

From: [REDACTED]
To: SADEP
Cc: [REDACTED]
Subject: RE: 20221114_MOD_Interim_Response
Date: 15 November 2022 11:31:30
Attachments: [image002.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Thank you for your email.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The purpose of my email yesterday was to highlight that the DIO Safeguarding Team wishes to be involved in this Nationally Significant Infrastructure application process. As the applicant has made clear in their submitted Environmental Statement (Chapter 15 Aviation and Radar, Volume 1 - Document Ref. 6.1.15, and Volume 2 – Document Ref. 6.2.15) the extension of existing wind farms at Sheringham Shoal and Dudgeon has the capacity to have an impact on Defence operations and capability. DIO Safeguarding participate in the application process to ensure that necessary assessments and, if necessary mitigations, can be secured to ensure that any detrimental impacts on Defence operations and capability are appropriately addressed. I acknowledge that the applicant's draft Development Consent Order contains, at requirements 10 and 27, potential wording to provide means to address MOD concerns.

Whilst a more formal representation would normally have been made at this time, data required to carry out assessments of the proposed development was received late last week (10 November), these assessments are currently under way and I would hope to be able to provide a more detailed response later this week. Through my email yesterday I provided copies of correspondence sent to the applicant which identify the key issues/concerns MOD has previously identified.

I would be grateful if you could provide confirmation that DIO Safeguarding will be consulted throughout the NSIP process.

Please do not hesitate in contacting me directly if you wish to discuss further.

Kindest regards

Teena Oulaghan

Safeguarding Manager
Estates – Safeguarding

St George's House | Defence Infrastructure Organisation Head Office |
DMS Whittington | Lichfield | Staffordshire | WS14 9PY
Mobile Tel: 07970170934

Website: www.gov.uk/dio/ | **Twitter:** @mod_dio

Read DIO's blog: <https://insidedio.blog.gov.uk/>



Defence Infrastructure Organisation

Due to covid-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on

[REDACTED]

From: SADEP <sadep@planninginspectorate.gov.uk>

Sent: 14 November 2022 17:09

To: Oulaghan, Teena C2 (DIO Estates-SafegdMgr1) [REDACTED]; SADEP <sadep@planninginspectorate.gov.uk>

Subject: RE: 20221114_MOD_Interim_Response

Application by Equinor for an Order Granting Development Consent for the Sheringham and Dudgeon Extension Projects

Dear Ms Oulaghan

Thank you for your email and attachments.

Please note however that your correspondence cannot be regarded as a valid Relevant Representation and therefore you have **not** been registered as an Interested Party. To be valid, the representation should be submitted on a fully completed Planning Inspectorate Registration and Relevant Representation form and must be received by the Planning Inspectorate by the Deadline of 23:59 hours on 14 November 2022.

You can register to become an Interested Party by completing the [Registration and Relevant Representation form](#) that is available on the [project webpage of the National Infrastructure Planning website](#). If you can please complete the form and in the 'Your representation' field say that the representation has been sent by email then we will be able to attach your letter (attached above) to your Relevant Representation form.

Further information about registering as an Interested Party can be found in the Planning Inspectorate's 'Advice Note 8.2: How to register to participate in an Examination' which can be found here:

<https://infrastructure.planninginspectorate.gov.uk/legislation-andadvice/advice-notes/>

I hope this information is helpful.

Kind Regards

Harpriya



The Planning
Inspectorate

Harpriya Kaur | Case Officer - National Infrastructure
The Planning Inspectorate
Helpline: 0303 444 5000
Email: sadep@planninginspectorate.gov.uk



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From: Oulaghan, Teena C2 (DIO Estates-SafegdMgr1) [REDACTED]

Sent: 14 November 2022 16:52

To: SADEP <sadep@planninginspectorate.gov.uk>

Subject: 20221114_MOD_Interim_Response

Good Afternoon

Thank you for consulting the MOD, I can confirm that MOD would like to be listed as an interested party in the planning process for this development.

I appreciate that the deadline for comment on this development is today, however, the MOD did not receive location information until 10/11/2022 and therefore our assessment is still ongoing. I have attached our responses to PEIR consultations setting out our position and will submit an updated response once our assessment is completed.

Please do not hesitate to contact me further if required.

Kindest regards

Teena Oulaghan

Safeguarding Manager
Estates – Safeguarding

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DPC:76616c646f72





Ministry
of Defence

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore

Karl Hege Mork
Equinor New Energy Limited
Freeport Dudgeon and Sheringham Ext.

Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

Your Reference: PEIR
Our reference: 10046594 & 10046595

09 June 2021

Dear Karl,

Sheringham Shoal Extension Project and Dudgeon Extension Project.

Section 42 of the Planning Act 2008 (“the 2008 Act”) and Regulations 11 and 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“the 2017 Regulations”)

I write to confirm the safeguarding position of the Ministry of Defence (MOD) in relation to the request made by the applicant for comment on Preliminary Environmental Information Report (PEIR).

The applicant has prepared a PEIR. This recognises the principal defence issues that will be of relevance to the progression of the proposed development.

In November 2019, the MOD provided a scoping opinion on the proposed extension projects. The opinion identified defence related issues and constraints which should be provided in the Environmental Statement. We are pleased to see that our comments and recommendations have been included within the PEIR report.

The use of airspace for defence purposes in the vicinity of the proposed development have been appropriately identified and considered. The PEIR considers aviation and radar systems that may be affected by the proposed wind farm extension areas. Chapter 17 of the report relates to aviation and MOD issues and chapter 17.6 specifically recognises the impact of both extension areas on Air Defence Radar (ADR). The applicant’s Radar Line of Site (RLOS) assessment is summarised in chapter 17.6.2.2.1 (Table 17-11) of the PEIR. The assessment concludes that both Sheringham Shoal and Dudgeon wind farms would fall within RLOS of radars located at Remote Radar Head (RRH) Trimingham and RAF Coningsby.

The applicant has recognised the potential need for mitigation to address the impacts on air defence systems and states they will engage with the MOD on this. The ADR at RRH Trimingham has been identified as a relevant receptor. Both extension areas will be detectable to the ADR at RRH Trimingham and will impact upon the operation of the air defence system.

Mitigation to address the impacts on the AD Radar at RRH Trimmingham will be required. It will be necessary for the applicant to provide an appropriate technical mitigation for this site.

The applicant has identified in chapter 17.6.2.2.1 the impact of the turbines on the Primary Surveillance Radar (PSR) at RAF Coningsby. Turbines on the western edge of the Dudgeon extension area and the whole array of Sheringham Shoal will be detectable to the PSR at RAF Coningsby. However, our operational assessment indicates that although Radar Line of Sight (RLOS) there will be no impact on military operations. We therefore have no concerns that the development will have no impact on this radar and does not require mitigation.

Chapter 17.1 of the PEIR makes reference to the lighting of the Dudgeon Offshore Wind Farm and the MOD's Lighting Guidance is listed as a data source. In the interests of air safety, the Dudgeon and Sheringham Shoal extension areas should be fitted with MOD accredited aviation safety lighting in accordance with the Air Navigation Order 2016. The MOD would need to confirm the specification of the lighting to be used.

The proposed extension areas do not overlap with any military danger areas or Practice and Exercise Areas (PEXA). We therefore do not anticipate there to be any concerns relating to military maritime activities.

The potential for the offshore development area to contain historic disposal sites has been identified. In addition, the potential presence of unexploded ordnance (UXO) has also been identified as a relevant consideration. The potential presence of UXO and disposal sites is also a relevant consideration to the installation of cables and other intrusive works that may be undertaken in the maritime environment.

In relation to the onshore element of the proposed development, Chapter 5.6 of PEIR states that the landfall at location, where sea cables will come ashore, is Weybourne. The cable route corridor at the Weybourne landfall site occupies the eastern extent of the statutory technical safeguarding zone surrounding the RAF Weybourne transmitter site; in particular the any development height zone. Any structures whether permanent or temporary i.e. construction equipment at this location may cause a physical obstruction to the radar. Any development within these zones will need to be compatible with technical safeguarding requirements.

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 sincerely

Teena Oulaghan
Safeguarding Manager



Ministry
of Defence

Defence Infrastructure Organisation

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Karl Hege Mork
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Teena Oulaghan
Safeguarding Manager