



Ministry of Defence

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Mr [Redacted]  
National Infrastructure Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

13 March 2025

**By email only**

Dear Mr Macarthur,

### **The Infrastructure Planning (Examination Procedure) Rules 2010 - Rule 17**

#### **Application by GT R4 Limited (trading as Outer Dowsing Offshore Wind) for an Order Granting Development Consent for the Outer Dowsing Offshore Wind project**

I write in response to the Rule 17 letter dated 5 March 2025 which was received by this office. Through that letter the Ministry of Defence (MOD) is asked to respond to a revised draft Development Consent Order prepared by the applicant and intended to address MOD concerns.

Through previous responses to consultation on the proposed Outer Dowsing Wind Farm project the MOD has set out objection to the proposed development on the basis that it would have a significant and detrimental impact on the effective operation and capability of air defence radar systems sited/deployed at Remote Radar Head (RRH) Staxton Wold and Remote Radar Head (RRH) Neatishead.

In addition, the MOD has identified that the development, during either or both the implementation and operational phases, has the potential to:

- introduce physical obstacles into Holbeach Air Weapons Range;
- introduce physical obstacles to the operation and/or capability of a technical asset known as the East 1 WAM network; and
- introduce physical obstacles to low flying aircraft.

With the intention of addressing the MOD objection due to the impact of the development on the operation and capability of air defence radar systems, the applicant has engaged with MOD regarding mitigation. The applicant has subsequently included Requirement 33 in their most recent draft Development Consent Order. In principle, the MOD accepts that such a requirement could secure mitigation, however, the wording proposed by the applicant does not meet the MOD's needs. As such, the MOD proffers alternative

requirement wording as set out at Annex A to this letter. This wording differs by making clear that any mitigation is required to be in place for the life of the development and by providing clarification as to the parties that would be involved in any arrangement required to agree and implement such mitigation.

Through further updates to the draft Development Consent Order the applicant has sought to address the MOD's outstanding concerns. The applicant has amended Requirement 18 to include stipulations that the MOD is to be consulted on:

**Work no. 12** – up to four underground cable circuits and up to six associated cable ducts to Work No. 13; and

**Work no. 13** – works consisting of—

- (a) up to six trenchless technique drilling launch pits;
- (b) up to four underground cable circuits and up to six associated cable ducts to Work No. 14;
- (c) up to four underground cable circuits and associated cable ducts from Work No. 14 to Work No. 15;
- (d) a landfall temporary works area;
- (e) storage areas;
- (f) drainage works;
- (g) construction of a haul road; and
- (h) vehicular access tracks, bellmouths and footpaths).

These works would be those most likely to impact on the operation and capability of both Holbeach Air Weapons Range and the East 1 WAM network. The MOD is satisfied that the updated wording of Requirement 18, as proposed by the applicant in the draft Development Consent Order, would address MOD concerns relating to the potential for the development, during both implementation and operational phases, to impact on those assets.

In response to the potential for the development to form an obstruction to low flying aircraft the applicant has included Requirement 27 which requires aviation safety lighting, as well as conditions within the proposed Deemed Marine Licences (Schedules 10, 11, 12, 13, 14, and 15) that require the submission of sufficient data to allow the development to be charted. As set out in the MOD's response to the Examining Authority's second written questions dated 3 February 2025, the inclusion of Requirement 27 and the application of conditions to deemed marine licences within any Development Consent Order that might be granted would be considered to address MOD concerns on this specific issue.

## Conclusion

In summary, subject to the Requirement wording set out at Annex A of this letter being added to any Development Consent Order that might be made, and the retention of the following Requirements and Conditions already set out in the applicant's draft Development Consent Order:

- Requirement 18 in the form set out in the draft Development Consent Order dated February 2025 (Document Ref: 3.1 Revision 8.0).
- Condition 10 – Aviation Safety at Schedule 10 Deemed Marine Licence under the 2009 Act – Generation Assets, Part. 2.
- Condition 10 – Aviation Safety at Schedule 11 Deemed Marine Licence under the 2009 Act – Offshore Transmission Assets, Part. 2.
- Condition 10 – Aviation Safety at Schedule 12 Deemed Marine Licence under the 2009 Act – Northern Artificial Nesting Structure 1, Part. 2.
- Condition 10 – Aviation Safety at Schedule 13 Deemed Marine Licence under the 2009 Act – Northern Artificial Nesting Structure 2, Part. 2.
- Condition 10 – Aviation Safety at Schedule 14 Deemed Marine Licence under the 2009 Act – Southern Artificial Nesting Structure 1, Part. 2. and
- Condition 10 – Aviation Safety at Schedule 15 Deemed Marine Licence under the 2009 Act – Southern Artificial Nesting Structure 2, Part. 2.

the MOD is content to withdraw its objection to this development.

I trust this adequately explains our position on this matter.

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

Yours sincerely,

[REDACTED]

Senior Safeguarding Manager

Enc. Annex A

## **Annex A**

### **Ministry of Defence Surveillance Operations**

1. No wind turbine generator forming part of the authorised development is permitted to rotate its rotor blades on its horizontal axis until the Secretary of State, having consulted with the Ministry of Defence, confirms satisfaction in writing that appropriate mitigation will be implemented and maintained for the life of the authorised development and that arrangements have been put in place with the Ministry of Defence to ensure that the approved mitigation is implemented.
2. For the purposes of this requirement—
  - a. “appropriate mitigation” means measures to prevent or remove any adverse effects which the authorised development will have on the air defence radar(s) at Remote Radar Head (RRH) Staxton Wold and Remote Radar Head (RRH) Neatishead, and the Ministry of Defence’s air surveillance and control operations;
  - b. “approved mitigation” means the detailed Radar Mitigation Scheme (RMS) that will set out the appropriate measures and timescales for implementation as agreed with the Ministry of Defence at the time the Secretary of State confirms satisfaction in writing in accordance with paragraph (1); and
  - c. “Ministry of Defence” means the Ministry of Defence as represented by Defence Infrastructure Organisation – Safeguarding, St George’s House, DIO Head Office, DMS Whittington, Lichfield, Staffordshire, WS14 9PY or any successor body.
3. The undertaker must thereafter comply with all other obligations contained within the approved mitigation for the life of the authorised development.