



Defence Infrastructure Organisation

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Victoria Harrison
Five Estuaries Offshore Wind Farm Ltd

By email only

12 July 2024

Dear Victoria,

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

Thank you for consulting the Ministry of Defence (MOD) in advance of an application for the construction and operation of the Five Estuaries Offshore wind farm. Consultation correspondence was received by this office on 23 January 2024.

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 MOD previously responded to a consultation on a Scoping Opinion for the Five Estuaries Offshore Wind Farm through a letter dated 02 November 2021.

I write to provide the MOD safeguarding position on information provided in the Preliminary Environmental Information Report (PEIR) Statement.

It is acknowledged that the final design of this project has not yet been determined and that an indicative design envelope has been provided. Chapter 1 of the PEIR provides a description of the project, stating that the project could be made of up to 79 turbines, 420m to tip height mean high water springs (MHWS). The development is split into two array areas: the southern and northern array boundaries.

Air Defence Radar

Section 13.6.10 of Chapter 13 Military and Civil Aviation covers Military Aviation references the MOD's Air Defence (AD) Radars.

Wind turbines have been shown to have detrimental effects on the operation of AD 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.

Within section 13.6.11 and 13.6.12, it is recognised that the turbines would be visible and detected by the AD radars at RRH Trimmingham and RRH Neatishead.

Due to the relocation of the AD radar based at RRH Trimingham to RRH Neatishead, there is no requirement for the RRH Trimingham AD radar to be taken into account or mitigation provided.

The MOD has undertaken an assessment based on 79 wind turbines at 420m to tip height MHWS using the Rochdale Envelope boundary co-ordinates. Turbines within both the southern and northern array areas will be detectable to the AD Radar at RRH Neatishead. The impact of the turbines on the AD radar at RRH Neatishead will therefore need to be addressed through a suitable technical mitigation solution. It is the applicant's responsibility to provide a suitable technical mitigation solution to the MOD.

Mitigation to address the impact of the development on the AD Radar at RRH Neatishead is considered at 13.16.4. It is stated that engagement with the MOD will continue throughout the application process, this is welcomed.

The potential presence of unexploded ordnance (UXO) has been identified as a relevant consideration in section 1.4.11 of Chapter 1. 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.

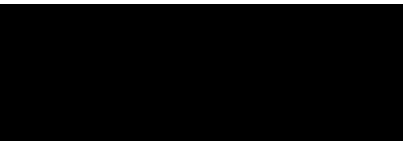
Impact on military low flying has been scoped in and the applicant states in the table 13.9 that they are committed to lighting and charting the turbines. In the interests of air safety, the MOD would request that the development be fitted with MOD accredited aviation safety lighting in accordance with the Civil Aviation Authority, Air Navigation Order 2016.

With regard to the remainder of the proposed development including the interarray cables and the export cables which will make landfall at Holland Haven, these elements would not pass through or occupy any MOD statutory safeguarding zones.

In relation to the onshore element of the proposed development, figure 1.1 of the Chapter 1 identifies the landfall zone to be on the shoreline of Holland Haven. The MOD hope to be consulted once the final landfall location has been decided to determine any impact on MOD assets. Going by the map of the onshore cable corridor, we have established that the corridor does not occupy any statutory safeguarding zones, however, as suggested in section 1.1.6 more information will be provided in the Development Consent Order application. The MOD request that we are consulted once the cable route and onshore landfall location is finalised.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

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Teena Oulaghan
Safeguarding Manager