



Defence  
Infrastructure  
Organisation

Assistant Safeguarding Manager  
Safeguarding Department  
St George's House  
DIO Headquarters  
DMS Whittington  
Lichfield  
Staffordshire

Your Reference: **ECU00004700**

Tel: [REDACTED]

Our Reference: **DIO 10057147**

Email: [REDACTED]

[REDACTED]  
Energy Consents Unit  
The Scottish Government  
4th Floor  
5 Atlantic Quay  
150 Broomielaw  
Scotland  
G2 8LU

06 January 2022

**By email only**

Dear [REDACTED]

Application reference: **ECU00004700**  
Site Name: **Drummond Wind Farm**  
Proposal: **Request For Scoping Opinion For Proposed Section 36 Application For Drummond Wind Farm**  
Site address: **Approximately 2.8 km east of the village of Lochearnhead**

Thank you for consulting the Ministry of Defence (MOD) in relation to the planning application through your communication dated 08 December 2022.

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, and technical sites or training resources such as the Military Low Flying System.

I am writing to tell you that, **subject to the conditions detailed in Appendix A**, the MOD has no objection to the proposed development.

The application concerns a development of 14 turbines with maximum blade tip heights of 180.00 metres above ground level (agl). The development has been assessed using the location data (Grid References) below as provided by the EIA Scoping Report dated December 2022.

Turbine no.	Easting	Northing
1	264821	730570
2	264827	730081
3	265192	729621
4	265996	729568
5	265972	729061
6	266700	729318
7	266664	730183
8	266688	728824
9	266596	728341
10	267573	729255
11	267503	728756
12	267348	728135
13	268149	727637
14	269095	727069

The principal safeguarding concerns of the MOD with respect to this development of wind turbines relates to their potential to create a physical obstruction to air traffic movements.

### **Physical Obstruction**

In this case the development falls within Low Flying Area 14 (LFA 14), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of a turbine in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD require conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

The development proposed includes wind turbine generators and/or meteorological mast(s) that exceed a height of 150m agl and are therefore subject to the lighting requirements set out in the Air Navigation Order 2016. In addition to CAA requirements, the MOD will require the submission, approval, and implementation of an aviation safety lighting specification that details the installation of MOD accredited aviation safety lighting.

### **Summary**

Subject to the two conditions requested above and provided in Appendix A, the MOD has no objections to the development.

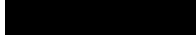
The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's document titled "EIA Scoping Report" dated December 2022. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely,

  
Assistant Safeguarding Manager

## Appendix A

### Condition - Aviation Lighting

Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 15.2 metres or more in height (above ground level) the undertaker must submit an aviation lighting scheme for the approval of the Energy Consents Unit in conjunction with the Civil Aviation Authority and the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as required under the Air Navigation Order 2016 determined necessary for aviation safety by the Civil Aviation Authority.

This should set out:

- a) details of any construction equipment and temporal structures with a total height of 15.2 metres or greater (above ground level) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
- b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

#### Reason for condition.

To maintain aviation safety.

### Condition - Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of wind turbine generators;
- b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
- c) the date any wind turbine generators are brought into use;
- d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

#### Reason for condition.

To maintain aviation safety.