

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 16.1 Consultation Responses for Aviation,
Radar and Military

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Prepared By:	Cyrrus
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Glossary

Term	Definition
Array	All wind turbines, offshore platform(s), inter-array cables, and supporting sub-sea infrastructure within the DBD Array Area, as defined, when considered collectively, excluding the offshore export cables.
Array Area	The area within which the wind turbines, inter-array cables and offshore platform(s) will be located.
DBD	Dogger Bank D Offshore Wind Farm, also referred to as the Project in this PEIR.
Development Consent Order (DCO)	A consent required under Section 37 of the Planning Act 2008 to authorise the development of a Nationally Significant Infrastructure Project, which is granted by the relevant Secretary of State following an application to the Planning Inspectorate.
Effect	An effect is the consequence of an impact when considered in combination with the receptor's sensitivity / value / importance, defined in terms of significance.
Embedded Mitigation	<p>Embedded mitigation includes:</p> <ul style="list-style-type: none"> Measures that form an inherent part of the project design evolution such as modifications to the location or design of the development made during the pre-application phase (also known as primary (inherent) mitigation); and Measures that will occur regardless of the EIA process as they are imposed by other existing legislative requirements or are considered as standard or best practice to manage commonly occurring environmental impacts (also known as tertiary (inexorable) mitigation). <p>All embedded mitigation measures adopted by the Project are provided in the Commitments Register.</p>
Environmental Impact Assessment (EIA)	A 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 and includes the publication of an Environmental Statement.
Impact	A change resulting from an activity associated with the Project, defined in terms of magnitude.
Mitigation	<p>Any action or process designed to avoid, prevent, reduce or, if possible, offset potentially significant adverse effects of a development.</p> <p>All mitigation measures adopted by the Project are provided in the Commitments Register.</p>
Offshore	Area seaward of nearshore in which the transport of sediment is not caused by wave activity.

Term	Definition
Offshore Export Cable Corridor (ECC)	The area within which the offshore export cables will be located, extending from the DBD Array Area to Mean High Water Springs at the landfall.
Preliminary Environmental Information Report (PEIR)	The PEIR provides a draft environmental assessment and information to support and inform the statutory consultation process in the pre-application phase. The PEIR will be updated to produce the Project's ES that will accompany the DCO application.
Scoping Opinion	A written opinion issued by the Planning Inspectorate on behalf of the Secretary of State regarding the scope and level of detail of the information to be provided in the Applicant's Environmental Statement. The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.
Scoping Report	A request by the Applicant made to the Planning Inspectorate for a Scoping Opinion on behalf of the Secretary of State. The Scoping Report for the Project was submitted to the Secretary of State on 24 June 2024.
The Applicant	SSE Renewables and Equinor acting through 'Doggerbank Offshore Wind Farm Project 4 Projco Limited'.
The Project	Dogger Bank D (DBD) Offshore Wind Farm Project, also referred to as DBD in this PEIR.
Wind Turbines	Power generating devices located within the DBD Array Area that convert kinetic energy from wind into electricity.

16.1 Consultation Responses on Aviation, Radar and Military

- 1. **Volume 1, Chapter 16 Aviation, Radar and Military** for the Dogger Bank D Offshore Wind Farm (herein referred to as ‘the Project’ or ‘DBD’) has been informed by consultation with the Planning Inspectorate and stakeholders following the publication of the Scoping Report (Royal HaskoningDHV, 2024) and the comments contained within the Scoping Opinion (Planning Inspectorate, 2024). This appendix contains details of the relevant comments for Chapter 16 Aviation, Radar and Military and the Applicant’s responses in **Table 16.1-1**.
- 2. The Applicant previously submitted a Scoping Report in 2023 based on project parameters at that time. The 2024 Scoping Report (Royal HaskoningDHV, 2024) and adopted Scoping Opinions (Planning Inspectorate, 2024) have superseded the 2023 Scoping Report and as such consultation responses on the 2023 Scoping Report are not considered further in this document except where they are included in the 2024 consultee responses and remain relevant to the Project.

Table 16.1-1 Consultation Responses for Aviation, Radar and Military

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
The Planning Inspectorate	Scoping Opinion (02/08/24)	The Scoping Report proposes to scope this matter out on the basis that the only operational infrastructure within the Staxton Danger Area would be a below sea cable which would not affect aviation activities. On this basis, the Inspectorate is content to scope this matter out.	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
The Planning Inspectorate	Scoping Opinion (02/08/24)	The Scoping Report seeks to scope out impacts on military and civil radar, across all phases of the development, on the basis that Radar Line of Sight (RLoS) modelling suggests that completed wind turbines will not be visible to radar as they will be a minimum of 210km from shore. Onshore elements of the Proposed Development with the potential to impact on radar are also stated to be outside of the EUR Doc 015 recommended safeguarded zone. The Inspectorate agrees that this matter can be scoped out of further assessment.	Noted.
The Planning Inspectorate	Scoping Opinion (02/08/24)	The Scoping Report seeks to scope out impacts on radio navigation aids across all phases of the development, on the basis that, whilst infrastructure within the Onshore Scoping Area has the potential to cause interference to the National Air Traffic Services (NATS) Ottringham VOR/DME, it is outside of the EUR Doc 015 recommended safeguarded zone for VOR/DME facilities. On this basis, the Inspectorate is content to scope this matter out.	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
The Planning Inspectorate	Scoping Opinion (02/08/24)	The Scoping Report states that the assessment will be supported by further desk-based studies alongside consultations with relevant stakeholders. However, no criteria have been provided to define the significance of effects. The Environmental Statement (ES) should provide clarity on how the assessment has been undertaken, taking account relevant guidance and aspect specific methodology, and detail the methodology used.	Criteria to define the significance of effects are detailed in Section 16.5.3 and Table 16-7 in Volume 1, Chapter 16 Aviation, Radar and Military .
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	<p>The Environmental Impact Assessment (EIA) scoping report addresses both onshore and offshore elements and identifies subject areas that are to be addressed through the consenting process. The EIA Scoping Report acknowledges some of the principal defence issues relevant to Ministry of Defence (MOD) consideration of the proposed development.</p> <p>I write to confirm the safeguarding position of the MOD on information that should be provided in the Environmental Statement to support any application.</p>	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	<p>Impact on military activity has been recognised in Chapter 7.10 Aviation, Radar and Military, specifically within section 7.10.2.2. At paragraph 797, the developer has identified that the proposed export cable route would pass through Danger Area D412 (Staxton). This danger area extends from surface to 10,000ft amsl and is used for ordnance, munitions, and explosives. The MOD has concerns that development within this area may impact on Defence activities and operations and as such must be consulted at future application stages.</p> <p>Paragraph 798 acknowledges that parts of the development are proposed beneath Danger Area D323. D323 extends from Flight Level 50 (approx. 5000ft amsl) up to Flight Level 660 (approx. 66,000ft amsl) and activity within this area may include high energy manoeuvres, ordnance, munition and explosives, electrical/optical hazards, and unmanned aircraft systems operating beyond visual line of sight. The MOD would be concerned where development exceeds a height of 1000ft amsl (307.8m). The maximum blade tip height proposed is approximately 1213.9ft amsl (370m) and as such the MOD has concerns that development within this area may impact on Defence activities and operations and as such must be consulted at future application stages.</p> <p>Paragraph 800 identifies that parts of the development are proposed beneath Area 07, an air-to-air refueling area which extends from Flight Level 100 (approx. 10,000ft amsl) up to Flight Level 290 (approx. 29,000ft amsl). The MOD has identified no concerns with regard to any impact of the development on Area 07.</p>	<p>Potential impacts on Staxton Danger Area D412 are considered in Section 16.7 in Volume 1, Chapter 16 Aviation, Radar and Military.</p> <p>Only the offshore export cable corridor is within Danger Area D323. Surface Piercing structures are only proposed within the DBD Array Area which is beyond D323 and therefore there would be no impact on defence activities. Further engagement will be sought with MOD to clarify this matter.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	<p>Section 7.10.1 makes reference to the MOD radars, at paragraph 783 the report states that, in general, Primary Surveillance Radars (PSR) are installed on civil and military airfields and have an operational range of between 40 nautical miles (nm) and 60nm.</p> <p>The potential impacts of wind turbine development on the operation and capability of radar systems are set out in section 7.10.3 of the Scoping Report. Paragraphs 806 and 815 identify that, given the location of the development, impacts on the military radars are scoped out of the Environmental Impact Assessment. MOD has no objection to this conclusion.</p>	Noted.
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	<p>Paragraph 786 identifies that Air Defence (AD) radars are required to provide coverage at ranges in excess of 60nm. The report states that RLoS modelling undertaken for the project indicates that wind turbines and other tall obstacles within the Dogger Bank D array area would not be visible to any AD radars. Following assessment, the MOD agrees with this conclusion.</p>	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	<p>The potential for the development to create physical obstructions to military low flying aircraft activities is acknowledged within Chapter 7.10 Aviation, Radar and Military, Paragraph 7.10.3.2.3 (817 and 818). To mitigate any potential impact, it is common practice that the MOD will request that a Requirement is added to any Development Consent Order that might be issued requiring the submission of information such as commencement dates, maximum turbine heights and the longitude and latitude of each wind turbine. This information is required to allow accurate charting of the development.</p> <p>Table 7-30 acknowledges lighting of offshore developments requirements to be scoped in. The MOD agrees with this conclusion.</p>	The Project will commit to statutory notification, marking and lighting of offshore infrastructure as embedded mitigation measures, as detailed in Table 16-3 in Volume 1, Chapter 16 Aviation, Radar and Military.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	The potential for unexploded ordnance (UXO) to be present within the development area and the necessity for clearance should be considered. The potential presence of UXO and disposal sites should be a consideration during the installation and decommissioning of turbines, cables, and any other infrastructure, or where other intrusive works are necessary.	A detailed UXO survey would be completed prior to construction. A separate Marine Licence application would be made prior to construction for UXO investigation and clearance works.
Defence Infrastructure Organisation	Scoping Opinion (02/08/24)	MOD have identified no concerns with regard to the onshore element of the proposed development.	Noted.
NATS	Scoping Opinion (02/08/24)	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.	Noted.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the Preliminary Environmental Information Report (PEIR)
Met Office	Email correspondence (03/01/25)	<p>We don't have any concerns about the infrastructure on land, the only impacts would be if the turbines are in the radar beam. However, in this case the base of the radar beam is considerably above that of any potential turbine so there will no impacts on our radar data or services derived from it.</p> <p>Hence we have no concerns.</p>	The DBD Array Area is outside all Met Office meteorological radar consultation zones, as noted in Table 16-1 in Volume 1, Chapter 16 Aviation, Radar and Military .

References

Royal HaskoningDHV (2024). Dogger Bank D Scoping Report (Part 1 & 2). Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000069-EN010144%20-%20Scoping%20Report%20-%20Part%201.pdf> & <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000070-EN010144%20-%20Scoping%20Report%20-%20Part%202.pdf> [Accessed September 2024].

The Planning Inspectorate (2024). Scoping Opinion adopted by the Secretary of State on 02 August 2024. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000071-EN010144%20-%20Scoping%20Opinion.pdf> [Accessed September 2024].

List of Acronyms

Acronym	Definition
AD	Air Defence
DBD	Dogger Bank D
EIA	Environmental Impact Assessment
ES	Environmental Statement
MoD	Ministry of Defence
NATS	National Air Traffic Services
PEIR	Preliminary Environmental Information Report
PSR	Primary Surveillance Radars
RLoS	Radar line of Sight
UXO	Unexploded Ordnance