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Department of Energy Security and Net Zero  
3-8 Whitehall Place  
London  
SW1A 2AW

22<sup>nd</sup> June 2026

Interested Party: BAE Systems (Operations) Limited

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Dear Sir/Madam,

**Subject: Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010 Application by Morgan Offshore Wind Limited and Morecambe Offshore Windfarm Limited (“the Applicants”) for an Order granting Development Consent for the proposed Morgan and Morecambe Offshore Wind Farms Transmission Assets (“the Proposed Development”)**

**Please find below BAE Systems responses to Actions 20, 21 and 22, as requested by the Department of Energy Security and Net Zero under the cover of EN020032, issued on 20<sup>th</sup> May 2026.**

Action 20

**20. BAE Systems (“BAE”) is requested to update its bird strike risk assessment provided within [C1-023] to include further explanation of the approach and methodology used in the assessment of risk and commentary on the findings of this risk levels. This should include: the approach to allocating the “*Re assessed risk level*” risk scores to account for the proposed development; an explanation of why risk levels for species groups such as waders and geese is considered to increase between the “*Re assessed risk level*” and the “*Risk level with management*”; how proposed control measures in the outline Wildlife Hazard Management Plan [REP7-034] have been considered within the allocation of the “*Risk level with management*” score; discussion and conclusions on the assessed risk levels and their implications for aviation safety.**

*BAE Systems does not have appropriate time to update the bird strike risk assessment noted at C1-023, within the timescales allowed. BAE Systems tasked an independent SME to provide a qualitative assessment based on their local knowledge of Warton Aerodrome and the applicants*

proposal. The risk level is based on engagement with local bird sanctuaries including Martin Mere and Lytham District Wildfowlers Association (LDWA) and other local land owners. This risk assessment could be better informed in the future post-consent through use of BAE Systems bird radar technology which would enable quantitative data to support the qualitative assessment. BAE Systems retain concerns around the impact of larger birds such as Pink Footed Geese and Gulls as a result of changes to migratory bird patterns.

Whilst BAE maintains concerns regarding the mitigation areas, particularly in relation to land south of Newton-with-Scales, BAE recognise that there will be updates to the Outline Wildlife Hazard Management Plan and the Outline Ecological Management Plan. BAE acknowledges that the measures set out within the Outline Wildlife Hazard Management Plan, and secured through the corresponding Requirement within the DCO, ensure that the Applicants cannot implement the mitigation measures without BAE's agreement. On this basis, BAE recommends that early and ongoing engagement with the Applicants is undertaken should the Secretary of State grant consent for the project.

Air Safety and protection of employees, infrastructure and the local population remain BAE Systems priority and BAE Systems will not accept a reduction in Air Safety.

#### Action 21

**21. The Secretary of State notes that throughout BAE's bird strike risk assessment , [C1-023] in relation to monitoring , the risk assessment refers to data sharing and reporting agreements with Blackpool Airport but states "no suggestions made for BAE Warton ". BAE is requested to provide a list of the information/reporting it 5 would expect from the Applicants to enable safe management of bird strike risk.**

**The Applicants are invited to propose data sharing and reporting arrangements with BAE to support the management of this information and related bird strike risk.**

The following is an agreed joint response between BAE and the Applicants.

The Applicants and BAE held a constructive meeting on 16 June 2026, during which it was agreed that data sharing and reporting arrangements will be set out within the Communication Protocol to be included in the detailed Wildlife Hazard Management Plan, to be secured through DCO Requirement 27 and developed post-consent in accordance with the oWHMP (S\_D3\_8/F06).

Importantly, the Applicants will align reporting with BAE's existing protocols and established communication channels. It is proposed that bird monitoring data (e.g. flight activity and abundance of target species) will be recorded and reported at regular intervals, to be agreed with BAE (and DIO). In contrast, surveillance data and other information required to inform decisions on the deployment of Active Management Measures (AMM) will necessitate a more dynamic, real-time system for recording on-the-ground observations, which will also be agreed through the finalisation of the detailed Wildlife Hazard Management Plan. BAE Systems (Warton Aerodrome) has active technologies which enable the monitoring of bird movements via radar. This could be considered as part of any solution, post consent.

The specific arrangements will be agreed with BAE through the development of the Communication Protocol as part of the approval of the Wildlife Hazard Management Plan. While

*it was always the Applicants' intention for these matters to be addressed within the Plan, in the oWHMP has now been explicitly updated to ensure that this level of detail is included (with BAE acknowledging these updates to the oWHMP). Table 1.5 and Section 1.5 have been revised accordingly (S\_D3\_8/F06).*

*These measures will ensure that information is shared effectively and that bird strike risk at Warton will continue to be managed safely.*

## Action 22

**22. BAE is invited to explain why it has not been able to provide the complete data sets expected by the Applicants to inform the assessment of bird strike risk.**

The following is an agreed joint response between BAE and the Applicants.

BAE Systems could not share data earlier in the examination process due to a lack of an NDA between the two parties. This NDA is now in place to support future data sharing.

As noted in response to Question 21, the Applicants and BAE met to discuss bird strike data and associated requirements. It was agreed that relevant data will be shared with the Applicants post consent to support the finalisation of the Wildlife Hazard Management Plan (in accordance with the oWHMP (S\_D3\_8/F06)).

The sensitivity of certain data was also discussed, and parties further agreed to work closely to ensure that monitoring and data collection align with BAE's requirements and are handled appropriately.

The data to be shared post consent is likely to include information such as:

- **Management of bird strike:** to understand how monitoring, dispersal, and control of birds is currently undertaken by BAE.
- **Risk matrix or bird strike risk assessment in current use:** to ensure the Applicants' assessment considers the latest risk information and can be integrated with BAE's own approach as far as possible.
- **Method Statement for Wildlife Management:** to better understand how BAE monitors and controls wildlife in proximity to the Aerodrome.
- **13 km Aerodrome Wildlife Survey:** to better understand how BAE monitors bird activity across the wider area, including identifying fluctuations and areas of high usage.
- **Wildlife Hazard Management Plan:** to identify key risk areas and understand existing passive and active measures, including reporting and communication protocols, to inform the Applicants' approach.
- **Strike Rate Probability Index:** used to track bird strike occurrences and assess risk at Warton Aerodrome.

BAE Systems remain supportive to any arising queries which may come out of the process, prior to the decision in September 2026.

Kind Regards,



Programme Manager  
BAE Systems