



Defence Infrastructure Organisation

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Louise Harraway
Case Manager
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

12 September 2024

By email only

Dear Louise,

The Planning Act 2008 (as amended) and The Infrastructure Planning (Examination Procedure) Rules 2010 (as amended) – Rule 9 and Rule 17

Application by Total Energies and Corio Generation for an Order Granting Development Consent for the Outer Dowsing Offshore Wind Project

Through the Rule 6 letter dated 4 September 2024 the Examining Authority requested that Principal Areas of Disagreement Statements (PADS) are prepared and submitted to meet the pre-Examination Procedural Deadline. The Defence Infrastructure Organisation (Ministry of Defence) is identified as one of the parties that should submit a PADS.

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.

Please find attached to this letter the initial PADS prepared by the MOD.

The MOD submitted relevant representation through a letter dated 12 June 2024, a copy of that letter is provided at Appendix B for your convenience.

Yours sincerely,

[REDACTED]

Stefany Alves Veronese
Assistant Safeguarding Manager

(Appendix A and B Enclosed)

Appendix A

Table 1 – Outstanding Principal Areas of Disagreement			
Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution
Air Defence Radar – RRH Neatishead	The proposed turbines would be located approximately 86.8km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Neatishead.	Applicant to submit mitigation scheme. The MOD will undertake technical and operational assessments to determine whether the proposed mitigation is viable. Should the proposed mitigation be considered viable, MOD may be in a position to offer a draft requirement wording to the applicant. At such time as that requirement wording has been agreed, MOD may withdrawal the objection on this area of concern.	
Air Defence Radar – RRH Staxton Wold	The proposed turbines would be located approximately 119.4km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Staxton Wold.	Applicant to submit mitigation scheme. The MOD will undertake technical and operational assessments to determine whether the proposed mitigation is viable. Should the proposed mitigation be considered viable, MOD may be in a position to offer a draft requirement wording to the applicant. At such time as that requirement wording has been agreed, MOD may	

		withdrawal the objection on this area of concern.	
Aviation Lighting – Low Flying Area 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.	Compliance with Requirement set out at Schedule 1, Part 3, Requirement 27 of the Draft Consent Order (Document reference: 3.1, Rev. 2.0, July 2024).	
Aviation Safety – Low Flying Area 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.	<p>Compliance with Requirement set out at:</p> <p>Schedule 10, Part 2, Condition 10 Schedule 11, Part 2, Condition 10</p> <p>MOD request that conditions similar to those set out in Sch. 10, Pt 2, Cond. 10 and Sch. 11, Pt. 2, Cond. 10 are applied to:</p> <p>Schedule 12, Part 2 Schedule 13, Part 2 Schedule 14, Part 2 Schedule 15, Part 2</p>	

Table 2 – Resolved Principal Areas of Disagreement

Area of Concern	Explanation	Remedy Measures	Likelihood of Resolution

Appendix B



Defence
Infrastructure
Organisation

Teena Oulaghan
Safeguarding Manager
Ministry of Defence
Safeguarding
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Telephone: [REDACTED]

E-mail: [REDACTED]@mod.gov.uk

Application Ref: EN010130

Our Reference: DIO10055904

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

12 June 2024

Dear Sir/Madam,

PLANNING ACT 2008 - APPLICATION FOR DEVELOPMENT CONSENT GT R4 LIMITED, TRADING AS OUTER DOWSING OFFSHORE WIND. THE PROPOSED OUTER DOWSING OFFSHORE WIND FARM ORDER.

Thank you for consulting the Ministry of Defence (MOD) in relation to the application for an order granting development consent for the Outer Dowsing Offshore Wind Farm through your communication dated 19 March 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 applications to construct and operate the Outer Dowsing Offshore Wind Farm.

This scheme will comprise of up to 100 wind turbines, with a maximum height to blade tip of up to 403 metres above Lowest Astronomical Tide (LAT) that will be located approximately 54km east of the Lincolnshire coast. In addition to the turbine structures there will be up to 4 Offshore Substation Platforms (OSPs), a offshore accommodation platform and 2 Artificial Nesting Structures. The OSP's will be connected via interconnector cables. Up to 4 offshore export cables will then connect the OSP's to the landfall at Wolla Bank, on the Lincolnshire coastline, south of Anderby Creek. The onshore components from landfall at Wolla Bank to Surfleet Marsh where it will make to the grid.

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 radars deployed at Remote Radar Head (RRH) Neatishead and RRH Staxton Wold.

Air Defence (AD) radar

The proposed turbines would be located approximately 86.8km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Neatishead and approximately 119.4km from, detectable by, and will cause unacceptable interference to the ASD 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 Neatishead and RRH Staxton Wold.

The need to mitigate the impacts of the proposed development upon the effective operation of RRH Neatishead and RRH Staxton Wold has been recognised by the applicant and are set out in Chapter 16: Aviation, Radar, Military and Communications of the Offshore Environmental Statement (March 2024). Whilst the applicant has indicated the need to mitigate these impacts, to date no mitigation scheme has been submitted for assessment.

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 radars at both RRH Neatishead and 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.

In the event that the applicant is able to overcome the objections listed 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. The applicant has acknowledged the MOD requirement for MOD accredited aviation safety lighting in table 16.2 in Chapter 16, Aviation, Radar, Military and Communications of the Offshore Environmental Statement (March 2024).

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.

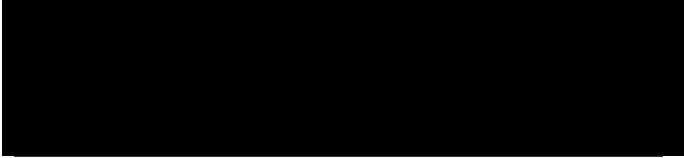
With regard to the remainder of the proposed development including the interarray cables and the export cables which will make landfall at Wolla Bank, these elements would not pass through or occupy any MOD statutory safeguarding zones.

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 Neatishead and RRH Staxton Wold.

I trust this adequately explains our position on this matter.

Yours faithfully,



Teena Oulaghan
Safeguarding Manager