

Outer Dowsing Offshore Wind

(Draft) Statement of Common Ground with the Ministry of Defence

Deadline 1

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Acronyms & Definitions

Abbreviations / Acronyms

Abbreviation / Acronym	Description
ADR	Air Defence Radar
AICs	Aeronautical Information Circular
ATAs	Aerial Tactics Areas
dML	Deemed Marine License
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement
GT R4 Limited	GT R4 or GT R4 Limited, the incorporated joint venture development Co.
GW	Gigawatt
LAT	Low Astronomical Tide
MOD	Ministry of Defence
NOTAMs	Notices to Airmen
ODOW	Outer Dowsing Offshore Wind (The Project)
OSS	Offshore Substation
OWIC	Offshore Wind Industry Council
PEXA	Practice and Exercise Areas
PEIR	Preliminary Environmental Information Report
RMSA	Radar Mitigation Scheme Agreement
RRH	Remote Radar Head
SoCG	Statement of Common Ground
UK	United Kingdom
UXO	Unexploded ordnance
WAM	Wide Area Multilateration

Terminology

Term	Definition
Deemed Marine Licence (dML)	A marine licence set out in a Schedule to the Development Consent Order and deemed to have been granted under Part 4 (marine licensing) of the Marine and Coastal Access Act 2009.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement (ES).

Term	Definition
Environmental Statement (ES)	The suite of documents that detail the processes and results of the EIA.
Export Cables	High voltage cables which transmit power from the Offshore Substations (OSS) to the Onshore Substation (OnSS) via an Offshore Reactive Compensation Platform (ORCP) if required, which may include one or more auxiliary cables (normally fibre optic cables).
Impact	An impact to the receiving environment is defined as any change to its baseline condition, either adverse or beneficial.
Landfall	The location at the land-sea interface where the offshore export cables and fibre optic cables will come ashore.
Mitigation	Mitigation measures are commitments made by the Project to reduce and/or eliminate the potential for significant effects to arise as a result of the Project. Mitigation measures can be embedded (part of the project design) or secondarily added to reduce impacts in the case of potentially significant effects.
Offshore Substation (OSS)	A structure attached to the seabed by means of a foundation, with one or more decks and a helicopter platform (including bird deterrents), containing— (a) electrical equipment required to switch, transform, convert electricity generated at the wind turbine generators to a higher voltage and provide reactive power compensation; and (b) housing accommodation, storage, workshop auxiliary equipment, radar and facilities for operating, maintaining and controlling the substation or wind turbine generators
Onshore Infrastructure	The combined name for all onshore infrastructure associated with the Project from landfall to grid connection.
Onshore Substation (OnSS)	The Project’s onshore HVAC substation, containing electrical equipment, control buildings, lightning protection masts, communications masts, access, fencing and other associated equipment, structures or buildings; to enable connection to the National Grid
Outer Dowsing Offshore Wind (ODOW)	The Project.
Preliminary Environmental Information Report (PEIR)	The PEIR was written in the style of a draft Environmental Statement (ES) and provided information to support and inform the statutory consultation process during the pre-application phase.
The Applicant	GT R4 Ltd. The Applicant making the application for a DCO. The Applicant is GT R4 Limited (a joint venture between Corio Generation (and its affiliates), Total Energies and Gulf Energy Development (GULF)), trading as Outer Dowsing Offshore Wind. The Project is being developed by Corio Generation, TotalEnergies and GULF.
The Project	Outer Dowsing Offshore Wind, an offshore wind generating station together with associated onshore and offshore infrastructure.
Receptor	A distinct part of the environment on which effects could occur and can be the subject of specific assessments. Examples of receptors include species (or groups) of animals or plants, people (often categorised

Term	Definition
	further such as 'residential' or those using areas for amenity or recreation), watercourses etc.

1 Introduction

1.1 Outer Dowsing Offshore Wind (ODOW)

1. Outer Dowsing Offshore Wind ('The Project') is a proposed offshore windfarm comprising both offshore and onshore infrastructure, including an offshore generation station (windfarm) located approximately 54km from the Lincolnshire coastline, export cables to landfall, onshore cables, connection to the electricity transmission network and ancillary and associated development.
2. The Project will have a total installed capacity of 1.5GW which is roughly equivalent to the annual electricity consumption of over 1.6million UK households.

1.2 Purpose of this Statement of Common Ground (SoCG)

3. The Ministry of Defence (MOD) is a ministerial department of the UK Government, responsible for implementing the defence policy set by the UK Government.
4. This SoCG has been prepared by the Applicant and the MOD to identify topics that are relevant to the MOD's remit and state whether relevant matters are agreed, not agreed or still in discussion. If relevant, where matters are not agreed, an explanation is provided as to whether these matters are of consequence or not.
5. This SoCG has been prepared with due regard to the Planning Act 2008: Guidance on the examination stage for Nationally Significant Infrastructure Projects (2024).

1.3 Consultation

6. The Applicant has and continues to engage with the MOD, including through bilateral consultation and consultation under s42 of the Planning Act 2008 (the 2008 Act). A summary of the consultation is set out in Table 1.

Table 1: Summary of Consultation

Date of Engagement	Engagement	Topic
30/08/2022	Response in Scoping Opinion	Air Defence Radar (ADR) Southern Managed Danger Area Danger Areas associated with Air Weapons Ranges at Donna Nook (EGD307) and Holbeach (EGD207) The Wash North and South Aerial Tactics Areas (ATAs) Practice and Exercise Areas (PEXA) Aviation safety lighting on the turbines
28/07/23	Phase 2 Consultation (Section 42 consultation on the PEIR)	UXO surveys and clearance MOD PEXA Donna Nook or Holbeach Air Weapons Ranges. Wide Area Multilateration (WAM) network

Date of Engagement	Engagement	Topic
		Air Defence radars deployed at (Remote Radar Head) RRH Staxton Wold and RRH Neatishead Air Traffic Control radars deployed at military aerodrome Notices to Airmen (NOTAMs) and Aeronautical Information Circulars (AICs)
01/02/24	Online meeting	update Project update Bilateral discussion on radar assessment and mitigation solutions
2022-ongoing	OWIC Taskforce	Aviation Joint industry strategic workstream.

1.4 Topics addressed in this Statement of Common Ground

7. Table 2 sets out the topics addressed in this SoCG. The topics referred to are referenced against the relevant chapter of the Environmental Statement (ES) or other Development Consent Order (DCO) application plans and documents.

Table 2: Topics Included in this SoCG

Topic	Application Documents and references
Aviation & Radar	Chapter 16 Aviation, Radar, Military and Communication (AS1-04).

1.5 Identification of items agreed/not agreed/in discussion

8. This SoCG sets out the relevant topics and identifies them as agreed, not agreed or in discussion using a colour coding system. The colour coding system used throughout the document is summarised in Table 3.

Table 3: Colour coding system

Classification	Meaning
Agreed	Agreement has been reached between the parties
In discussion	This matter has not been 'agreed' or 'not agreed' but discussions are continuing, or information is to be provided with the intention of reaching agreement.
Not agreed (No material impact)	This matter has not been agreed, but discussions have been concluded and it is considered that it does not have a material impact.
Not Agreed	This matter has not been agreed and discussions are not currently on-going.

2 Statement of Common Ground

2.1 Aviation, Radar, Military and Communication

9. The Applicant has assessed potential impacts of the Project on aviation, radiator, military and communication receptors during the construction, operation and maintenance and decommissioning phases as set out in Chapter 16 Aviation, Radar, Military and Communication (AS1-042).

Table 4: Areas of common ground in respect of aviation

Ref	ODOW Position	MOD Position	Status
MOD1	The wording of Schedule 10, Part 2, Condition 10 of the deemed marine licences (dML) forming Schedule 10 (Deemed marine licence under the 2009 Act - generation assets) and Schedule 11 (Deemed licence under the 2009 Act – offshore transmission assets) of the draft DCO (PD1-024) pertaining to aviation safety is appropriate and adequate"	<p>The condition identified (Schedule 10, Part 2, Condition 10) requires the submission of sufficient data to ensure that the development is appropriately and accurately charted.</p> <p>The condition identified (Schedule 11, Part 2, Condition 10) requires the submission of sufficient data to ensure that the development is appropriately and accurately charted.</p> <p>Any works that would result in an offshore structure that would exceed a height of 50m LAT should be subject to a similar condition.</p> <p>The artificial nesting structures that form the subject of Schedules 12, 13, 14 and 15, would exceed a height of 50m LAT and as such the condition identified above should be applied in each case.</p>	In discussion

Ref	ODOW Position	MOD Position	Status
MOD2	<p>The Export Cable Corridor is outside the Air Weapons Range.</p>	<p>The MOD have assessed the export cable corridor and landfall and can confirm these elements do not enter or pass through any Air Weapons Range.</p> <p>The Onshore cable corridor may pass through the statutory safeguarding zone surrounding Holbeach Air Weapons Range. The MOD should be consulted on any works carried out within this zone.</p>	In discussion
MOD3	<p>Air Defence Radar – Remote Radar Head (RRH) Neatishead and RRH Staxton Wold</p> <p>The Applicant is an active member of the Offshore Wind Industry Council (OWIC) Aviation Taskforce which is leading on establishing strategic technical solutions for radar mitigation. The Applicant is working with the OWIC Aviation Taskforce to deliver mitigation solutions for the affected radar stations and is confident that measures will be in place prior to construction commencing. The proposed mitigation will be secured by an industry standard Radar Mitigation Scheme Agreement (RMSA).</p> <p>The Applicant will continue to engage with the MOD to develop an appropriate mitigation scheme and address the concerns raised by the MOD.</p>	<p>The proposed turbines would be located approximately 86.8km from RRH Neatishead and 119.4km from RRH Staxton Wold, and would be detectable by, and will cause unacceptable interference to, the air defence radar at both locations.</p> <p>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 draft wording for requirement(s) to the applicant. At such time as the wording of any requirement(s) have been agreed, MOD may withdraw the objection on this area of concern.</p>	In discussion
MOD4	<p>Aviation Lighting – Low Flying Area 11</p>	<p>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>	In discussion

Ref	ODOW Position	MOD Position	Status
	<p>The wording of Schedule 1, Part 3, Requirement 27 of the draft DCO (PD1-024) pertaining to aviation lighting is appropriate and adequate to secure the required aviation lighting:</p> <p><i>“27.(1) The undertaker must exhibit such lights, with such shape, colour and character as are required in writing by Air Navigation Order 2016 and determined necessary for aviation safety in consultation with the Defence Infrastructure Organisation Safeguarding and as directed by the Civil Aviation Authority.</i></p> <p><i>(2) Lighting installed specifically to meet Ministry of Defence aviation safety requirements must remain operational for the life of the authorised development unless otherwise agreed in writing with the Ministry of Defence.”</i></p>	<p>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).</p> <p>Note that MOD must be consulted on any proposed aviation safety lighting scheme to ensure that lights meet MOD requirements.</p>	

3 Signatures

The above statement of common ground has been prepared by Outer Dowsing Offshore Wind and the Ministry of Defence and is agreed on the date below.

Signed for the Ministry of Defence	
Name	
Position	
Date	
Duly authorised for and on behalf of the Ministry of Defence	

Signed for Outer Dowsing Offshore Wind	
Name	
Position	
Date	
Duly authorised for and on behalf of Outer Dowsing Offshore Wind	

References

Department for Levelling Up, Housing and Communities (2024) Planning Act 2008: Guidance for the examination of applications for development consent.