



For and on behalf of
BAE Systems
Interested Party Reference No.
20053944

BAE SYSTEMS' COMMENTS ON DOCUMENTS SUBMITTED AT DEADLINE 4

Morgan and Morecambe Offshore Wind Farms Transmission Assets DCO Examination

**Prepared by
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1.0 INTRODUCTION

- 1.1 This Statement sets out BAE Systems' comments on submissions made by the Applicants at Deadline 4, including the following documents:
- Outline Code of Construction Practice (Examination Ref: REP4-026)
 - Outline Landscape Management Plan (Examination Ref: REP4-055)
 - Outline Ecological Management Plan (Examination Ref: REP4-085)
- 1.2 BAE Systems' comments on the version of the draft Development Consent Order (dDCO) submitted by the Applicants at Deadline 4 are the subject of a separate submission.
- 1.3 Through ongoing discussions with the Applicants, we are aware that they will be submitting a revised dDCO at Deadline 5 containing amended wording in respect of certain of the Requirements which are of concern to BAE Systems. As such, we will provide further comment on the Deadline 5 version of the dDCO at the Issue Specific Hearings which are scheduled to take place on 7 and 8 October 2025.

2.0 OUTLINE CODE OF CONSTRUCTION PRACTICE

- 2.1 BAE Systems submitted comments on the Deadline 3 version of the Outline Code of Construction Practice (oCoCP) at Deadline 4.
- 2.2 Those comments referred to requirements under CAA Publications 738 (CAP738) and 109611 (CAP109611) for notification to be provided to aerodrome operators of any proposal to use tall construction equipment / plant, such as cranes, with a height of more than 10m above ground level or taller than the surrounding buildings / structures within the 6 km safeguarding zone around the relevant aerodrome (in this case, Warton Aerodrome). It was requested that the oCoCP be updated to make reference to this requirement, together with confirmation that it will be complied with. BAE Systems' have also highlighted the need for the installation of aircraft hazard warning lights on tall construction equipment.
- 2.3 We note that the above-mentioned updates to the oCoCP have not yet been made. Therefore, we repeat our request for the Applicants to action them.
- 2.4 BAE Systems has held recent discussions with the Applicants regarding a draft Wildlife Attractants Habitat Risk Assessment (dWAHRA), which is intended to inform the Bird Strike

Risk Assessment for Warton Aerodrome. It is proposed that the dWAHRA will be appended to the Outline Wildlife Hazard Management Plan (Examination Ref: REP3-065). We understand that the Applicants intend to submit the dWAHRA at Deadline 5.

- 2.5 BAE Systems has provided a number of comments to the Applicants in respect of the dWAHRA, including the need for the dWAHRA to consider potential bird attractant risk associated with construction works and processes generally (such as the stockpiling of soils and waste, particularly food waste) and mitigation measures to address the same (such as covering stockpiles, installing bins with closing lids at construction sites, etc.).
- 2.6 Critically, the measures contained in the dWAHRA (reflected in the Outline Wildlife Hazard Management Plan) and the oCoCP must be aligned – the documents must speak to each other to ensure that one isn't in conflict with or cut across the other.

3.0 OUTLINE LANDSCAPE MANAGEMENT PLAN

- 3.1 The Outline Landscape Management Plan (oLMP) provides preliminary details of the landscape / habitat design and management / maintenance measures for the proposed substation sites and the cable corridor.
- 3.2 There is an overlap with the dWAHRA in that this document is concerned with those design and management / maintenance measures which are aimed at minimising the bird attractant risk in these locations – measures such as soil covering and bird management during seeding. Furthermore, BAE Systems has asked the Applicants to consider additional landscape / habitat management measures at the substation sites, including moss prevention and removal, the details of which should be included in the dWAHRA.
- 3.3 Again, It is important that the oLMP and the dWAHRA are aligned so that the management / maintenance regimes to be adopted at the substation sites and along the cable corridor operate as intended and in an harmonious manner, and that execution of the measures secured by one does not have unintended consequences for the other.
- 3.4 As the dWAHRA is further developed, BAE Systems requests that the necessary updates are made to the oLMP to achieve the requisite consistency between both documents and the measures secured by Outline Wildlife Hazard Management Plan.

4.0 OUTLINE ECOLOGICAL MANAGEMENT PLAN

- 4.1 As with the oLMP, care must be taken to ensure that the landscape related management / maintenance measures contained in the Outline Ecological Management Plan (oEMP), proposed to be adopted in respect of the Ecological Mitigation Areas and the Biodiversity Benefit Sites, should not conflict with or compromise the delivery of measures intended to manage the potential bird attractant risk (the details of which are contained in the dWAHRA).
- 4.2 As the dWAHRA is further developed, BAE Systems requests that the necessary updates are made to the oEMP to achieve the requisite consistency between both documents and the measures secured by Outline Wildlife Hazard Management Plan.

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