

Morecambe Generation Assets DCO – ExQ1 – Blackpool Airport Responses

ExQ1	Question to:	Question	Response
1CAR8.	The Applicant BAE Systems (Operations) Ltd BAE Systems Marine Ltd Blackpool Airport DIO NATS	<p>Mitigation Paragraph 16.161 of ES Chapter 16 [REP1-036] sets out that CAP764 Policy and Guidelines on Wind Turbines (published by CAA) Outlines other mitigation options that could be used either singly or in combination.</p> <p><u>To the Applicant:</u> a) Could the Applicant please set out what mitigation options it considers would be most suitable to ensure that the adverse effects of the Proposed Development caused by permanent interference with civil and military PSRs are fully mitigated?</p> <p><u>Other parties:</u> b) Do relevant IPs have any views on whether the identified adverse effects can be fully mitigated?</p>	<p>b) Subject to the outcome of ongoing assessments, the mitigation measures in CAP764 appear to be appropriate and effective in allowing the Applicant and IPs an opportunity to secure appropriate mitigations (at the Applicant’s expense). However the Airport notes that the CAA published a consultation on a revised CAP764 in 2024 and an update is currently awaited.</p> <p>Blackpool Airport anticipates that mitigations for the identified adverse effects could be agreed and accomplished with sufficient time and resource, again subject to review of the outcome of ongoing assessments / reviews (including the Five-Year Review and an independent safeguarding assessment to be undertaken by NATS), which could reveal as yet unidentified impacts. In addition to the identified potential impacts on IFPs and VHF communication systems, the Airport notes at this stage that the scheme has been confirmed to have impacts on its MSAs (minimum sector altitudes) and may additionally have impacts on DF (direction finding) communication systems, for which mitigation would also be required.</p>
1CAR13.	The Applicant Blackpool Airport	<p>Instrument Flight Procedures (IFPs) IFPs for Warton, Walney, Lowther and Blackpool Airport would require revision. In the Applicant’s</p>	<p>d) Subject to the outcome of ongoing assessments, and to reaching acceptable commercial agreement(s) with the Applicant to cover costs</p>

	<p>BAE Systems (Operations) Ltd BAE Systems Marine Ltd DIO NATS</p>	<p>response to Blackpool Airport's Relevant Representation ([PD1-011], RR-013-02) it is stated IFP mitigation is predicated on revisions to Blackpool Airports IFPs following the CAA five-year audit review. This review is stated to be ongoing and due for completion by November 2024. If necessary, the IFP assessment may need to be reassessed.</p> <p><u>To the Applicant:</u></p> <p>a) Can the Applicant clarify and explain whether the CAA five year audit applies to all airports/ aerodromes or just Blackpool Airport?</p> <p>b) Can the Applicant please advise if this audit has been completed, summarise its findings (if known) and advise whether an update to the IFP assessment submitted as part of the application is required? If an update is required, please can the Applicant set out a likely timeframe for submission of such an assessment?</p> <p>c) Can the Applicant explain who would be responsible for making the changes to IFPs and the likely timeframe for completion? Would the timeframes differ for each airport or would these be the same?</p> <p><u>All Parties:</u></p> <p>d) Is there any reason or identifiable impediment why the required changes to the IFPs would not be agreed/achieved?</p> <p>e) Having regard to Schedule 2, Requirements 5, 6 and 7 of the latest version of the dDCO [REP2-</p>	<p>associated with the mitigations, the Airport does not presently consider there to be any reason or identifiable impediment why the required changes to IFPs would not be agreed / achieved. The Airport would note that it understands that the Five-Year Review in respect of Runway 10 will not be submitted to the CAA until the end of February.</p> <p>e) The Airport's proposed amendments to Requirement 5 (Blackpool Airport IFPs) are attached to this submission on a without prejudice basis at Appendix 1 – however, the Airport's position is that the potential impacts of the scheme are, or may not be, limited to IFP matters, and as such a broader requirement, which provides for appropriate mitigation to be secured in respect of identified impacts on the Airport's operational and air traffic services, is more appropriate and is preferred. The Airport's proposed wording for such a requirement is provided at Appendix 2.</p>
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1CAR18.	The Applicant BAE Systems (Operations) Limited BAE Systems Marine Ltd Blackpool Airport Ronaldsway Airport	<p>Very High Frequency (VHF) and Direction Finding (DF) Communications</p> <p>In the draft SoCG submitted at Deadline 1 (BA 14, [REP1-070]) it is noted that Blackpool Airport has identified impacts to VHF radio and DF communications and stated that an assessment is required and needs to take into account other adjacent offshore wind farm projects. No such assessment is currently contained within the application documents, having previously been agreed to be scoped out.</p> <p><u>To Blackpool Airport/ BAE Systems:</u></p> <p>a) Please can Blackpool Airport/ BAE Systems explain why the concerns about potential impacts to VHF and DF communications were not identified earlier or whether something has changed since the Application was submitted which gives rise to these concerns?</p> <p><u>To BAE Systems (Operations) Limited, BAE Systems Marine Ltd and Ronaldsway Airport</u></p> <p>b) Do any of the operators of other aerodromes/ airports have any comments or concerns in relation to impacts on VHF and DF communications? If so please can summarise these concerns.</p> <p><u>To the Applicant:</u></p>	<p>a) Blackpool Airport was not (to the best of its recollection) involved in the Applicant's ES scoping discussions as part of pre-application consultation and was not therefore in a position to make the Applicant aware of potential VHF impacts prior to the DCO's submission for examination.</p> <p>However, Blackpool Airport first became aware of the potential for these effects following concerns and issues raised by another Air Navigation Service Provider (ANSP) unit during hearings for another offshore windfarm NSIP currently undergoing examination (Morgan Offshore Windfarm Generation Assets). As a result of this, the CAA alerted the Airport to the risk of such impacts on its own systems in the context of the present examination.</p>

		<p>c) Discussions have commenced with Blackpool Airport about its concerns on VHF and DF communications and that an update will be given at a future deadline. Please can the Applicant provide an update by no later than Deadline 3 which includes:</p> <ul style="list-style-type: none">i) confirmation of whether an assessment is to be carried out and whether this is only required for Blackpool Airport or will include other aerodromes/ airports in the study area (and if so which ones);ii) if an assessment is to be undertaken, the timeframe for carrying out such an assessment and when it will be submitted into the Examination (albeit this must be received no later than D4 in order that parties have an opportunity to comment upon it).iii) if it is considered an assessment is not required, an explanation and justification to support the position and how the concerns raised by IPs will be addressed.	
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Appendix 1: Proposed amendments to draft DCO Requirement 5

Blackpool Airport Instrument Flight Procedures

5.—(1) No construction of any wind turbine generator (excluding foundations) as part of the authorised development shall take place until the Secretary of State, having consulted with the airport operator, confirms satisfaction in writing that—

- (a) an IFP scheme has been ~~submitted to the airport operator~~ agreed with the airport operator;
- (b) the Civil Aviation Authority has evidenced its approval to the airport operator of the IFP scheme ~~(if such approval is required)~~;
- (c) the IFP scheme is accepted by NATS Aeronautical Information Service (AIS) for implementation through the Aeronautical Information Regulation and Control (AIRAC) cycle (or any successor publication), where applicable, and is available for use by aircraft; and
- (d) a mitigation agreement has been ~~submitted to the airport operator to enter~~ ed into.

(2) For the purposes of this requirement—

- (a) “airport operator” means Blackpool Airport Operations Limited or any successor as holder of a licence under the Commission Regulation (EU) No. 139/2014 (or any successor regulation) from the Civil Aviation Authority to operate Blackpool Airport;
- (b) “IFP scheme” means a scheme that will provide appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development may have address the potential impact of the turbines on the instrument flight procedures of the airport operator and Blackpool Airport; and
- ~~(c)~~ “mitigation agreement” means an agreement between the airport operator and the undertaker which ensures that the IFP scheme will be implemented and maintained throughout the lifetime of the authorised development—
 - ~~(i)~~ obliges the parties to agree an IFP scheme; and
 - ~~(ii)~~ (c) obliges the undertaker to comply with the IFP scheme and the remaining terms of this requirement.

Appendix 2: Proposed broader requirement wording

Operation of Blackpool Airport

- [x].—(1) No part of any wind turbine generator (excluding foundations) shall be erected as part of the authorised development until the Secretary of State, having consulted with the Operator and the CAA, has confirmed in writing that s/he is satisfied that:
- (i) Appropriate Mitigation will be implemented and maintained throughout the lifetime of the authorised development; and
 - (ii) appropriate arrangements have been put in place with the Operator to ensure that such Appropriate Mitigation is so implemented and maintained.
- (2) For the purposes of this requirement—
- “Appropriate Mitigation”** means appropriate mitigation measures to prevent or remove any adverse impacts which the authorised development will have on the ability of the Operator to provide safe airport operational and air traffic services (including but not limited to any adverse impacts on instrument flight procedures, minimum sector altitudes, and very high frequency radio and direction finding communication systems) for Blackpool Airport;
- “Approved Mitigation”** means the Appropriate Mitigation agreed with the CAA and the Operator and approved by the Secretary of State in accordance with sub-paragraph (1);
- “CAA”** means the Civil Aviation Authority constituted by the Civil Aviation Act 1982; and
- “Operator”** means Blackpool Airport Operations Limited (incorporated in England and Wales with company number 09307995 and whose registered office is Number One Bickerstaffe Square, Talbot Road, Blackpool FY1 3AH), or any successor as holder of a licence under the Commission Regulation (EU) No. 139/2014 (or any successor regulation) from the CAA to operate Blackpool Airport.
- (3) The undertaker shall thereafter comply with all obligations contained within the Approved Mitigation throughout the lifetime of the authorised development.