

Your Reference: Neart Na Gaoithe

Offshore Windfarm

Our Reference: DIO10040201

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Alan Keir Marine Renewables Casework Officer Marine Scotland

20th August 2018

Dear Mr Keir,

Application for consent under Section 36 of the Electricity Act 1989 (as amended) and Marine Licence under Part 4 of the Marine (Scotland) Act 2010 to construct and operate Neart Na Gaoithe Offshore Windfarm (revised design), 15.5km East of Fife Ness

I write in relation to the above development, to update you of the Ministry of Defence's (MOD) revised position.

The MOD has objected to the proposed development in the letters to Marine Scotland dated 16<sup>th</sup> May 2018 and 30<sup>th</sup> July 2018. The MOD objected on the basis that the proposed development would cause unacceptable interference to the Air Traffic Control (ATC) radar at Leuchars Airfield, and the Air Defence radars at Remote Radar Head (RRH) Brizlee Wood and RRH Buchan.

The MOD's revised position is as follows;

## ATC radar at Leuchars Airfield

The turbines will be approximately 34.7 km from, detectable by, and will cause unacceptable interference to the ATC radar used by Leuchars Airfield. The MOD maintains this objection.

The MOD objected to the previous application for this development in 2013. The MOD worked with the applicant to agree technical mitigation for the purposes of agreeing to a suspensive planning condition. Marine Scotland previously imposed this condition on the consent, granted in 2014. To be pragmatic, the MOD is prepared to agree to the use of the planning condition utilising the previous technical mitigation proposal as the contents remain extant. The MOD respectfully requests the inclusion of the following condition on any forthcoming consent;

No development shall commence unless and until an Air Traffic Control Radar Mitigation Scheme to address the impact of the wind turbines upon air safety has been submitted to and approved in writing by Scottish Ministers.

The Air Traffic Control Radar Mitigation Scheme is a scheme designed to mitigate the impact of the development upon the operation of the Primary Surveillance Radar at Leuchars Airfield ("the Radar") and the air traffic control operations of the Ministry of Defence (MOD) which is reliant upon the Radar. The Air Traffic Control Radar Mitigation Scheme shall set out the appropriate measures to be implemented to mitigate the impact of the development on the Radar and shall be in place for the operational life of the development provided the Radar remains in operation.

No turbines shall become operational unless and until all those measures required by the approved Air Traffic Control Radar Mitigation Scheme to be implemented prior to the operation of the turbines have been implemented and Scottish Ministers has confirmed this in writing. The development shall thereafter be operated fully in accordance with the approved Air Traffic Control Radar Mitigation Scheme.

## Air Defence radar at RRH Brizlee Wood

In the letters of 16<sup>th</sup> May and 30<sup>th</sup> July 2018, the MOD objected on the grounds that the proposed development would be detected by and would cause unacceptable interference to the Air Defence radar at RRH Brizlee Wood.

Following the submission of these objections, and through dialogue with the applicant, the MOD has undertaken a further assessment of the radar coverage from RRH Brizlee Wood in the vicinity of the proposed development. This assessment shows that the coverage is limited in this area, and as such the proposed turbines at 208 metres in height are unlikely to be detected by the Brizlee Wood Air Defence radar.

To conclude, the MOD wishes to remove its outstanding RRH Brizlee Wood Air Defence radar objection.

## Air Defence radar at RRH Buchan

The MOD has recently identified that in certain conditions the performance of air defence radars may be adversely affected by the proposed wind farm when it is operational. Based upon the technical evidence currently available the MOD does not identify a need for any form of mitigatory measures to address this potential issue to be implemented in relation to the scheme for which consent is currently sought.

To confirm, the MOD wishes to remove its outstanding RRH Buchan Air Defence radar objection.

I trust that the above is acceptable. Should you wish to discuss matters then please do not hesitate to contact me.

Yours sincerely

Lucy Hodgetts BSc (Hons) MA MRTPI Senior Safeguarding Officer