

**From:** NATS Safeguarding <[NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)>  
**Sent:** Thursday, October 31, 2024 2:17 PM  
**To:** Outer Dowsing Offshore Wind <[OuterDowsingOffshoreWind@planninginspectorate.gov.uk](mailto:OuterDowsingOffshoreWind@planninginspectorate.gov.uk)>;  
Outer Dowsing Offshore Wind <[contact@outerdowsing.com](mailto:contact@outerdowsing.com)>  
**Cc:** Chris Jenner [REDACTED]; NATS Safeguarding  
<[NATSSafeguarding@nats.co.uk](mailto:NATSSafeguarding@nats.co.uk)>; Greg Tomlinson [REDACTED] ROSSI,  
Sacha [REDACTED]  
**Subject:** EN010130 ODOW DCO Application - Change Consultation [SG33815]

You don't often get email from [REDACTED]

Interested Party Reference number: 20048583

Dear Sirs, we acknowledge receipt of the correspondence sent by email and surface mail dated 29-10-24 relating to the introduction of an ORBA, as summarised below. This change to the Application has no impact on NATS's previous position or the mitigation that is currently being investigated and currently being discussed with the Applicant. Accordingly, our position remains unchanged and as previously communicated to the Inspectorate (attached). We will be happy to keep the Inspectorate apprised of any progress.

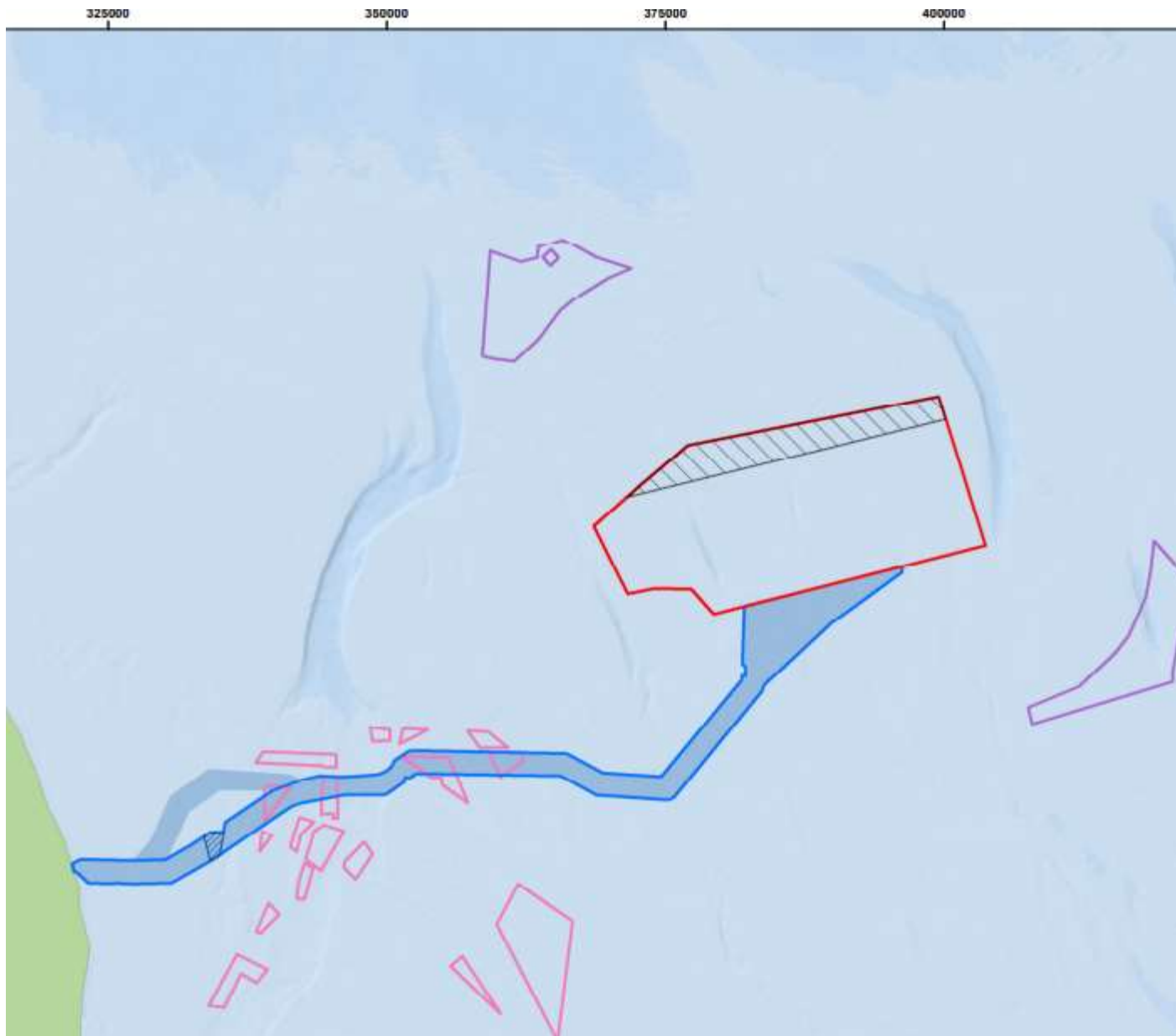
Regards  
S. Rossi  
NATS Safeguarding Office

#### **The Proposed Change and Supporting Documents**

The Applicant has proposed the introduction of an ORBA over the northern section of the array area, comprising an area that is approximately 2km wide at the north-east corner and approximately 3.5km at the north-west corner (see Appendix A, Figure 1.0 of PD1-082<sup>6</sup>). In total, the ORBA covers an area of 71.3km<sup>2</sup>, which represents 16.4% of the array area. Requirement 4, Part 3 of Schedule 1 of the draft DCO<sup>7</sup> (PD1-024) and condition 1, Part 2 of the deemed marine licences forming Schedules 10 and 11 of the draft DCO have been updated to provide that no wind turbine generators or offshore platforms will be installed in the ORBA, the co-ordinates for which are set out in the said requirement and conditions. However, the area may be used for cable installation and ancillary operations during construction (and decommissioning) and operations and maintenance works. Project parameters including number of structures, foundation types, and cable parameters will remain unchanged.

....determine if they agree with the Applicant's consideration of the implications for the conclusions in Chapter 16 Aviation, Radar, Military and Communication<sup>5</sup> (AS1-042) of the Environmental Statement ("ES"). In particular, the ExA stated that they "*would welcome confirmation of any possible effects relating to aviation and radar arising from the possibility of a more condensed layout of WTGs within the array area as a result of the ORBA.*"

NATS En Route Ltd is therefore being consulted on the Proposed Change.



**NATS**

Sacha Rossi  
ATC Systems Safeguarding Engineer

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**From:** [NATS Safeguarding](#)  
**To:** [Outer Dowsing Offshore Wind](#)  
**Subject:** FW: EN010130 - Outer Dowsing Offshore Wind - EIA Scoping Notification and Consultation [SG33815]  
**Attachments:** [image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
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[image011.png](#)  
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[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image012.png](#)  
[SG33815 Outer Dowsing Offshore Wind Farm - TOPA Issue 1.pdf](#)

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Our Ref: SG33815

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG33815.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

**NATS**

NATS Safeguarding

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NATS Public

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**From:** NATS Safeguarding

**Sent:** 25 August 2022 11:55

**To:** Outer Dowsing Offshore Wind <[OuterDowsingOffshoreWind@planninginspectorate.gov.uk](mailto:OuterDowsingOffshoreWind@planninginspectorate.gov.uk)>

**Subject:** RE: EN010130 - Outer Dowsing Offshore Wind - EIA Scoping Notification and Consultation [SG33815]

Our Ref: SG33815

Dear Sir/ Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams. In the timeframe given to us we have been unable to thoroughly investigate the effects of the proposed development on our Operations, however, the relevant teams are being consulted.

Based on our preliminary technical findings, the proposed development does conflict with our

safeguarding criteria. Accordingly, NATS (En Route) plc objects to the proposal. We will notify you within 4-6 weeks of the results of our operational assessment. Only if this assessment shows the impact to be acceptable will we be able to withdraw our objection.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission for a wind farm. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are further obliged to notify both NATS and the Civil Aviation Authority ("CAA") of that fact (which may lead to the decision made being subject to review whether by the CAA referring the matter for further scrutiny or by appropriate action being taken in the courts).

As this further notification is intended to allow the CAA sufficient time to consider whether further scrutiny is required, we understand that the notification should be provided prior to any granting of permission. You should be aware that a failure to consult NATS, or to take into account NATS's comments when deciding whether to approve a planning application, could cause serious safety risks for air traffic.

If you have any queries regarding this matter you can contact us using the details as below.

Yours faithfully

**NATS**

NATS Safeguarding

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NATS Public

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**From:** Outer Dowsing Offshore Wind

<[OuterDowsingOffshoreWind@planninginspectorate.gov.uk](mailto:OuterDowsingOffshoreWind@planninginspectorate.gov.uk)>

**Sent:** 02 August 2022 10:52

**Subject:** [EXTERNAL] EN010130 - Outer Dowsing Offshore Wind - EIA Scoping Notification and Consultation

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Dear Sir/Madam

Please see attached correspondence on the proposed Outer Dowsing Offshore Wind.

Please note the deadline for consultation responses is **30 August 2022** and is a statutory requirement that cannot be extended.

Kind regards,

Marie Shoemith



The Planning  
Inspectorate

**Marie Shoemith** | Senior EIA Advisor  
The Planning Inspectorate



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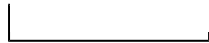
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# Technical and Operational Assessment (TOPA)

For Outer Dowsing Offshore  
Wind Farm Development

NATS ref: SG33815

Issue 1

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## Publication History

Issue	Month/Year	Change Requests and summary
1	September 2022	Scoping Consultation

## Document Use

External use: Yes

## Referenced Documents



# 1. Background

## 1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

## 2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

### 3. Application Details

The Planning Inspectorate submitted a request for a NATS technical and operational assessment (TOPA) for the development at Outer Dowsing Offshore Wind Farm. It will comprise a large number of turbines up to 403m in height within the boundary points as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North
A	53.6207	1.1227	606623	418327
B	53.6738	1.4646	628938	425284
C	53.5325	1.5458	635082	409832
D	53.4738	1.1804	611166	402162
E	53.4940	1.1515	609146	404327
F	53.4919	1.0499	602424	403800
G	53.5378	0.9933	598450	408741

**Table 1 – Turbine Details**

### 4. Assessments Required

The proposed development falls within the assessment area of the following systems:

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Claxby Radar	53.4501	-0.3083	46.9	86.9	83.5	CMB
Clee Hill Radar	52.3983	-2.5975	147.1	272.5	62.0	CMB
Cromer Radar	52.9104	1.3496	34.4	63.7	249.7	CMB
Debden Radar	51.9902	0.2638	94.7	175.3	19.9	CMB
Great Dun Fell Radar	54.6841	-2.4509	139.8	258.8	116.4	CMB
Pease Pottage Radar	51.0834	-0.2143	152.0	281.5	19.0	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
None						

**Table 2 – Impacted Infrastructure**

## 4.1. En-route RADAR Technical Assessment

### 4.1.1. Predicted Impact on Claxby RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.2. Predicted Impact on Cromer RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

### 4.1.3. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Aberdeen ATC	Unacceptable
Prestwick Centre ATC	Unacceptable
Swanwick ATC	Unacceptable
Military ATC	Unacceptable

*Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.*

## 4.2. En-route Navigational Aid Assessment

### 4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

## 4.3. En-route Radio Communication Assessment

### 4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

## 5. Conclusions

### 5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

## Appendix A – Background RADAR Theory

### Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of  $P_t$  the power density,  $P$ , at a range of  $r$  is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where  $G_t$  is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of  $\sigma$ , this can be treated as if the object re-radiates the pulse with a gain of  $\sigma$  and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area,  $A_e$ , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where  $G_r$  is the RADAR antenna's receive gain in the direction of the object and  $\lambda$  is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable  $L$

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

## Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where  $r_t$  and  $r_r$  are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_t P_t}{r_t^2 P_r L}}$$

## Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

## Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams



Figure 1: Proposed development location shown on an airways chart

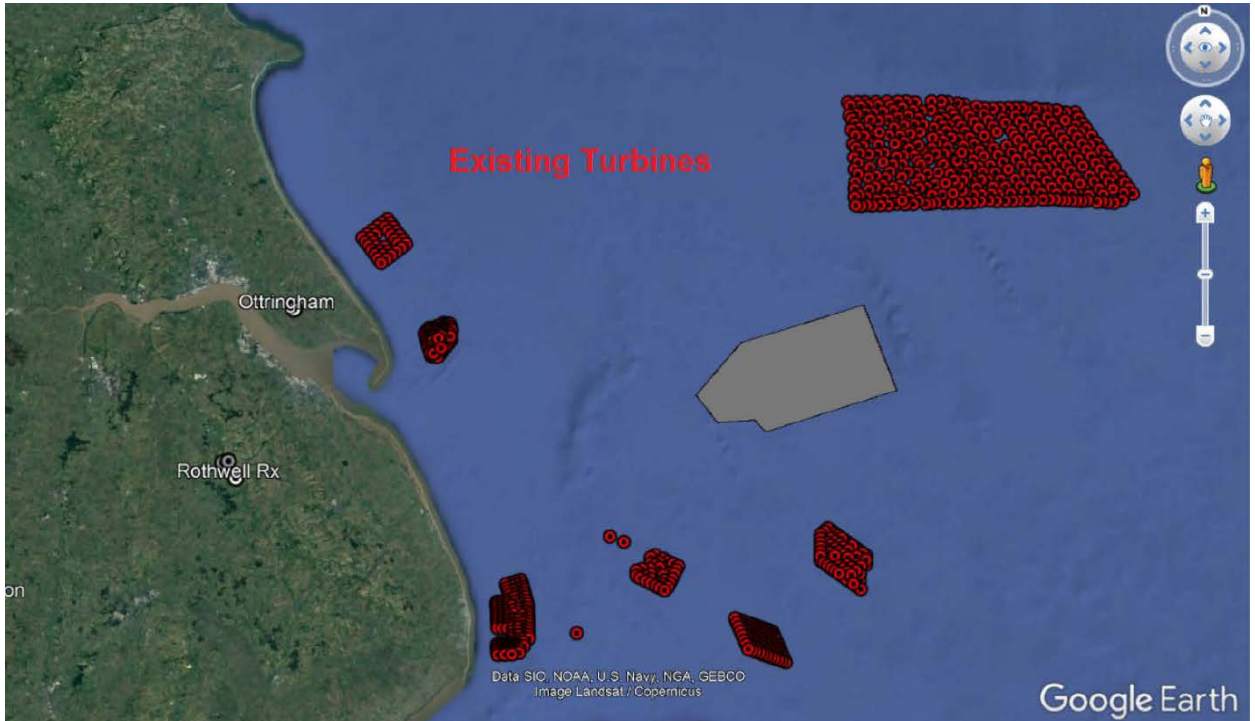


Figure 2: Proposed development shown alongside other recently assessed applications

- consented/built
- impact -accepted
- impact -objection
- mitigated
- mitigation -proposed
- no impact
- refused/withdrawn