</i> <p>The Applicants will need to confirm the maximum heights AOD for insertion in sub-paragraphs 5(a), (b) and (d) above.</p> |

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| | | <p><u>Schedule 2A, Requirement 12: Ecological Management Plan and Schedule 2B, Requirement 12: Ecological Management Plan</u></p> <p>Regarding Requirement 12 (Schedule 2A and Schedule 2B of the dDCO), BAE Systems welcomes its inclusion at sub-paragraph (1)(c) as one of the parties with whom the Local Planning Authority (“LPA”) is required to consult in the process of approving the ecological management plan (“EMP”). However, the correct BAE entity is BAE Systems (Operations) Ltd and not BAE Systems Plc.</p> <p>At the point Requirement 12 is being discharged, a <u>detailed</u> Wildlife Hazard Management Plan (“WHMP”) (which is in accordance with the <u>outline</u> WHMP) should have been prepared and included as an appendix to the EMP (subject of Requirement 12). Furthermore, it needs to be clear from the requirement wording that in consulting with BAE and the other stakeholders identified, confirmation of their <u>express and written agreement</u> to the EMP (or, in the case of BAE and BAOL, the detailed WHMP) is required to be obtained by the LPA. We request that Requirement 12 is amended to take account of these points.</p> <p>We also query whether sub-paragraph (3) of the Requirement should reference the <u>approved</u> EMP rather than the <u>outline</u> EMP.</p> |
| 4. Aviation and radar | | |
| Q4.1.3 | The applicants | <p>Warton Aerodrome</p> <p>It is stated in response to action point 40 [REP1-037] that “BAE Systems confirmed during the Issue Specific Hearing (ISH) 1 Agenda item 6(c) that safeguarding assessments are to be undertaken by BAE Systems on behalf of Warton Aerodrome.” That is not quite the recollection of the Examining Authority (ExA) as whilst assessments might normally be undertaken by BAE, the specific bird strike risk arising from the proposed creation of the biodiversity areas would be a direct consequence of the proposed development and responsibility for such an assessment would normally fall with the applicant. Whilst it is said that the issue was not raised by BAE until January 2025, this appears to have still allow sufficient time for an assessment. It is not clear why the applicants have rejected this request. In these circumstances, how would the applicants suggest that the ExA address this outstanding issue in its recommendation to the Secretary of State?</p> |

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| | | <p>We note that this question is addressed to the Applicants. However, we wish to confirm that the ExA's recollection is correct.</p> <p>As explained in BAE Systems' Deadline 2 submissions (see pages 7 and 8 of Examination Library Document Ref: REP2-052), BAE Systems is the party responsible for undertaking (or commissioning) safeguarding assessments in relation to Obstacle Limitation Surfaces (OLS), Communication Navigation and Surveillance (CNS), and Instrument Flight Procedures (IFP). However, the Applicants, as the party proposing the authorised development and creating the new environmental mitigation areas and biodiversity benefit sites, would be responsible for undertaking any bird strike risk assessment (as per the "agent of change" principle contained in the National Planning Policy Framework (December 2024)).</p> <p>It should also be noted that BAE Systems did raise concerns over the potential for changes to habitats in the area to attract birds in representations made to the Applicants in November 2023 at the pre-application stage. Whilst these representations did not explicitly refer to a bird strike risk assessment, they did refer to Warton Aerodrome's 13km wildlife hazard safeguarding / management zone.</p> <p>Regarding the OLS, CNS, and IFP safeguarding assessments, BAE Systems (as previously indicated) requires a firm and binding commitment from the Applicants to be responsible for the costs associated with the completion of such assessments before commissioning them. This assurance is still awaited.</p> <p>Further, in paragraph 2.4 of their deadline 2 (D2) submission [REP2-052], BAE Systems say that it "received a request from the applicant (s) one day before deadline 2 (D2) for information to inform the baseline scenario... to Wildlife Hazard Management Plan. The amount of information requested is significant and BAE Systems needs to consider whether there are any commercial sensitivities that may preclude the sharing of some information." Please clarify and update in the light of these circumstances, how is it also suggested that the ExA addresses this outstanding issue in its recommendation to the Secretary of State?</p> <p>BAE Systems is willing to work with the Applicants and to provide them with what information it can in order to enable the Applicants to undertake a bird strike risk assessment and to develop a detailed WHMP and any other appropriate mitigation / management measures which may be required. However, BAE Systems have confirmed to the Applicants the need for a Non-Disclosure Agreement ("NDA") to be entered into as a pre-condition to any information sharing. Discussions in relation to the terms of the NDA are ongoing.</p> |

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| Q4.1.4 | The applicants | <p>Warton Aerodrome In paragraph 2.5 of their D2 submission [REP2-052], BAE are critical of the Statement of Common Ground (SoCG) supplied saying that the “SoCG covered numerous topics that were not of relevance to BAE Systems’ concerns or the discussions taking place between the applicants and BAE Systems. The ExA requests that this SoCG is significantly progressed by Deadline 3 and submitted to the examination.</p> <p>BAE Systems met with the Applicants on 2 July 2025 to discuss the SoCG – specifically, an appropriate structure for the SoCG and the topic areas it should cover. In follow up to this meeting, the Applicants issued an updated version of the SoCG to BAE Systems on 7 July 2025 which is in the process of being reviewed. It will not be possible to report significant progress to the ExA until the parties have settled the structure of the SoCG and agreed the ‘position statements’ against which confirmations of agreement and disagreement can be provided. This will enable meaningful discussions between the Applicants and BAE Systems to commence. At the discretion of the ExA, BAE Systems has agreed with the Applicant to submit the SoCG following Deadline 3 and in advance of Issue Specific Hearing 2.</p> |
| Q4.1.5 | BAE Systems | <p>Warton Aerodrome In addition to the comments at ISH1, BAE have lodged further comments [REP1-112] and again at D2 [REP2-052] emphasising the need and scope for a bird strike assessment at this stage. There is a particular concern over the creation of the biodiversity area at Lea Marsh Fields and BAE do not believe that mitigation strategies are appropriate until there is a better understanding of the possible bird strike risk. In view of the latest response from the applicants [REP1-037], is BAE any closer to undertaking an assessment?</p> <p>As detailed in the response to Q4.1.3 above, the Applicant is the party responsible for undertaking any bird strike risk assessment. The Applicants have prepared a “Strategy for Wildlife Hazard Management Plan” (submitted to the examination at Deadline 2 – Examination Library Document Ref: REP2-047). This sets out the Applicants’ approach to / proposed scope for assessing current bird populations and how they move around the area, as well as briefly describing how the Applicants propose to mitigate any increase in the risk to operations at Warton Aerodrome. BAE Systems welcomes this; however, the scope of the outline WHMP does not include any assessment of how the existing / baseline bird strike risk may be altered by the introduction of the proposed environmental mitigation areas and biodiversity benefit sites.</p> |

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| | | <p>As BAE Systems has repeatedly stated, it is essential that the Applicants undertake a bird strike risk assessment in order to identify potential changes in bird numbers, concentrations, and movement / migration patterns which may be precipitated by the authorised development and the resultant risk posed to operations at Warton Aerodrome. The results of this assessment can then sensibly inform a discussion in respect of mitigation and the appropriate measures which are required to be implemented in order to address any adverse operational outcomes.</p> <p>BAE Systems is willing to work with the Applicants and to provide them with what information it can in order to enable the Applicants to undertake a bird strike risk assessment and to develop a detailed WHMP and any other appropriate mitigation / management measures which may be required. However, as stated in the response to Q4.1.3 above, an NDA is required to be put in place as a pre-condition to any information sharing.</p> <p>Will this be required by the Civil Aviation Authority?</p> <p>BAE Systems currently manages wildlife hazard risk within the 13km wildlife safeguarding zone around Warton Aerodrome. Under the terms of its licence, BAE Systems is required to demonstrate to the Civil Aviation Authority (“CAA”) that it is adequately managing risk. To do so, it must provide the CAA with the following information:</p> <ul style="list-style-type: none"> • a 13km aerodrome wildlife survey; • a Wildlife and Habitat Hazard Management Plan; • a Term Safety Plan (which includes a bird strike risk assessment); and • a Strike Rate Probability Index, which tracks and monitors bird strikes and assesses risk to Warton Aerodrome. <p>BAE Systems is required to keep the above-mentioned information under review. The documents listed will require updating to consider the “post-development risk” arising from the authorised development and BAE Systems will be reliant upon the provision of sufficient information from the Applicants to complete the required updates.</p> <p>BAE Systems will need to be satisfied that the “post-development risk” arising from the authorised development is capable of being appropriately mitigated in order that it can discharge its duty under the</p> |

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| | | <p>terms of its licence with the CAA and demonstrate that the wildlife hazard risk at Warton Aerodrome is being adequately managed.</p> <p>What is the latest position concerning discussion over other aviation safeguarding assessments?</p> <p>See the response to Q4.1.3 above.</p> |
| Q4.1.6 | The applicants | <p>Warton Aerodrome</p> <p>The concerns relating to bird strike have been echoed in the submission [REP1-075] from the Defence Infrastructure Organisation which represents the Ministry of Defence (MoD). Currently the MoD are objecting to the application due to the risk of bird strike arising from the creation of the new water areas. Their representation on the second page sets out additional information which may address their concerns. The applicants previously resisted further detail when this was raised at ISH1 but will they now reconsider this position?</p> <p>We note that this question is directed to the Applicants and have no comment to make. BAE Systems will await and consider the Applicants' response.</p> |
| Q4.1.7 | The applicants and BAE Systems | <p>Warton Aerodrome</p> <p>Reference was made at ISH1 to the outstanding representations from BAE to both the Morgan and Morecambe offshore wind farm Development Consent Order (DCO) applications. Agreement as to the primary surveillance radar system was still outstanding and it seems [REP1-037] that this "remains an ongoing point of discussion for both generation assets." The relevance to this DCO application is whether there is a positive working relationship between the parties or whether there is ongoing disagreement. Please advise?</p> <p>As the ExA will be aware, the DCO for the Mona Offshore Wind Farm ("OWF") was granted on 4 July 2025. The DCO includes a Requirement in respect of adverse impacts arising from the authorised development upon the Primary Surveillance Radar ("PSR") at Warton Aerodrome (see Requirement 23). The Requirement is in the form of BAE Systems' proposed (and preferred) wording, save for the fact that a turbine shutdown / cessation of the OWF provision has not been included. BAE Systems is considering its position in this regard and its implications for the scope and content of the post-consent radar mitigation scheme (subject of Requirement 23) which is to be agreed. Furthermore, BAE Systems' operational</p> |

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| | | assessment, the purpose of which is to assess the viability of the current mitigation solution put forward in respect of the PSR at Warton Aerodrome, is ongoing. BAE Systems will continue to make every effort to work with and to foster a positive and constructive relationship with the applicants of the various OWF projects currently impacting Warton and Walney Aerodromes, including the Applicants. |
| Q4.1.8 | Morgan Offshore Wind Limited | <p>Warton Aerodrome</p> <p>Following from the above, BAE Systems have submitted a representation at D2 [REP2-053] in response to action point 41 [REP1-111] saying “However, the latest submissions of the applicant for the Mona Project are a significant backward step..., with the applicant looking to revisit a number of detailed drafting points which BAE Systems had thought were settled (owing to their inclusion in the latest draft DCOs for the Morgan and Morecambe Projects). Accordingly, an agreement in respect of the PSR (sic: “Primary Surveillance Radar”) requirement wording continues to feel some way off.” They continue by saying “This is a disappointing turn of events which has taken our client somewhat by surprise, it being raised very late in the day without any prior discussion between the Applicant and BAE Systems and given that the Morgan and Mona Project Teams are one in (and?) the same.”</p> <p>This appears to undermine the relationship between this applicant and BAE Systems, and it is important that this position is resolved quickly so that the ExA can have some confidence that negotiations concerning this project are progressed positively. What assurances can be given that a similar situation will not arise with this application?</p> <p>We refer the ExA to our response to Q4.1.7 above.</p> <p>Whilst BAE Systems remains committed to working with the Applicants, the pace of progress to resolve the key areas of concern which BAE Systems has raised in its submissions to date is slow. Noting the stage which the examination has reached, there is still a considerable amount of work to be done and information to be provided. Furthermore, having regard to the Applicants submissions at Deadlines 1 and 2, there continues to be disagreement between the parties as to the steps which need to be taken in order to properly identify and quantify the risk posed by the authorised development to aviation safety and aerodrome / airport operations. The impacts which the authorised development will give rise to on the existing baseline are required to be clearly understood before an appropriate and robust mitigation / management strategy can be formulated. This is a basic, fundamental first step which the Applicant has, so far, been unwilling to commit to undertaking which is significantly hampering meaningful progress to be</p> |

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| | | made towards resolution of BAE Systems' very serious concerns in respect of bird strike and the safeguarding of aerodrome / air traffic service operations. |
| Q4.1.9 | The applicants | <p>Warton Aerodrome BAE systems in the final paragraph of their D2 submission [REP2-053] remind all parties that the MoD are still objecting to all three DCO applications where the examinations have now concluded (being the Mona, Morgan and Morecambe DCOs). If the Secretary of State issues his decisions on these applications during the period of this examination, then the position with these objections may become clearer but if not, the issue of aviation will be a very difficult area for the ExA to report on the cumulative effects on the Warton Aerodrome. Any clarity the applicants can bring to this would be helpful.</p> <p>We note that this question is directed to the Applicants. BAE Systems will await and consider the Applicants' response.</p> <p>We wish to note that, notwithstanding the grant of the DCO for the Mona OWF, the MoD's objection to the project remains in place. In its response to the Secretary of State's request for further information (Consultation 1) (Document Ref. C1-006), the Defence Infrastructure Organisation (on behalf of the MoD) confirmed that: <i>The objection to this development must remain in place until the technical and operational assessments on the mitigation proposal [in respect of adverse impacts upon the PSR at Warton Aerodrome] have been completed and concludes that the proposal is viable</i>". Our response to Q4.1.7 above confirms that BAE Systems' operational assessment of the current mitigation solution put forward in respect of the PSR at Warton Aerodrome is ongoing.</p> |
| 6. Ecology, biodiversity and nature conservation (on-shore) | | |
| 6.1 Ecology and nature conservation | | |
| Q6.1.15 | NE, EA and any other interested party | <p>Mitigation Paragraph 1.2.1.8 of 'Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas' [REP2-046] states "In accordance, with CAP 772 guidance (Civil Aviation Authority (CAA), 2017) the wildlife hazard management zones around Blackpool Airport and BAE Warton Aerodrome extend to 13 km" and paragraph 1.2.1.9 states "Given the extent of the wildlife hazard management zones in relation to the Transmission Order Limits, the applicants could not locate environmental mitigation and benefit areas</p> |

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| | | <p>outside of the wildlife hazard zones whilst also meeting their site selection guiding principles (as set out in paragraphs 1.2.1.2 and 1.2.1.3) and ultimately delivering effective mitigation.”</p> <p>Paragraph 1.5.1.3 states “The search area also considered areas in proximity to designated habitats or priority habitats, with the objective of improving habitats that are functionally linked to designated sites and improving connectivity between habitats.”</p> <ul style="list-style-type: none"> a) Do you agree that effective mitigation could not be achieved outside wildlife hazard management zones in relation to the Transmission Order Limits? b) Do you agree that biodiversity benefit area objectives would not be met if it was located outside of the wildlife hazard zones? <p>Regarding (a) and the environmental mitigation areas (“EMAs”) – BAE Systems considers that the Applicants’ site selection methodology should take a balanced approach between ecological mitigation objectives and the need to avoid an increased risk of wildlife hazards to aviation interests, including Warton Aerodrome. This requires more than a cursory reference to “<i>site-specific factors</i>” including proximity to aviation infrastructure. Given the potential implications of increased bird strike risk, it requires detailed assessment, the findings of which should be a key driver in the identification of suitable locations for the EMAs, even if this results in less effective (i.e. less than optimal) ecological mitigation. The proximity of aviation infrastructure is not a matter to which an applicant should turn in the “<i>refinement process</i>” (see paragraph 1.2.1.9 of the ‘Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas’ document). The Applicants’ site selection process ought to have considered the area outside of the wildlife hazard safeguarding / management zones around Warton Aerodrome and Blackpool Airport. However, this area appears to have been automatically and arbitrarily discounted as a consequence of the Applicants giving priority (and a disproportionate weighting) to their site selection guiding principles.</p> <p>Regarding (b) and the biodiversity benefit sites (“BBSs”) – BAE Systems understands that the primary objective of the BBSs is to provide a <u>voluntary</u> biodiversity net gain. Therefore, the need to include them within the Transmission Order Limits in order to deliver “<i>effective mitigation</i>” is not understood. Unlike the EMAs, the purpose of the BBSs is not to provide mitigation for the impacts of the authorised development on ecology / biodiversity – the Applicants have conflated the two. The BBSs are intended to provide net gains for biodiversity and, because demonstration of a biodiversity net gain is not mandated for NSIP applications, there are no statutory requirements in relation to the location of these sites. Therefore, the inclusion of the BBSs within the wildlife management zones around Warton Aerodrome and Blackpool Airport, and the Applicants’ decision to discount the area beyond these zones, requires separate and robust justification. As with the EMAs, the same flaw exists in respect of the Applicants’ approach to</p> |

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| | | identification of the BBSs – consideration should have been given to the area outside of the wildlife hazard safeguarding / management zones to ensure a balanced approach. However, having regard to the Applicants’ explanation of its site selection process, it’s clear that this area has never been “within scope”. |
| 6.2 Biodiversity net gain (BNG) | | |
| Q6.2.3 | The applicants (a-b), NE, EA, FBC, SRBC, PCC, LCC, BBC (c) | <p>Site selection</p> <p>Selection guiding principles are set out in paragraphs 1.2.1.2 and 1.2.1.3 of Site Selection of the Environmental Mitigation and Biodiversity Benefit Areas [REP2-046] submitted at D2.</p> <ul style="list-style-type: none"> a) Explain why the selection guiding principles set out do not include specific safety considerations and policy requirements including potential for increased risk to defence activities? b) Explain if any alternatives for BNG strategy have been considered, including off-site delivery. c) If BNG requirements and the avoidance and/or mitigation of defence aviation risks cannot be met, please explain how excluding BNG areas from the order limits might affect your comments on the application. <p>This question is primarily for the Applicants and others to answer. However, we refer the ExA to our response to Q6.1.15 above.</p> <p>Regarding the BNG areas (i.e. the biodiversity benefit sites – “BBSs”), BAE Systems considers that a cautionary approach should be taken. As the ExA will be aware (and as we’ve already stated), demonstration of a biodiversity net gain is not mandated for NSIP applications. Accordingly, if it cannot be demonstrated that aviation safety and aerodrome / airport operations will not be adversely affected, serious consideration should be given to deleting the BBSs from the project proposals as there is the potential for the impacts on aviation infrastructure (which could include safety concerns, extending to risk to life) to outweigh any benefits arising from provision of the BBSs.</p> |