



Defence Infrastructure Organisation

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Application Ref: EN010125

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Our Reference: DIO10053433

Jo Dowling
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

29 January 2025

Dear Jo,

Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for an Order Granting Development Consent for the Dogger Bank South Offshore Wind Farms.

I write to provide the Ministry of Defence's (MOD) Relevant Representations (RR's) with regard to the application for an order granting development consent for the Dogger Bank South Offshore Wind Project.

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.

The proposed development would comprise up to 200 wind turbines, each with a maximum height to blade tip of up to 394.08 metres above Mean Low Water Springs (MHWS), the development would 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 Block; 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 location near Skipsea, travel west before reaching the Onshore Substation Zone located at Beverley Road along the A1079 and A164.

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 an Air Defence (AD) radar deployed at Remote Radar Head (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 the 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.

The applicant’s response to Relevant Representations (RRs) in PDA-013 (dated October 2024 revision 01) acknowledges the AD radar objection and have confirmed mitigation is required. The MOD welcomes engagement on this matter. It is the applicant’s responsibility to provide a technical mitigation solution to the MOD. Unless, and until, a mitigation is submitted and accepted by the MOD, the MOD is unable to remove the objection or agree to a Requirement to address this issue.

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 Requirements 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.

The applicant’s response to RR’s in PDA-013 (dated October 2024 revision 01) acknowledges the need for the turbines to be installed with Aviation Warning Lighting (AWL) and charted. In addition, the MOD would require that any other associated tall structures i.e. Offshore Platforms that exceed 60 metres above HAT are also installed with AWL and charted.

Landfall and Onshore

Amongst the additional information provided by the applicant is a map showing the position of the export cable landfall location, 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, or any changes made, 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 sincerely,

Teena Oulaghan

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Safeguarding Manager