

From: DIO ODC-IPS SG2a
Sent: 20 October 2014 10:05
To:
Subject: RE: Hill of Lychrobbie wind turbines

As your project is a planning application currently under consideration, it would have been considered as part of the Lossiemouth review and, as we have not withdrawn our objection, it can be safely concluded a decision was taken to the effect that it would have an unacceptable impact on operations.

As I have said, the impact from existing turbines was considered as a totality. The reviewers would not have been interested in identifying which returns came from which development.

Kind regards

Safeguarding Officer - Infrastructure Professional Services -
Safeguarding
DIO Operations Development and Coherence
**Defence
Infrastructure
Organisation**

Telephone: | **MOD Telephone:** | **Fax:**
Email:
Website: www.gov.uk/mod-safeguarding

From:
Sent: 17 October 2014 16:18
To: DIO ODC-IPS SG2a
Cc:
Subject: Re: Hill of Lychrobbie wind turbines

I asked about Houstry / Buolfruch because I thought the SME review was focusing on the baseline operational situation, from which conclusions could be drawn about developments in planning. If, as you state in your email, the review was actually focused on developments in planning to which you had / have outstanding objections then presumably the SMEs should have assessed our project as part of their review?

Your point about Houstry / Buolfruch not being specifically identified or assessed during the review is noted, but you must be able to say whether Houstry / Buolfruch was included within, or separate from, the 'area of multiple primary radar returns that was constantly changing shape and size in the vicinity of the Burn of Whilk development'.

Regards

Wind Harvest Limited

25/06/2015

On 17 Oct 2014, at 14:38, DIO ODC-IPS SG2a

I have a partial response for you. The review referred to in the analysis of Burn of Whilk only included developments still in the planning process to which we have outstanding objections. As the Houstry/Buolfruch developments are constructed, they would not have been included in the review. Obviously, while reviewing the potential impact of developments in the planning process, observations would have been made of existing developments. This is why our ADATS SME was able to make specific observations about an area of returns *in the vicinity* of the Burn of Whilk development. However, the impact of returns from existing turbines in the area of coverage would have been considered as a totality, without reference to which return might have been generated by which development. There are, therefore, no conclusions regarding the specific impact of the Houstry/Buolfruch development arising from the review.

I am afraid that I do not yet have a response from the RAF regarding your mitigation proposals. I will advise you as soon as this is forthcoming.

Kind regards

Safeguarding Officer - Infrastructure Professional Services -

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Telephone:

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Email:

Website: www.gov.uk/mod-safeguarding

From:

Sent: 15 October 2014 15:58

To: DIO ODC-IPS SG2a

Cc:

Subject: Re: Hill of Lychrobbie wind turbines

Sorry to keep pressing you but would you mind confirming what's happening at your end - are you waiting for an internal response and if so how long do you expect that to take?

regards

Wind Harvest Limited

25/06/2015

On 13 Oct 2014, at 12:38, wrote:

Any update from the SMEs?

Regards

Wind Harvest Limited

Wind Harvest Limited

On 19 Sep 2014, at 09:56, DIO ODC-IPS SG2a wrote:

I confirm receipt of your email.

This has been passed to our RAF ATC Subject Matter Experts for comment. I will get back to you as soon as I have their response.

Kind regards

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Telephone: | MOD Telephone: | Fax:
Email:
Website: www.gov.uk/mod-safeguarding

25/06/2015

From:
Sent: 18 September 2014 16:43
To: DIO ODC-IPS SG2a {
Cc: :
Subject: Re: Hill of Lychrobbie wind turbines

Thanks for the response.

I understand that the review of RAF Lossiemouth by 1 Gp Safeguarding SMEs in May 14 identified issues with the operational turbines in the vicinity of the Burn of Whilk development, which is currently under construction. It seems to us that the operational impact of the Housty / Buolfruch turbines, about 3km north of Lychrobbie, is equally if not more relevant to our project. Given that the SMEs presumably assessed Housty / Buolfruch during their review of RAF Lossiemouth, we'd appreciate a summary of their conclusions.

The attached plan shows our understanding of the local situation for reference (Burn of Whilk in red, operational turbines in blue, Hill of Lychrobbie in yellow).

The other follow up question I had was whether mitigating the detectability of the Hill of Lychrobbie project could be possible and might address operational concerns. We may be able to line up the turbines for example so they 'hide' behind each other when viewed from the radar, or drop from 3 to 2 turbines if that made a difference to the returns / interference.

You can tell we're trying to explore all avenues as the community is really relying on this project going ahead in some form. I'd appreciate if you could make sure this is factored into the overall decision on acceptability.

Regards

<image001.jpg>

Wind Harvest Limited

On 17 Sep 2014, at 11:49, DIO ODC-IPS SG2a wrote:

Thank you for your email,

1. The level 3 assessment was undertaken in response to your suggestion that intervening buildings might provide shielding. The buildings have been taken into account.
2. Your email of 11 June 2014 specifically asked for observations on the impact of the Burn of Whilk development and not the Housty/Buolfruch development.
3. Our objection was raised as a result of an assessment of the operational impact of the

25/06/2015

Our decision to withdraw our objection to Upper Smerral was based on the fact that in 2010 detectability was deemed to be manageable from an operational perspective. Please see my email of 22/04/14

Kind regards

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Telephone: | **MOD Telephone:** | **Fax:**
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From:
Sent: 15 September 2014 15:20
To: DIO ODC-IPS SG2a
Subject: Re: Hill of Lychrobbie wind turbines

Thanks for the prompt reply. I've asked [redacted] to review the information you have provided and hope to be able to revert this week with his questions / observations.

I do have some immediate questions from my own reading of the documents:

1. Does the Level 3 assessment take account of buildings / obstacles in the immediate vicinity of the radar, as this was one of the factors raised in the Spaven report.
2. Did the May 14 review of Lossiemouth identify any issues with the Houstry / Buolfruch development to the north of our proposed turbines - this seems more relevant to our proposal than issues with the Burn of Whilk area.
3. Section 5 of the Lychrobbie Level 2 assessment recommends that Ops Staff check whether Lychrobbie is in an area of vital air traffic operations controlled by Lossiemouth. We don't have any information on this from you at this stage, was a formal assessment of this made?

In terms of your question re my statement on the relative detectability of Upper Smerral and Lychrobbie, this was based on the fact that Upper Smerral proposed more turbines than Lychrobbie (4 versus 3), at a higher tip height (84m versus 74m) and a greater altitude (166-187m AOD versus 140-146m AOD). The difference in distance (Upper Smerral is ~1.5km further from the radar) and bearing (~1 degree) seem relatively trivial compared to those larger physical differences. Does this relative detectability have a bearing on your objection to Lychrobbie?

Regards

Wind Harvest Limited

On 12 Sep 2014, at 11:05, DIO ODC-IPS SG2a wrote:

25/06/2015

Please find attached a redacted version of the Level 2 report for Hill of Lychrobbie. A Level 3 report has been carried out. Our Level 3 reports are carried out using a spreadsheet calculation tool. The tool cannot be release as it includes classified information. The calculation has concluded that the turbines are around 6 dBA above the detection threshold of the Watchman. This is a significant amount.

I also attach an operational impact assessment for the turbines at Burn of Whik.

You state you know that the Hill of Lychrobbie turbines would be less detectable than the turbines at Upper Smarral would have been. Please provide details of the calculations used to come to this conclusion.

I believe that you have been provided with Level 1 and Level 2 assessments that you requested relating to other developments in the vicinity.

With regard to your request to visit RAF Lossiemouth to discuss operation matters with Air Traffic Control staff there. I can advise that a visit to RAF Lossiemouth is neither relevant or appropriate as the operational staff at the Station do not assess the wind turbine applications. It is the Defence Infrastructure Organisation that administers the wind farm assessment process and we have a team of technical advisors within the MOD including a wind farm team within the RAF who are responsible for carrying out the assessments. If you wish to come to Sutton Coldfield and discuss the matter with them here, that could be arranged. Please provide dates when you would be available.

Kind regards

| Safeguarding Officer - Infrastructure Professional Services -

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Telephone: | MOD Telephone: | Fax:

Website: www.gov.uk/mod-safeguarding

From:
Sent: 05 September 2014 09:27
To: DIO GDC-IPS SG2a
Cc:
Subject: Re: Hill of Lychrobbie wind turbines FAO.

its over a week since I sent the emails below and I haven't had a response. Could you confirm to you've received my requests.

20:06:20:15

Wind Harvest Limited

On 27 Aug 2014, at 18:39, _____ wrote:

One point to add to my previous email - the DIO letter of 28 July states that you have a Level 2 assessment for Hill of Lychrobbie. I would appreciate if you could provide the Level 2 assessment report to us now, followed by the Level 3 assessment when this is completed.

Regards

Wind Harvest Limited

On 27 Aug 2014, at 16:52, _____ wrote:

I refer to my emails of 11th June 2014 and 1st July 2014 requesting a Level 3 assessment for Hill of Lychrobbie. Can you confirm when this will be available? We know that the Hill of Lychrobbie turbines are less visible than Upper Smerral, and hence must be borderline detectable at best, so you can understand why we are keen for DE to undertake the more detailed analysis.

I refer to your email of 1st July stating that you have passed our request for a meeting with Lossiemouth ATC staff to the RAF. Have you had any response? If the Level 3 assessment shows some degree of visibility, we would hope that the associated operational impact could be properly assessed through discussion with Lossiemouth directly.

It would be useful to have the Level 3 results during September as we expect the application to be taken to the October planning committee. The MoD is the only objector to the project, which has significant local and political support. I'm sure you would agree that it would be preferable if the MoD presented a fully considered position to the council on this important community project.

It may also be worth noting that Upper Smerral was refused and not appealed, while the subsequent Newlands of Houstry project on the same site was refused and has just passed its deadline for appeal, so cumulative impacts should not be a factor.

Regards

Wind Harvest Limited

On 1 Jul 2014, at 17:03,

wrote:

Thanks for the quick response. Clearly, given the discussion we are having we need to see the results of a Level 3 assessment for Lychrobbie, if that has not already been done. We still consider that it is important for us to see the Level 1 Or 2 (as appropriate) assessments which were done for the other projects nearby - Upper Smerral, Lower Rumster, Upper Clyth and Burn of Whilk - and I would be grateful if you could forward those as well. Hegarty's On 1 Jul 2014, at 14:02, DIO ODC-IPSSG2a wrote:

My email of 22/04/14 did not state that we had carried out a level 3 assessment of impact of The Hill of Lychrobbie development on the Lossiemouth radar. It simply stated our radar expert had concluded that the buildings would not provide shielding. I have asked him to confirm the assessment method that he used to arrive at this conclusion.

My email also made no mention of level 3 assessments for Upper Smerral, Lower Rumster, Upper Clyth or Burn of Whilk. Decisions for all of these developments were made on the basis of Level 1 or Level 2 assessment.

We do not hold a copy of the RAF's operational assessment for Burn of Whilk on file.

I will pass your request for a site visit on to the RAF.

Kind regards

| Safeguarding Officer - Infrastructure Professional Services -

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Telephone: | MOD Telephone | Fax:
Email: _____
Website: www.gov.uk/mod-safeguarding

Please respond to the email below.

Regards

Begin forwarded message:

From:
Subject: **Hill of Lychrobbie wind turbines FAO:**
Date: 19 June 2014 17:12:12 GMT+01:00
To: DIOODC-IPSSG2a

Cc: [redacted]

Thank you for your response of 22nd April 2014 re our community wind cluster at Hill of Lychrobbie.

Please forward a copy of the ADATS Level 3 assessment of the Lychrobbie turbines so that we can assess your conclusion re lack of shielding.

We also require copies of the other Level 3 assessments for the projects in the vicinity of Lychrobbie (i.e. Upper Smerral (at 84m), Lower Rumster, Upper Clyth, Burn of Whilk) to check consistency with your assessment of Lychrobbie.

Further, we also require a copy of the HQ Air Command operational assessment for Burn of Whilk. I believe Burn of Whilk is currently under construction but if it is in fact operational, is the experience of the radar operators that it is now operationally acceptable?

Once we have reviewed this information we may need to visit RAF Lossiemouth to discuss operational matters with ATC staff there. I'm sure you wouldn't object to this direct approach, given how useful it would be and the fact that Defence Estates does not have the manpower to undertake such visits itself.

It may also be relevant that the Newlands of Houstry project (which replaced the refused Upper Smerral project) has now itself been refused.

Regards

Wind Harvest Limited

T: [redacted]
M: [redacted]
www.windharvest.co.uk

<20140912 ADATS report redacted.doc><20140912 Burn of Whilk assessment.doc>

25/06/2015