



Defence Infrastructure Organisation

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Application Ref: EN010125

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19 March 2025

Dear Jo

EN010125: Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for the Dogger Bank South Offshore Wind Farm Project

Examining Authority's (ExA) Written Questions – ExQ1.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represent 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, technical sites or maritime defence assets and interests.

The MOD has previously responded to consultation on the Dogger Bank South Offshore Wind Farm Project setting out an objection on the basis that the development proposed would have a significant and detrimental impact on the operation and capability of Air Defence Radar systems sited/deployed at RRH Staxton Wold.

This letter is submitted in response to the Examining Authority's written questions, issued on 28 February 2025. Responses are provided to those questions marked for the attention of the Ministry of Defence (Defence Infrastructure Organisation) only. The wording of those questions addressed to Ministry of Defence (MOD) have been used to structure this response.

- **Question ref. ARMC.1.2 – Notification periods.**

Are you supportive of the fourteen and five-day notification periods in Condition 12 of DML 1 [REP1-004] and do you have any other comments on the condition as drafted? The ExA notes this condition is repeated in other DMLs and will consider comments received relevant for all instances.

The MOD acknowledge that the condition identified appears in the applicant's draft Development Consent Order (Application Ref: 3.1 Revision: 05 dated January 2025) within

the Deemed Marine Licence (DML) relating to Dogger Bank South (DBS) East Project Offshore Generation (Sch. 10, Pt.2, Cond. 12), and is replicated in DMLs relating to DBS West Project Offshore Generation (Sch. 11, Pt.2, Cond. 12), DWS East Project Offshore Transmission (Sch. 12, Pt.2, Cond. 10), DWS West Project Offshore Transmission (Sch. 13, Pt.2, Cond. 10), and DBS East Project and DBS West Project Offshore Transmission (Sch. 14, Pt.2, Cond. 8).

In each case the MOD consider that the time period for submitting charting data stipulated is acceptable.

- **Question ref. ARMC.1.5 – Southern Managed Danger Areas.**

In your Relevant Representation [AS-002], you explain the Proposed Development is within Low Flying Area 11. In addition, the Proposed Development is identified within the Southern Managed Danger Areas [APP-125, section 15.5.3] and [APP-126, Figure 15-2]. To aid the ExA in considering compliance with NPS EN-1 paragraph 5.5.59, can you confirm whether the Proposed Development would unacceptably limit military training, in isolation and cumulatively with other projects, including low flying aircraft operations.

The application site falls within an area which may be used for military low flying and is designated Low Flying Area 11 (LFA11). Within these low flying areas, aircraft may operate as low as 250 feet or 76.2 metres above surface level to conduct low level flight training. The introduction of turbines to this area creates a physical obstruction to low flying aircraft operating in the area. This impact would normally be addressed through the use of Requirements/Planning Conditions that require the submission, approval, and implementation of an aviation safety lighting plan and require the submission of sufficient information to ensure the development can be effectively charted. These Requirements are contained within the applicant's draft Development Consent Order (Application Ref: 3.1 Revision: 05 dated January 2025) within DML relating to DBS East Project Offshore Generation (Sch. 10, Pt.2, Cond. 12), DBS West Project Offshore Generation (Sch. 11, Pt.2, Cond. 12), DWS East Project Offshore Transmission (Sch. 12, Pt.2, Cond. 10), DWS West Project Offshore Transmission (Sch. 13, Pt.2, Cond. 10), and DBS East Project and DBS West Project Offshore Transmission (Sch. 14, Pt.2, Cond. 8).

The generation assets proposed would be located below a Danger Area complex designated EG D323. The EG D323 designation applies between flight level 05 (approximately 5000ft) and flight level 66 (approximately 66000ft). The development proposed would not be considered to have any significant impact on the operation or capability of that designated airspace, as such the MOD has offered no objection on this ground.

- **Question ref. IOU.1.16 – Ministry of Defence submarine practice and exercise area (PEXA)**

Can you provide details of the extent, purpose and current status of the submarine PEXA listed on admiralty charts in the region of the Order Limits into the Examination? Do you consider that the Proposed Development is likely to have any interactions with the PEXA which would lead to a significant effect(s), or would require mitigation?

The Flamborough Head Submarine Exercise Area is a rectangular area bounded by:

5415.0N5 - 5437.0N9
0000.00E0 – 00043.0E7

This Exercise Area extends over the area contained within the order limits for this project that define the area within which cables connecting the offshore wind farm to the UK coast may be installed. The Exercise Area does not extend over the development zone defined for the installation of wind turbine generators.

The Flamborough Head Submarine Exercise Area remains designated for use by NATO partner nations to conduct submarine training activities. It is not considered that the proposed development is likely to have any enduring adverse impacts upon the military training activities that may be undertaken within this Exercise Area. It is not considered that any specific mitigation measures are required to address any temporal displacement of the military training activities that may be conducted within this Exercise Area. The routine issuance of regular notices to mariners prior to the commencement of any installation or decommissioning works and associated survey works etc. for the proposed development would be sufficient to coordinate when military training activities are undertaken.

Current MOD position.

For clarity, the MOD maintain objection to the Dogger Bank South Offshore Wind Farms Project on the basis that the generation assets proposed would, by virtue of their siting and dimensions, have a significant and detrimental impact on the operation and capability of Air Defence Radar systems sited/deployed at RRH Staxton Wold. At this time the applicant has submitted no mitigation proposal designed to address the harm that would be exerted by the proposed development.

I trust this adequately explains our position on this matter. Should you require additional information, please do not hesitate to contact me.

Yours sincerely

WD Talbot

Wendy Talbot
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