



# Defence Infrastructure Organisation

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Application Ref: EN010125

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Our Reference: DIO10053433

The Planning Inspectorate  
Temple Quay House  
Temple Quay  
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BS1 6PN

06 September 2024

Dear Sir/Madam,

**NOTICE OF ACCEPTANCE OF AN APPLICATION FOR A DEVELOPMENT CONSENT ORDER BY THE PLANNING INSPECTORATE (ON BEHALF OF THE SECRETARY OF STATE FOR ENERGY SECURITY AND NET ZERO) UNDER SECTION 56 OF THE PLANNING ACT 2008**

**DOGGER BANK SOUTH OFFSHORE WIND FARMS PROJECT**

**REGULATIONS 8 AND 9 OF THE INFRASTRUCTURE PLANNING (APPLICATIONS: PRESCRIBED FORMS AND PROCEDURE) REGULATIONS 2009**

**REGULATION 16 OF THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017**

Thank you for consulting the Ministry of Defence (MOD) in relation to the application for an order granting development consent for the Dogger Bank South Offshore Wind Farm through your communication dated 23 July 2024.

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.

I write to advise the safeguarding position of the MOD in relation to the above application to construct and operate the Dogger Bank Offshore Wind Farm.

This scheme will comprise of up to 200 wind turbines, with a maximum height to blade tip of up to 394.08 metres above Mean Low Water Springs (MHWS) that will be located in the North Sea on the Dogger Bank. In addition to the turbine structures there will be offshore platforms, including offshore Collector Platforms (CPs) and / or converter platforms (OCPs), an Electrical Switching Platform (ESP) and an Accommodation; foundation structures for wind turbines and offshore platforms; array cables; Inter-platform cables; offshore Export Cables from the Array Areas to the landfall; landfall works seaward of Mean Low Water Springs (MLWS) for a long trenchless crossing; and scour/cable

protection (where required). The onshore components from the landfall near Skipsea travel west before reaching the Onshore Substation Zone located at Beverley Road along the A1079 and A164.

Following consultation, the MOD requested additional information from the applicant that is necessary to complete assessments of the proposed development. The information requested was provided on 23<sup>rd</sup> August 2024, whilst assessments have been initiated, we have not yet received all required responses. Therefore, this response reflects those representations provided to this date, the MOD will update its position, if required, following completion of all outstanding assessments.

The principal concerns of the MOD with respect to this proposed wind farm relate to the impact of the development on the operation and capability of air defence radar systems, and the potential to create a physical obstruction to air traffic movements.

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 radar deployed at RRH Staxton Wold.

### **Air Defence (AD) radar**

The proposed turbines would be located approximately 123.2km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Staxton Wold.

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.

Our assessments have determined that, when operational, the proposed wind farm will cause unacceptable and unmanageable interference to the effective operation of air defence radar deployed at RRH Staxton Wold.

Therefore, on the basis of the information provided, and until a suitable mitigation scheme has been submitted, assessed, and accepted, the MOD must **object** to this proposal due to the impact it will have on the AD radar at RRH Staxton Wold.

### **Physical Obstruction**

In this case the development falls within Low Flying Area 11 (LFA 11). Within these areas fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location would introduce a physical obstruction to low flying aircraft operating in the area.

As this development includes structures that exceed a height of 60m above Highest Astronomical Tide (HAT) it would be subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to any CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

In the event that the applicant is able to overcome the Air Defence Radar objection detailed above, MOD would require that conditions are added to any consent issued requiring the submission, approval and implementation of an aviation lighting scheme, and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

### **Landfall and Onshore**

Amongst the additional information provided by the applicant is a map showing the position of landfall and the extent of the onshore area of interest. I can confirm that the area of interest identified is not covered by any statutory safeguarding zones. As the proposal matures MOD should be consulted so any potential impact on safeguarded MOD assets can be identified and assessed.

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 system sited at RRH Staxton Wold.

I trust this adequately explains our position on this matter.

Yours faithfully,

*Stefany Alves Veronese*

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