



Defence Infrastructure Organisation

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03 February 2025

By email only

Dear [REDACTED]

Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind for the Outer Dowsing Offshore Wind project.

**The Examining Authority's further written questions and requests for information (ExQ2)
Issued on 13 January 2025**

This letter is submitted in response to the Examining Authority's written questions which were issued on 13 January 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, neither the text providing the context for each of those questions, or those questions directed at other parties have been replicated.

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, technical sites or maritime defence assets and interests.

Q2 CM 1.1 – Mitigation for Primary Surveillance Radar (PSR) Neatishead and Staxton Wold

The applicant's response to ExQ1 CM 1.1 [REP2-051] states that it is confident that the necessary mitigation for Neatishead and Staxton Wold will be in place by 2030 and therefore before the project is operational. The ExA also notes from the applicant's ExQ1 responses that it commits to provide an update on discussion with the DIO at deadline 4, including the proposal of a potential new requirement to address PSR mitigation.

Please confirm if the DIO is also confident that the necessary mitigation will be place prior to the operation of the project and provide preferred drafting of a new requirement to secure this.

The applicant sets out an expectation that a technical solution will be in place by 2030. In-service dates for enduring mitigation solutions at Staxton Wold and Neatishead are currently

unknown and until selection and approval within a procurement programme have occurred, and negotiations completed with respective suppliers, no such dates will be known. The MOD, naturally, will seek to implement such solutions at its earliest opportunity, but is dependent on the availability of something suitable, and the practicalities of achieving delivery, installation and acceptance testing of whatever is chosen. The MOD anticipates that a technical solution will be in place later than 2030. Detail is unknown until the conclusion of a MOD led competition to buy mitigation. It is not possible to provide a more definitive timescale for this at this stage. As set out in the response to ExQ1, the MOD may replace existing long range air defence surveillance capability at the end of its service. Replacement Air Defence radar system(s) will be selected to enable MOD to discharge its Defence Tasking and will aim to achieve wind farm mitigation. However, this will not be implemented for the affected air defence radar sites before the operational period for the proposed wind farm development commences.

Q2 CM 1.3 – Physical Obstruction.

The applicant's response to the DIO's answer to ExQ1 CM 1.2 [REP3-054] states that "Conditions providing for 'Aviation safety' have been added as Part 2, Condition 10 of the deemed marine licences contained in Schedules 12, 13, 14 and 15, as requested by the MoD"

Please confirm if the DIO is satisfied with the dDCO in this regard. If not, please provide alternative drafting.

The MOD note that the draft Development Consent Order [REP2-008] submitted at deadline 2 has been updated in line with the requests made by the MOD in response to the Examining Authorities first written questions. Specifically, conditions relating to Aviation safety have been added to the deemed Marine Licences for artificial nesting structures set out at schedules 12, 13, 14, and 15.

On that basis the MOD is content that the potential for elements of development to form unmarked physical obstructions to low flying aircraft have been addressed.

Q2 CM 1.4 – Holbeach Air Weapons Ranges

To the applicant and DIO:

The applicant and the DIO are invited to provide an update on discussions to confirm the spatial extent of the safeguarding zones associated with Holbeach Air Weapons Range, to identify any necessary mitigation and the means by which this would be secured.

The MOD acknowledge the applicant's position as set out on line identified Q1 CM 1.3 of the document with reference 19.2 Rev. 1.0 [REP2-051]. On the basis of the information provided it appears unlikely that the development proposed would require the use of tall (with a height exceeding 15m agl.) plant or equipment and therefore have any significant impact on the operation or capability of the safeguarded Air Weapons Range. To address any potential for the works required to implement the development forming a physical obstruction within the range, the Code of Construction requirement (Requirement no. 18) should include a provision that the maximum height of any plant/equipment required for onshore works should be clearly set out. The MOD should be identified as a consultee within that requirement.

Q2 CM 1.5 – Wide Area Multilateral (WAM) network

Please confirm if the DIO is satisfied with the applicant's response to ExQ1 CM 1.8 [REP2-051] as well as its feedback [REP3-054] on the DIO's own response to that question. If not, please specify necessary actions.

The MOD acknowledge the applicant's position as set out on line identified as ID Q1 CM 1.8 of the document with reference 19.2 Rev. 1.0 [REP2-051]. On the basis of the information provided it appears unlikely that the development proposed would require the use of tall (with a height exceeding 15m agl.) plant or equipment and therefore have any significant

impact on the operation or capability of the safeguarded technical asset. To address any potential for the works required to implement the development forming a physical obstruction within the range, the Code of Construction requirement (Requirement no. 18) should include a provision that the maximum height of any plant/equipment required for onshore works should be clearly set out. The MOD should be identified as a consultee within that requirement.

I trust this adequately explains the MOD position in response to relevant questions within the Examining Authority's written questions issued 13 January 2025.

Please do not hesitate to contact me should you require any additional information, or should you wish to discuss matters.

Yours sincerely

[Redacted Signature]

Safeguarding Manager