



Defence
Infrastructure
Organisation

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Application Reference: EN010079

Our Reference: DIO 10040016

National Infrastructure Planning
The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol
BS1 6PN

22nd July 2022

Dear Sir/Madam,

The Norfolk Vanguard Offshore Wind Farm Order 2022 Application for a Non-material Change

Infrastructure Planning (Changes to, and Revocation of, Development Consent Orders) Regulations 2011 (as amended) (2011 Regulations)

I write to confirm the safeguarding position of the Ministry of Defence (MOD) in relation to the above application to make a non-material change to the Development Consent Order (DCO) granted in 2022.

The application seeks to make changes to the parameters relating to the wind turbine generators that will feature in the development. The changes sought are to:

- Remove the limit on the maximum export capacity of the wind farm;
- reduce the maximum, total number of wind turbines that can be built in this development from 158 to 145;

The MOD has assessed the impacts of the changes proposed.

The changes sought will not physically impact upon MOD offshore Danger and Exercise Areas or adversely affect defence maritime navigational interests.

The turbines and some of the tall ancillary offshore structures will affect military low flying training activities that may be conducted in this area. The need for this development to be fitted with

aviation warning lighting was identified in relation to the original application and the amended DCO includes a relevant Requirement,12 – Aviation Safety.

Wind turbines have been shown to have detrimental effects on the operation of air defence radar. These include the desensitisation of the radar in the vicinity of wind turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the locality of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and manage aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

In relation to the operation of defence radars, it has been determined that the proposed wind farm will be in line of sight and detectable to the air defence radar currently located at Remote Radar Head (RRH) Trimingham ("air defence radar").

Our assessments have determined that the proposed wind farm will cause unacceptable and unmanageable interference to the effective operation of this air defence radar.

The impact of the development upon the operation of the air defence radar and the need for this to be mitigated has been recognised by the applicant.

Requirement 13 (Ministry of Defence surveillance operations) as included in the DCO granted for this development, defines a requirement for the provision of a mitigation to address the impacts the development will have on the air defence radar at RRH Trimingham.

The MOD is relocating the air defence radar currently located at RRH Trimingham to MOD land at RAF Neatishead, Norfolk which will establish RRH Neatishead. This is scheduled to be completed before the consented Norfolk Boreas offshore wind farm becomes operational.

When the air defence radar is relocated and operated from RRH Neatishead the consented Norfolk Boreas offshore wind farm will continue to be will be in line of sight and detectable to this air defence radar causing unacceptable and unmanageable interference.

Therefore, there remains a requirement for this air defence radar to be mitigated to address the impacts that this development will cause.

In view of the forthcoming relocation of the air defence radar, the MOD considers it appropriate that the wording of Requirement 13 is revised to replace the reference to RRH Trimingham with RRH Neatishead. The amended version of this Requirement proposed is included at Annex A below.

It should also be noted that since the DCO was granted the Defence Infrastructure Organisation Head Office has been relocated. As such all references to the "Defence Infrastructure Organisation Safeguarding" included in the DCO should be amended to replace the postal address currently included with that detailed below:

St George's House
DIO Head Office
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

I have amended the address for the Defence Infrastructure Organisation included in the text of Requirement 13 at Annex A accordingly.

I can therefore confirm that, the MOD maintains no safeguarding objection to this non-material amendment application subject to the retention of Requirements 12 and 13 in any amended DCO that may be issued for this development and that the wording of Requirement 13 is amended as set out in Annex A below.

I trust this clarifies our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further.

Yours faithfully,

A solid black rectangular box used to redact the signature of Jon Wilson.

Jon Wilson
Senior Safeguarding Manager

Annex A

Aviation safety

12.—(1) The undertaker must exhibit such lights, with such shape, colour and character and at such times as are required in writing by Air Navigation Order 2016(a) and/or determined necessary for aviation safety in consultation with the Defence Infrastructure Organisation Safeguarding and as directed by the CAA. Lighting installed specifically to meet Ministry of Defence aviation safety requirements must remain operational for the life of the authorised development unless otherwise agreed in writing with the Ministry of Defence.

(2) The undertaker must notify the Defence Infrastructure Organisation Safeguarding, at least 14 days prior to the commencement of the offshore works, in writing of the following information—

- a) the date of the commencement of construction of the offshore works;
- b) the date any wind turbine generators are brought into use;
- c) the maximum height of any construction equipment to be used;
- d) the maximum heights of any wind turbine generator, meteorological mast, offshore electrical platform and offshore service platform to be constructed; and
- e) the latitude and longitude of each wind turbine generator, meteorological mast, offshore electrical platform and offshore service platform to be constructed,

and the Defence Infrastructure Organisation Safeguarding must be notified of any changes to the information supplied under this paragraph and of the completion of the construction of the offshore works.

Ministry of Defence surveillance operations

13.—(1) No wind turbine generator forming part of the authorised development is permitted to rotate its rotor blades on its horizontal axis until the Secretary of State having consulted with the Ministry of Defence confirms satisfaction in writing that appropriate mitigation will be implemented and maintained for the life of the authorised development and that arrangements have been put in place with the Ministry of Defence to ensure that the approved mitigation is implemented.

(2) For the purposes of this requirement—

- (a) “appropriate mitigation” means measures to prevent or remove any adverse effects which the authorised development will have on the air defence radar at Remote Radar Head (RRH) Neatishead and the Ministry of Defence’s air surveillance and control operations;
- (b) “approved mitigation” means the detailed Radar Mitigation Scheme (RMS) that will set out the appropriate measures and timescales for implementation as agreed with the Ministry of Defence at the time the Secretary of State confirms satisfaction in writing in accordance with paragraph (1); and
- (c) “Ministry of Defence” means the Ministry of Defence as represented by Defence Infrastructure Organisation – Safeguarding, St George’s House, DIO Head Office, DMS Whittington, Lichfield, Staffordshire WS14 9PY or any successor body.

(3) The undertaker must thereafter comply with all other obligations contained within the approved mitigation for the life of the authorised development.

