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Ms Menaka Sahai
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By email only

Dear Ms Sahai

National Infrastructure Planning: Sheringham and Dudgeon Extension Projects

I write to confirm the safeguarding position of the Ministry of Defence (MOD) in relation to the draft Development Consent Order submitted by the applicant in support of this National Infrastructure Planning application.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the 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. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning and energy consenting systems both as a statutory and non-statutory consultee.

The development proposed consists of extensions to the existing Sheringham Shoal and Dudgeon wind farms, adding a total of up to 53 wind turbine generators (up to 23 to Sheringham Shoal Wind Farm and up to 30 to Dudgeon Wind Farm) as well as the associated infrastructure, export cables, landfall, and onshore export cables.

The Sheringham and Dudgeon Extension Projects have elements that fall within or are washed over by safeguarding zones drawn to assure the operation and capability of various MOD sites and assets. Particularly relevant in this case is the potential for the additional wind turbines to have an impact on the operation of air defence radar systems and for the landfall and associated works to impact on the operation of a technical asset sited at RAF Weybourne.

At this time the MOD must object to the proposed development on the basis that the scheme would have a significant and detrimental impact on the effective operation and capability of air defence radars deployed at Remote Radar Head (RRH) Trimmingham and RRH Neatishead.

Offshore development and impact on air defence radar(s)

As the applicant acknowledges in their Environmental Statement (Chapter 15 Aviation and Radar Document Reference: 6.2.15, APFP Regulation: 5(2)(a)) at section 15.6.2.2, the development would have an impact on the effective operation of air defence radar sited at RRH Trimmingham. It should be noted that an additional radar site is now in operation and the impact on the development proposed on the air defence radar operated at RRH Neatishead is also a consideration.

An operational assessment has been completed which has considered the proposed Sheringham and Dudgeon Extension Projects. The application site is situated approximately 18.7km from RRH Trimmingham, approximately 34.5km from RRH Neatishead, and would be visible to radar systems deployed at both sites. Wind turbines have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity 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 deter aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom. Close examination of the proposed development has identified that the turbines will have a significant and detrimental effect on Air Defence operations. For this reason, MOD must object to the proposal.

I can confirm that the MOD has been contacted by the applicant's representatives who have informed us of their intent to submit a suitable mitigation proposal to cover both the Sheringham Shoal and Dudgeon elements of the application. To date the MOD has not received a mitigation proposal. It should also be noted that the applicant's draft Development Consent Order requirement no. 27 (Ministry of Defence Surveillance Operations) mentions the possibility of mitigating the impact of this development on radar systems deployed at RRH Trimmingham only; it does not include any mention of the radar systems deployed at RRH Neatishead. Given these reasons, MOD cannot agree to the draft Development Consent Order requirement no. 27 (Ministry of Defence Surveillance Operations).

Should MOD receive a mitigation proposal, we will request that relevant Subject Matter Experts assess the proposal to determine its acceptability. In the event that an acceptable mitigation proposal is provided, MOD will consider the inclusion of suitable suspensive requirement(s) to ensure that the development is erected and operated in such a way as to address the impact of the development on the air defence radar capability. It is not possible to provide the wording of any suspensive requirement (Air Defence Surveillance Operations) until such a mitigation proposal has been submitted, assessed, and accepted by MOD.

MOD respectfully requests that sufficient consideration and weighting is given to the MOD objection and the information provided above. Air Defence capability is fundamental to national security and should not be compromised.

Landfall and Onshore Works

The submitted Onshore Works Plan, Sheet 1 of 40 (APFP Regulations Reference: 5(2)(j) Application Doc. no.: 2.6) illustrates the extent of landfall and onshore connection works. Areas designated on that plan to provide temporary working areas, an access track, and the permanent access to the landfall would be within a statutory safeguarding zone associated with a technical asset at RAF Weybourne.

At this time the form of any structures necessary to provide the onshore connection has not been provided and it is not known whether implementation would require the creation of construction compounds, the use of plant equipment, or ground works. For these reasons, the MOD must object to draft Development Consent Order requirement no. 10 (Detailed Design Parameters Onshore).

The applicant should submit the details and information mentioned in the above paragraph to the MOD. On receipt, MOD will assess the details and information to determine any unacceptable impacts upon the effective operation of the technical asset at RAF Weybourne.

When MOD has a fuller understanding of the details and information, it will consider the inclusion of suitable suspensive requirement(s) to ensure that the onshore elements of the development are implemented in such a way as to not impact on the effective operation of the technical asset sited at RAF Weybourne. It is not possible to provide the wording of any suspensive requirement (Detailed Design Parameters Onshore) until such details and information have been submitted to and assessed by MOD.

In addition, MOD request that a requirement for a Construction Environment Management Plan is added to future draft Development Consent Orders to enable MOD to be consulted on the way development is carried out to ensure that the effective operation of a statutorily safeguarded technical asset is a not impacted.

Summary

For the avoidance of any doubt, MOD objects to the proposal on the grounds of the unacceptable impact that the development would have on:

- air defence radar systems sited at RRH Trimmingham and RRH Neatishead; and
- technical asset (communications equipment) sited at RAF Weybourne.

It is acknowledged that the applicant has specified requirements within their submitted draft Development Consent Order intended to address the above issues. However, at this time, MOD cannot accept the draft wording of the requirements 27 and 10.

I hope this adequately explains our position on the matter.

Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely

James Houghton
Senior Safeguarding Manager