



Defence Infrastructure Organisation

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David Cliff
The Planning Inspectorate
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6 November 2025

Dear David

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

This letter updates the Ministry of Defence (MOD) Safeguarding position with regard to the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets. A letter, dated 20 May 2025, setting out the MOD position was provided to the Examining Authority, which was subsequently updated by letters dated 22 September 2025 (in response to the Examining Authority's ExQ2 & commentary and questions on the draft development consent order) and 22 October 2025 (in response to Action Points arising from issue specific hearing 4). A Statement of Common Ground (SoCG) has been prepared in conjunction with both the Applicants and BAE Systems Warton; that SoCG was signed 31 October 2025.

This letter addresses outstanding issues only which relate to the proposed development as situated within the boundaries of the statutory birdstrike safeguarding zone for Warton Aerodrome and the impact of the proposed environmental mitigation works and biodiversity benefit sites and will focus on the MOD maintained objection on the grounds that the development in its currently proposed form specifically the environmental mitigation area proposals at Newton-with-Scales has the potential to degrade aviation safety by creating or enhancing environments that would attract or support populations of large or flocking bird species. This is particularly relevant to the Applicants' proposed wording of Requirement 27 within Schedule 2A and Schedule 2B of the draft Development Consent Order.

Birdstrike

MOD acknowledge that the Applicants, BAE Systems, and MOD have made efforts to work collaboratively to identify realistic and pragmatic solutions. There are a number of Works within the proposed Onshore Transmission Assets which have the capacity to impact on the operation and capability of Warton Aerodrome. In responding to consultation, MOD has sought to identify those elements and worked with the Applicants and BAE Systems to find means to address/mitigate those

potential impacts. MOD note that the Applicants have submitted documents intended to ensure that the development does not result in the creation or enhancement of environments that might attract hazardous bird species within the statutory safeguarding zone drawn to preserve aviation safety at Warton Aerodrome.

MOD has reviewed the most recently submitted Outline Wildlife Hazard Management Plan (Doc. Ref. S_D3_8/F03 dated 22 October 2025), specifically the measures and activities detailed in Appendix A 'Wildlife Attractants Habitat Risk', and this assessment has concluded that the MOD objection on the grounds of the potential for increased risk of birdstrike must be maintained.

Work Numbers 49A (Morgan permanent environmental mitigation works including permanent access) and 49B (Morecambe permanent environmental mitigation works including permanent access) relate to proposed works covering a variety of sites. These works at Newton-with-Scales involve the enhancement and restoration of existing habitat features to provide replacement habitat for non-breeding and breeding terrestrial waterbirds and farmland birds displaced by the permanent loss of habitat at the sites where the onshore substations will be located. Amongst the environmental measures and activities to be undertaken at Newton-with-Scales the Applicants propose the creation of permanent scrapes, management water levels within existing ditches, stopping up hedgerows and the creation of a mosaic of grassland.

The site at Newton-with-Scales is located slightly north of Warton Aerodrome, to the south of the site is the Ribble Estuary. Given the location of the site and the Applicants' proposed enhancement of the habitat for Golden Plover, Teal, Black-tailed Godwit, other terrestrial waders such as Lapwing and Curlew, and waterfowl such as Wigeon (though the environmental mitigation proposals would also benefit breeding farmland birds such as Corn Bunting, Grey Partridge and Tree Sparrow) there is particular concern that movements of flocking hazardous birds, such as waders and waterfowl, to and from the Ribble Estuary to the south will take them through, **and across**, operational airspace which includes both the approach and take-off/climb airspace associated with runway 25 / 07. The introduction of these bird species which are hazardous to the safety of aircraft has the capacity to increase the potential for birdstrike to the detriment of aviation safety.

MOD has provided feedback to the Applicants advising that the environmental mitigation proposals, for the implementation of habitat enhancement measures to mitigate potential impacts of temporary and permanent habitat loss associated with each of the onshore substations, are not appropriate at the Newton-with-Scales location. The species targeted by these proposals include Golden Plover, Teal, Black-tailed Godwit, other terrestrial waders such as Lapwing and Curlew, waterfowl such as Wigeon, and breeding farmland birds such as Corn Bunting, Grey Partridge and Tree Sparrow. The primary objective of the mitigation area is to provide permanent alternative habitat for non-breeding Golden Plover due to the permanent habitat loss at the onshore substation sites. Golden Plover form very dense flocks, and movements of these flocks around the area to the east of Warton Aerodrome will have a significant impact on birdstrike risk with this species (flocking species result in a higher probability of damage to the aircraft if struck due to the increased chance of multiple strikes in the same incident).

During discussions MOD has advised that use of the Newton-with-Scales site for the species identified is problematic. If it is necessary to provide habitat for these species it would be more expedient and/or judicious to provide it on a site south of Warton Aerodrome, ideally to the south of the estuary. If mitigation must be undertaken at the Newton-with-Scales site it should target less potentially hazardous species such as Corn Bunting and Grey Partridge and be designed to deter larger more hazardous species especially wintering waders and waterfowl.

The MOD is advised that any effective management plan to mitigate the potential birdstrike risk associated with the proposed environmental enhancements would be, by design, required to target those species for which the Applicants seek to provide a replacement habitat. For a management plan to be effective in mitigating the potential increase in birdstrike risk it would need to ensure that no

hazardous birds are utilising the Newton-with-Scales site above the levels that are currently present there.

Schedule 2A Requirement 27 and Schedule 2B Requirement 27

MOD acknowledge that the Applicants have made provision within their draft Development Consent Order (Document ref. C1/F09, Revision. F09, dated 22 October 2025) for a mechanism through which a detailed Wildlife Hazard Management Plan may be submitted for approval and, subject to receiving that approval, works may begin subject to implementation of those measures/actions set out in the approved Wildlife Hazard Management Plan. That requirement is set out at Schedule 2A, Requirement 27 and Schedule 2B, Requirement 27. The wording of each of those requirements makes specific reference to an Outline Wildlife Hazard Management Plan, and as the detailed WHMP is required to be in accordance with the Outline Wildlife Hazard Management Plan the contents of which, as previously detailed, have not been agreed or deemed acceptable it is not possible for MOD to agree the wording of either Requirement.

I trust this adequately explains the updated MOD position in regard of this proposed development.

Please do not hesitate to contact me should you require any additional information, or should you wish to discuss matters.

Yours sincerely

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Assistant Safeguarding Manager
DIO Safeguarding