



Giant's Burn Aviation Lighting and Mitigation Technical Appendix V2.0

Our Reference: WPAC 041/25 Your Reference: Giant's Burn EIA

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Reference Documents

A. Civil Aviation Publication (CAP) 764 Civil Aviation Authority (CAA) Policy and Guidance on Wind Turbines Version 6, Feb 2016

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- B. CAP 764 Version 7 (Draft) issued for comment in June 2020
- C. CAP 764 Version 7 (Draft) issued for comment in April 2024
- D. Air Navigation Order (ANO) Article 222
- E. CAA Policy Statement: Lighting of Onshore Wind Turbine Generators in the United Kingdom with a maximum blade tip height at or in excess of 150m Above Ground Level dated 01/06/17
- F. International Civil Aviation Organisation (ICAO) Annex 14 Vol 1 Chapter 6
- G. MOD Obstruction Lighting Guidance Document 01 Jan 2020
- H. Landscape Institute Guidance on Landscape and Visual Impact Assessment Version 3
- I. NatureScot Guidance on Aviation Lighting Impact Assessment dated November 2024

Scope

1. This report is divided into two parts. Part 1 proposes a lighting design that is compliant with existing and draft (but soon to be ratified) regulations and guidance contained within References A to G as discussed with the CAA and the MOD. It explains the rationale behind the lighting design taking into account the requirement to minimise the number of turbines illuminated with aviation obstruction lights whilst maintaining flight safety. The report also provides a detailed assessment of the brilliance of the lighting when viewed from a number of viewpoints provided by the LVIA consultant after consultation with the relevant stakeholders including NatureScot and the Local Planning Authority. Part 2 of the report identifies and explains those mitigation measures that can be utilised to minimise the environmental effect of the lights including an assessment of the historical meteorological data from which to predict the luminous intensity requirements for the lights. The entire report can be considered to fulfil the requirements for an Aviation Lighting Landscape and Visual Impact Mitigation Plan and can be used to inform the Landscape and Visual Impact Assessment as recommended in the guidance laid down in the Landscape Institutes Guidelines for Visual Impact Assessment Version 3 (GLVIA3).

Part 1 Turbine Lighting Layout Design

Introduction

2. WPAC have designed a large number of CAA and MOD compliant lighting layouts for wind farms and are also in constant dialogue with the CAA regarding the proposed changes to CAP 764 in terms of aviation lighting requirements. Whilst Reference A is technically the current publication for policy and guidance on this issue, Reference B was released for comment and is already being used by the CAA as the current de facto policy. Reference C is also currently out for consultation with all aviation stakeholders but the proposed release date has passed and the CAA have yet to publish a new release date. Discussions with the CAA have clarified that the draft regulations at Reference B will not be changing in terms of the overarching policy but the wording may be slightly amended in the interests of clarity.

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Lighting Layout Starting Point and Assumptions

3. The Applicant is proposing a 7 turbine wind farm to the west of Dunoon on the west bank of the Firth of Clyde. Giants Burn is within MOD Low Flying Area (LFA) 14, the largest and busiest LFA in the UK. At night this area converts to Night Allocated Region (NAR) 1A, an area primarily reserved for fast jet low flying in the hours of darkness. Nonetheless, it is also in regular use by Army, Navy and RAF helicopters.

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4. Conversely, the hilly and built up nature of this part of the central region dictates that this is not an active civilian/commercial area for fixed wing aircraft in the lower airspace at night but is an active helicopter operating region. Emergency helicopters operating in the area at night will include: Police, HEMS, Ambulance, Coast Guard and various military formations operating down to ground level on occasion. Due to the possibility of MOD and civilian helicopters operating in the immediate airspace around the turbines the site will require a comprehensive obstruction lighting arrangement that includes both visible and infra-red obstruction lights to meet CAA and MOD criteria.

Lighting Assessment Overview

- 5. From a CAA perspective Giants Burn is sited outside controlled airspace and some distance from airports and airfields .It is over 35km to the west of Glasgow Airport and 10km to the west of the boundary of the Glasgow Control Zone and Scottish Terminal Area (TMA). It is located within Class G unregulated airspace that extends upwards to 5500ft above mean sea level (AMSL) As a result, the requirement for aviation lighting will be assessed in accordance with the requirements within Class G 'en-route' airspace requirements as detailed in CAP 764 (latest draft).
 - To accommodate MOD requirements the site will be assessed for NVG compatible lighting in accordance with MOD published obstruction lighting specifications.
 - Where possible the recommended final lighting configuration will be optimised to reduce light impact on the local area.
 - CAA obstruction lighting dispensations that are currently offered where flight safety can be maintained will be included.
 - The Giant's Burn proposed development is for 7 turbines at 180m and 200m to tip.

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•1011₁ 1145• 509 1503 • 2005 Legend Giant's Burn Turbines VFR 250k Chart Extract Statkraft Data included in this report reproduce under licence from NATS Ltd. ©2025 NATS Ltd. All rights reserved. Digital Terrain Model OS50

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Figure 1 Giant's Burn on an aviation chart

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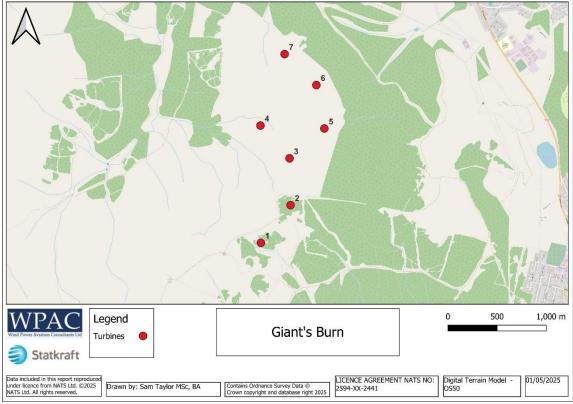


Figure 2 Giant's Burn



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CAA-ANO Red 2000/200cd Lighting (In compliance with CAA CAP 764 - Draft)

- 6. In accordance with the CAP 764 (draft) conditions, the CAA requires:
 - That all perimeter turbines be lit unless removing a light will leave a gap of less than 900m total between the remaining lit turbines.

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- That any turbine within 200m of a 'string perimeter' be lit unless the distance between adjacent turbines is less than 900m total. NB: additional spacing dispensation is sometimes available for the above criteria.
- That any unlit turbine does not exceed a 10° up-slope from adjacent lit turbines.
- No turbine shall be more than 1800m (1nm) from a lit turbine.
- 7. Applying these criteria dictates that all 7 turbines of the Giant's Burn site would require ANO visible red lighting.

Turbines with 2000/200cd Lights: T1, T2, T3, T4, T5, T6 and T7.

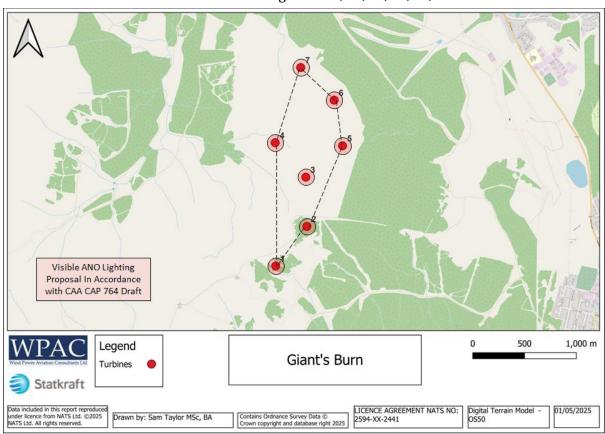


Figure 3 Lighting Layout without CAA Dispensations



CAA-ANO Red 2000/200cd Reduced Lighting Proposal

8. The military have operated at low level at night for many decades now using night vision equipment. In more recent times, the last decade or so, more civilian operators have moved to night low level using suitable night vision equipment: night vision goggles (NVGs) etc. Such civilian operators include Coast Guard Search and Rescue (CSAR), Police, Helicopter Emergency Medical Services (HEMS) and Air Ambulance.

- 9. Although, in the past, some night operators would fly at night at low level without night equipment (on carefully pre-planned exercises pre-flown by day) such events have been overtaken by the ever-widening use of night vision equipment. As a result, operators who now night fly without night vision equipment will fly at or above 'safety altitude' when not under the guidance of Air Traffic Control.
- 10. Aircraft operating safety altitude depends upon the protocol adopted or phase of flight, the safety altitude used will be 1000ft (300m), 1500ft (450m) or 2000ft (600m) above the local terrain/highest obstacle, this includes the turbine tip heights. Aircraft/helicopters flying at or above safety altitude will only need enough visible lights to define the wind farm and its size/shape/perimeter.
- 11. Accordingly, aircraft flying above the Giant's Burn turbines at safety altitude or above and/or under ATC control will only require an outline of the Giant's Burn site. Such a requirement could be met with **three** visible red lights on turbines **T1**, **T3** and **T7**.

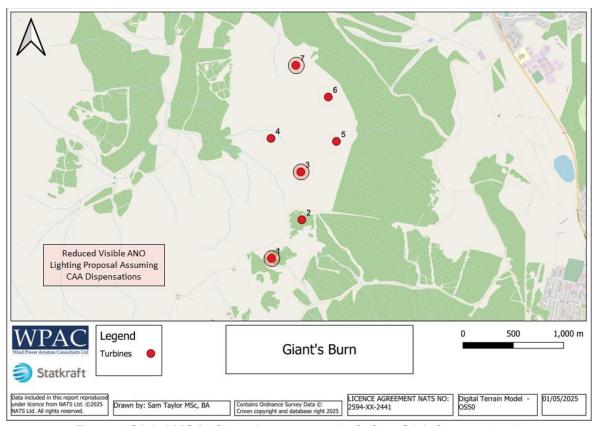


Figure 4 CAA-ANO Lighting Arrangement (including CAA dispensations).



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MOD Lighting Requirements

12. Early detection is important especially if the aircraft is manoeuvring hard and the air temperature profile causes the turbines to blend into the background. Suitable lighting is necessary for flight safety.

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13. MOD IR lights have been developed to be invisible to the public at large but very detectable to aircrew night vision aids. As such the MOD IR lights can have a wide beam width and flash continuously without disturbing the visible environment.

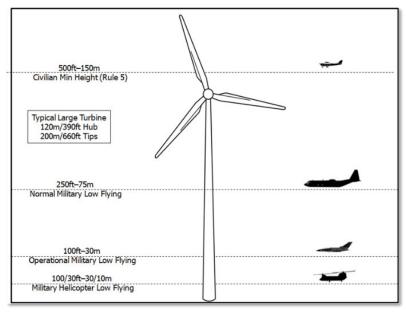


Figure 5 Wind turbine in context with MOD Low Flying

MOD Infrared Lighting Layout

- 14. The MOD requires:
 - That all 'compound-perimeter' turbines (see blue dotted line on Figure 6) be lit unless removing a light will leave a gap of less than 500m between the remaining perimeter lit turbines. Note: at this site, the CAA string and MOD compound perimeters are notably different.
 - That any dominant turbine, by location or height, be lit. Note: here all turbines are lit.
 - Giant's Burn does not meet the MOD small site criteria (red dotted circle on Figure 6). Accordingly, central (non-perimeter) turbines will require lighting.
- 15. Applying these criteria dictates that all 7 turbines of the Giant's Burn site will require IR lighting.

Turbines with IR Lighting: T1, T2, T3, T4, T5, T6 and T7.



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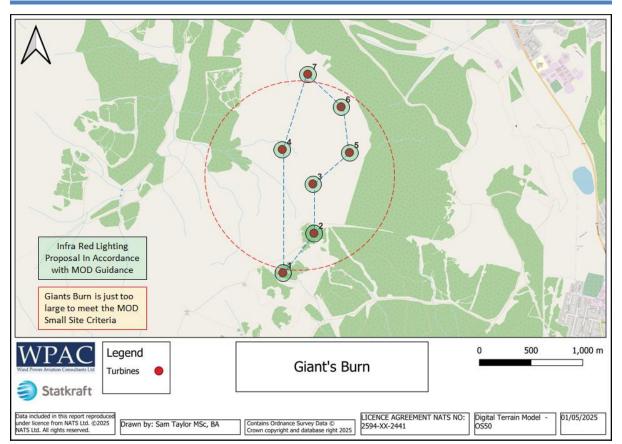


Figure 6 Proposed MOD Infrared Lighting Arrangement

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Combined CAA Visible Lighting and MOD Infrared Lighting

	Giants Burn Turbine Lighting Table												
Turbine	vine Easting Northing		Tip Ht Hub Ht		CAA-ANO	MOD-IR							
T1	214071	677762	200m	119m	2000/200cd	600mW/sr							
T2	214372	678144	200m	119m		600mW/sr							
T3	214362	678620	200m	119m	2000/200cd	600mW/sr							
T4	214066	678953	200m	119m		600mW/sr							
T5	214716	678923	180m	99m		600mW/sr							
Т6	214635	679364	180m	99m		600mW/sr							
Т7	214312	679679	200m	119m	2000/200cd	600mW/sr							

Table 1 CAA and MOD Lighting Arrangement

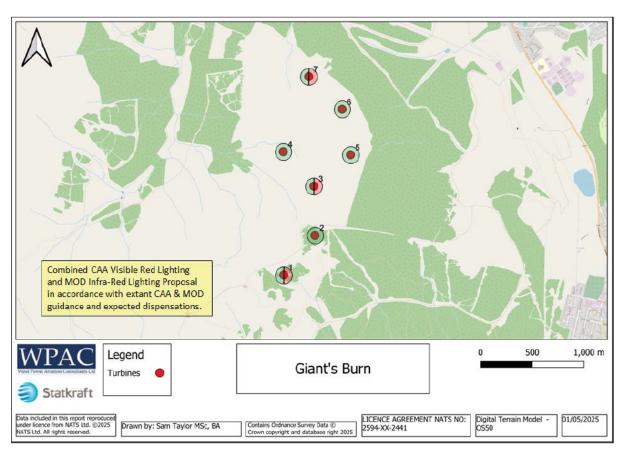


Figure 7 CAA-ANO Visible Red and MOD Infrared Lighting Arrangement



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ANO Light Specifications

16. The ANO 2000/200cd lights will conform to the ICAO specification as set out in Annex 14 Table 6-3. The lights will also be controlled such that when the met visibility is greater than 5km in all directions from all turbine hubs, the lights will be reduced to 200cd (10% of normal power). This reduction in power will not apply to MOD IR Lights.

ICAO	Annex	14	Table	6-3	(excerpt)
IUAU	Allie V	14	I able	0-0	(excelbi)

Benchmark		Minimum requirements					Recommendations				
	Vertical elevation angle (b)			Vertical beam		Vertical elevation angle (b)			Vertical beam		
	C	0	-1°	spread (c)		0°	-10	-10°	sprea	d (c)	
intensity	Minimum average intensity (a)	Minimum intensity (a)	Minimum intensity (a)	Minimum beam spread	Intensity (a)	Maximum intensity (a)	Maximum intensity (a)	Maximum intensity (a)	Maximum beam spread	beam Intensity	
2000	2000	1500	750	3°	750	2500	1125	75	N/A	NA	

a) 360° horizontal. All intensities are expressed in Candela. For flashing lights, the intensity is read into effective intensity, as determined in accordance with the Aerodrome Design Manual (Doc 9157), Part 4.

Table 2 ICAO Annex 14 Table 6-3 Medium Intensity Lighting Specifications.

- 17. <u>Low Intensity Mid Mast Lights</u> Mid mast lighting was originally intended to give an attitude/range reference (horizon indication) to pilots flying at night in the days before NVGs. Hub and mid mast lights will give a vertical reference (from which a horizontal reference can be gauged) when fitted to a single vertical structure. In contrast, a single light will not be able to give a vertical or horizontal reference or indication of range and range-rate. However, a series of single hub lights, on a group of structures, will provide a good horizon reference together with range and range-rate clues. Accordingly, the requirement for mid-masts lights is much diminished if not made redundant in the case of multiple vertical structures such as wind farms.
- 18. All of the current commercially available 32cd (supposedly focused) lights are over-engineered (up to 70cd between -30deg and +40deg) to fit a multitude of aviation and marine applications. They induce a disproportionately large environmental impact, often significantly more than the focused hub 2000/200cd lights. WPAC have proposed that the CAA guidance requirement for 32cd (Type B) mid mast lights be removed for Giant's Burn. When the CAA have agreed that intermediate lighting is not required it will be reflected in their lighting reduction concession approval letter which will be attached at Appendix C to this report and the report updated.

b) Elevation vertical angles are referenced to the horizontal when the light unit is levelled.

c) Beam spread is defined as the angle between the horizontal plane and the directions for which the intensity exceeds that mentioned in the "intensity" column.

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Table 6-2. Light di	istribution for l	low-intensity	obstacle lights
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	Minimum intensity (a) Maximum intensity (a)		Vertical beam spread (f)		
			Minimum beam spread	Intensity	
Туре А	10 cd (b)	N/A	10°	5 cd	
Туре В	32 cd (b)	N/A	10°	16 cd	
Туре С	40 cd (b)	400 cd	12° (d)	20 cd	
Type D	200 cd (c)	400 cd	N/A (e)	N/A	

Note.— This table does not include recommended horizontal beam spreads. 6.2.1.3 requires 360° coverage around an obstacle. Therefore, the number of lights needed to meet this requirement will depend on the horizontal beam spreads of each light as well as the shape of the obstacle. Thus, with narrower beam spreads, more lights will be required.

Table 3 ICAO Annex 14 Table 6-2 Low Intensity Obstacle Lights.

IR Light Specifications

19. The IR lights will conform to the MOD specification as set out in MOD Lighting Guidance and shown below in Table 4.

MOD Specification IR.

IR wavelength - 750 to 900nm.

But ideally concentrated within 800 to 850nm for optimum detection by all military NVG types.

IR intensity - 600mW/sr minimum at peak flash but not above 1200mW/sr.

(Note: Typically a 300mW/sr steady burn LED IR light will generate 600mW/sr at peak flash) This will generate a 7-8 nm NVG pick-up range - remaining above 5nm as the light ages.

Horizontal Pattern - unrestricted 360 deg.

Vertical Pattern - Minimum flash intensity of 600 mW/sr between +30 deg and -15 deg elevation.

- up to 50% reduction between +25 to +30 deg and -10 to -15 deg is acceptable.
- Maximum intensity of 1200 mW/sr for all angles of elevation.
- Vertical overspill is acceptable.

Flash Pattern - 60 flashes per min at 100-500 ms duration (ideally 250ms)

Synchronisation - all lights to be visually synchronised across a wind farm site

Table 4 MOD Specification for IR Obstacle Lights

Timings

20. The lights (IR and ANO) will be switched on between Evening Civil Twilight and Morning Civil Twilight in accordance with the UK Almanac; approximately 11 hours per day when averaged over the year.



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Assessment of Aviation Lighting and Potential Mitigation Measures Designed into the Lights

- 21. Having defined a layout of turbines to be fitted with visible lighting, an assessment has been undertaken to calculate the brilliance of the lights when seen from a number of viewpoints. The aviation obstruction lights to be fitted to the nacelle of the turbines are required to fulfil certain design criteria in terms of brilliance and coverage as per Table 2. They are designated 'medium intensity obstruction lights' and have a **minimum** luminous intensity of 2000 candela¹ at horizontal and slightly above. The LED lights are also required to be able to shine a beam that reduces in intensity above and below the horizontal. One manufacturer of such obstruction lights, CEL, have tested their light, the CEL-WT-MIC² in a calibration chamber and produced results showing precisely how much the beam reduces in brilliance at any specified elevation angle. The results are interpolated to every 0.1°. This light is a finely tuned upgrade to the previous version and has been developed specifically for onshore wind turbine lighting in order to minimise downward light intensity and is now available from the manufacturer.
- 22. Figure 8 demonstrates the reduction in luminous intensity below the horizontal and also above 1° in elevation. The various coloured lines are the candela measured from different angles in the horizontal in order to measure the performance all around the light.



¹ Candela is the SI Unit of luminous intensity and refers to the amount of light emitted in a particular direction.

² <u>CEL-WT-MIC - rev1.pdf</u>

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Figure 8 (MI GAM CEL-WT-MIC Light Measurement Results)

23. WPAC have utilised their propagation modelling system (Rview) to calculate the precise angle of elevation between the turbine light and a viewpoint assuming a height of eye of 1.5 metres and a turbine hub height of 99 and 119m as required. The system utilises a standard atmospheric model and an earth model that uses actual earth curvature between the turbine light and the viewpoint. Ordnance Survey OS50 DTM is used as the terrain model. The calculations have been undertaken for each designated lit turbine against all designated Giant's Burn viewpoints. The locations of the viewpoints are shown in Figure 9 and Table 5.



Viewpoints

Giants Burn

Drawn by: Sam Taylor MSc, BA

Statkraft

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7.5 15 km Legend

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Digital Terrain Model OS50

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Figure 9 Viewpoint Locations

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Giant's Burn

Viewpoints

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- 24. The next stage in the process is to take the candela figures radiated towards a viewpoint and taking into account the distance, calculate the lumens per square metre (also known as Lux) that will be experienced by the human eye at the viewpoint. The figure produced is in micro-lumens per square metre or lumen⁽¹⁰⁻⁶⁾/m²) or lux⁽¹⁰⁻⁶⁾. These are perfect clear-air figures and therefore worst-case results from an LVIA perspective. Figures obtained by this method enable comparisons to be made with commonly understood light sources such as stars or planets. In practice the light intensity at the observation points will be further attenuated by scatter and absorption by airborne dust, droplets and aerosols in the atmosphere. This attenuation is typically in the order of 10 to 20% but can be as high as 75% at the more distant observation ranges.
- 25. The results for every lit turbine from all of the viewpoints are shown in the results tables in Appendix A to this report. Viewpoints where lights are obstructed by terrain are shaded in green, when the viewpoint is too close to a turbine to get an accurate assessment it is shaded red. To take into account any limitations within the terrain model we have highlighted in purple any viewpoints where the line of sight is under 10 metres above ground level but above 1.5 metres and should therefore, still be screened by terrain but may be visible within the vicinity of the viewpoint.



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Viewpoint Number	Viewpoint Name	Position
1	Lazaretto Point	NS 17176 80399
2	Dunoon, Ardenslate Road	NS 17694 78193
3	Dunoon Castle	NS 17506 76380
4	Strone Pier	NS 18879 80530
5	A815, Orchard	NS 15215 82952
6	Benmore Gardens (Entrance)	NS 14210 85493
7	Glen Lean	NS 08528 83590
8	Dornoch Point	NS 14153 94642
9	Kilcreggan	NS 22903 80531
10	Three Lochs Way, The Gare Lochhead	NS 25761 90386
11	John Muir Way, Bannachra Muir	NS 34257 83450
12	Helensburgh	NS 30160 82066
13	Lyle Hill Viewpoint	NS 25626 77137
14	McInroy's Point, Gourock	NS 21892 76788
15	Lunderston Bay	NS 20438 74549
16	Inverkip	NS 20091 71887
17	Wemyss Bay	NS 18988 69758
18	Kelly Cut	NS 24187 71680
19	Great Cumbrae	NS 16790 57013
20	Rothesay	NS 08670 64850
21	Ardmore Point	NS 31323 78801
22	Benmore Gardens (Hilltop Viewpoint)	NS 13669 85614
23	Strone Hill	NS 18365 82190
24	Beinn Mhor	NS 10775 90827

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Table 5 Viewpoints

Interpreting the Results

26. The results show that there is a significant decrease in the luminous intensity (candela) of the light emanating towards those viewpoints which are at lower angles of elevation in relation to the turbine hub. However, when considering the perception of the light from a viewpoint, the distance between the light and the viewpoint is also a significant factor and the resultant figure in micro-lux is the most relevant figure to consider. This report provides the results and anticipates that the Landscape and Visual Impact Assessment (LVIA) consultants will be able to put them into the correct context for visualisations in terms of background environmental lighting and atmospheric conditions. Table 6 shows the turbine with the greatest potential perceived luminous intensity expressed in micro-lumens per m² (Lux (10-6)) at each viewpoint.

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Viewpoint	Turbine	Distance (KM)	Microlumens per m2 (lux10-6)	Microlumens at 10%	Obscured
1	7	2.95	8.6	0.9	
2	3	3.36	6.7	0.7	
3	1	3.7	5.5	0.6	
4	7	4.65	4.3	0.4	
5	7	3.4	6.1	0.6	
6	7	5.82	4.0	0.4	
7	3	7.66	4.2	0.4	
8	7	14.96	2.9	0.3	
9	7	8.63	3.3	0.3	
10	3	16.38	3.9	0.4	
11	7	20.3	3.8	0.4	
12	7	16.03	2.5	0.3	
13	7	11.6	4.8	0.5	
14	7	8.11	3.3	0.3	
15	7	7.99	3.4	0.3	
16	7	9.7	3.2	0.3	
17	7	10.97	3.1	0.3	
18	7	12.71	5.9	0.6	
19	7	22.8	2.5	0.3	
20	3	14.9	2.0	0.2	
21	7	17.03	2.4	0.2	
22	7	5.97	5.5	0.6	
23	7	4.77	78.8	7.9	M
24	3	12.72	12.4	1.2	

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Table 6 Brightest Turbine Hub Light from each Viewpoint (measured in micro-lumens)

27. In order to place the values in microlumens per m² (lux¹0-6) in context, Table 7 provides some examples of approximate values placed on a number of environmental comparators, however these are merely an illustration to place the results in a real world environment. The actual perceived brightness will depend upon a number of factors including bulb manufacturer, bulb type, specific construction (single/multiple colour LEDs etc) atmospheric conditions, absorption spectrum, individual eye characteristics and capabilities.

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Comparison Object	Approximate Illuminance (micro-lumens per m²)
Car Halogen main beam approaching 1km	Up to 1,000,000 (can vary significantly between cars)
International Space Station (400km up)	1000 (depends upon relative position of sun)
Car Brake Light at 0.5km	400
Car Brake Light at 0.7km	200
Car Brake Light at 1.0km	100
Car Brake Light at 2.0km	25
Car Brake Light at 5.0km	4
Car Brake Light at 10km	1
Front Cycle Light at 0.5km	140 (Modern high power white LED)
Front Cycle Light at 0.7km	70
Front Cycle Light at 1.0km	35
Front Cycle Light at 2km	9
Front Cycle Light at 5km	2
White LED Street Light at 0.5km	500 (Viewed from the horizontal)
White LED Street Light at 0.7km	250
White LED Street Light at 1.0km	120
White LED Street Light at 2.0km	30
White LED Street Light at 5.0km	8
Sodium Street Light at 0.5km	300 (Viewed from the horizontal)
Sodium Street Light at 0.7km	150
Sodium Street Light at 1.0km	75
Sodium Street Light at 2.0km	20
Sodium Street Light at 5.0km	5
Brightest Star in the Sky (Sirius)	13
Airliner flying at 30,000ft)	Nav Lights 0.4 to 5; anti-collision lights 2 to 20
Typical bright star (e.g. Orion)	0.5 to 2.0
Faintest light visible from street lit area	0.4
Visible limit for fully dark-adapted eyes	0.02

Table 7 Comparisons of approximate micro-lumens values



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28. If there is a requirement to consider the brightest turbine in terms of emitted candela rather than micro-lumens, Table 8 provides data on which turbine emits the most candela towards each viewpoint but takes no account of the distance between light and viewpoint.

Viewpoint	Turbine	Distance (KM)	Candela	Candela at 10%	Obscured
1	7	2.95	75	8	
2	7	3.69	78	8	
3	1	3.7	75	8	
4	7	4.65	92	9	
5	1	5.32	83	8	
6	1	7.73	140	14	
7	3	7.66	245	24	
8	7	14.96	642	64	
9	7	8.63	245	24	
10	3	16.38	1055	106	
11	7	20.3	1580	158	
12	7	16.03	642	64	
13	7	11.6	642	64	
14	7	8.11	218	22	
15	7	7.99	218	22	
16	7	9.7	304	30	
17	7	10.97	378	38	
18	7	12.71	949	95	
19	7	22.8	1314	131	
20	3	14.9	448	45	
21	7	17.03	706	71	
22	7	5.97	196	20	
23	7	4.77	1790	179	M
24	1	13.47	2092	209	

Table 8 Brightest Turbine Hub Light measured in Candela emitted towards a viewpoint

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Part 2 Mitigation

Intensity Reduction (ANO Lighting: 2000cd down to 200cd)

29. The lights (IR and visible red lights) will be switched on between Evening Civil Twilight and Morning Civil Twilight in accordance with the UK Almanac; approximately 11 hours per day averaged over the year.

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30. The primary mitigation consideration in addition to the already described reduction in brilliance due to elevation angle, is taken from Reference D which states:

'If the horizontal meteorological visibility in all directions from every wind turbine generator in a group is more than 5 km, the intensity for the light positioned as close as practicable to the top of the fixed structure required to be fitted to any generator in the windfarm and displayed may be reduced to not less than 10% of the minimum peak intensity specified for a light of this type'.

- 31. It is therefore possible to take advantage of the CAA SARG Policy Statement dated 01/06/2017 and incorporate the option to reduce the hub height lighting to not less than 10% of the minimum peak intensity specified for the installation in good weather; in essence, reducing the 2000cd obstruction lights to 200cd in meteorological visibilities greater than 5km. Note: This concession is not applicable to MOD specification IR lighting, which is covered separately.
- 32. It will be necessary to calculate how much time the lights would spend at 2000cd and at 200cd. To assess historical visibility in this central region the closest meteorological station to Giant's Burn is at Glasgow Airport. Note: there are no meteorological stations that publish meaningful historical data closer to Giant's Burn. However, although the visibility at Glasgow will not be identical to Giant's Burn both locations are invariably in the same air mass for the majority of the time and will give similar observations over the longer period.

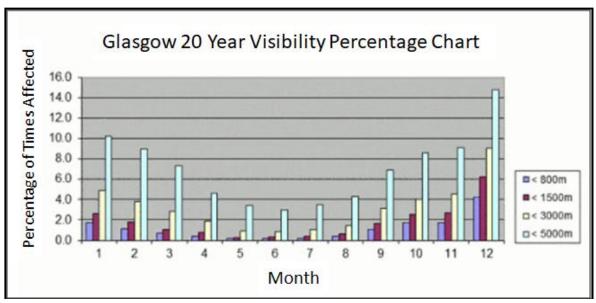


Table 9 Glasgow Visibility



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33. This table shows that the visibility is below 5km (light blue bar) for an average of 7% of the

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- This table shows that the visibility is below 5km (light blue bar) for an average of 7% of the time. This suggests that the Giant's Burn turbine lights will be at 2000cd for 7% of the time and 200cd for 93% of the time.
- 34. In addition, visibility improves with height since the concentration of particles (dust, haze) and liquid droplets (water) reduces with height and the air also becomes thinner. It could be argued that the Giant's Burn visibility, on a 300-400m hill, will be better than that at Glasgow

Obstruction Light Weather Obscuration.

- 35. On occasion, the visibility in the area of Giant's Burn will reduce significantly due to the presence of cloud on the hills. If the Giant's Burn turbines are in cloud, then the obstruction lights will not be seen. The designated turbines will carry the CAA/ANO lights on the turbine hub. The average terrain height at the base of these turbines is around 1100-1400ft above mean sea level (amsl). The hub heights for the proposed turbines will be around 400ft above ground level (agl) giving hub heights averaging around 1500-1800ft amsl. For aeronautical reasons meteorological cloud bases are quoted in feet (ft).
- 36. It is now possible to compare the average **turbine hub/light** height of **1500-1800ft** amsl with the actual cloud bases recorded by the Met Office at Glasgow Airport, again, over a 20-year period as shown in Table 10.

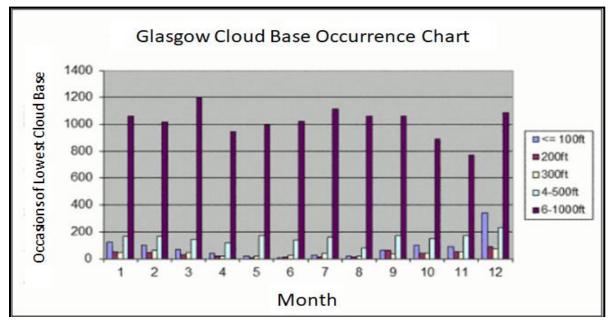


Table 10 Glasgow Cloud Base

37. The burgundy columns (600-1000ft) indicate that the cloud base will range from approximately 600-1200ft below turbine hub heights on around 1000 occasions a month. At this distance below the turbine hubs the lights will be completely obscured to the general public. The other columns (light blue in particular 400-500ft) indicate that on a further 300-500 occasions a month the lights will be completely obscured by cloud even to those observers on the Giant's Burn hill itself. Note: Met Office statistics report cloud base in occurrences as opposed to total duration.



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38. Whilst Glasgow is not Giant's Burn, Met Office statistics show that the cloud base reduces in the region of hills. It could be argued that at Giant's Burn, located on a 400m hill, the cloud base would be lower than at Glasgow thus providing even greater degree of light obscuration than calculated here.

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Weather Obscuration Conclusion

39. It is most important not to try and combine the two different observations, visibility and cloud-base, into a single statement. <u>Informal advice</u> direct from Met Office and Airport forecasters indicates that the information for Giant's Burn, so gathered, should be presented as follows:

Meteorological observations suggest that the turbine hubs will be <u>obscured on more than a thousand occasions a month</u> by cloud. (Obstruction lights not visible to the public)

When not obscured by cloud, the visibility in the area of the turbines can be expected to exceed 5km for up to 93% of the time. (Obstruction lights switched down to 200cd)

Conclusion/Notes

- 40. The purpose of this Lighting Brief is to identify an obstruction lighting arrangement that will have the minimum effect upon the environment but at the same time is a safe design for night low level operators. This has been accomplished by using a combination of CAA ANO and MOD IR lights.
- 41. Applying the CAP 764 Draft criteria for visible red obstruction lighting results in a lighting solution that requires all seven turbines to carry a visible red ANO light. By applying current CAA dispensations and then matching the lighting to the operators that will require night visible lighting, minimal but aviation safe layout was achieved. This results in a total of:

3 x ANO Red 2000/200cd lights and 7 x MOD IR 600mW/sr lights.

42. Furthermore, the site is in an area where it will benefit from 90% light-dimming in good-weather and obscuration of both turbines and the visible ANO lighting in poor weather. This lighting layout has been sent to the CAA for approval. When they respond, their lighting dispensation approval letter will be attached at Appendix C..

The lights will be regularly obscured by cloud and when not obscured set at the lower 200cd for approximately 93% of the time.

43. The CAA currently state: *met visibility should be measured at suitable points around the wind farm.* In the case of the Giant's Burn turbines: Visibility Meters on **T1, and T17** will meet this criterion.



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Technical Mitigation

44. One other form of potential mitigation commonly discussed is the installation of an Aircraft Detection Lighting System (ADLS). There are two possible methods of detecting an aircraft approaching a wind farm that will automatically turn on the aviation obstruction lights, firstly through the use of a suitable primary surveillance radar (PSR) or secondly, the use of aircraft installed Electronic Conspicuity (EC) equipment with a suitable receiver at the wind farm. There are some significant technical and regulatory issues to be overcome before any such system can be installed and operated in the UK.

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45. In the case of PSR, this is already in use at wind farms in Europe; as an example the Terma Scanter 5002 radar is installed at a number of sites as shown in Figure 10. The main regulatory constraint is that although such systems are in use in Europe, in the UK, where airspace tends to be shared to a much greater extent between users, the CAA have yet to mandate the performance parameters that such a system must be capable of fulfilling. For example, the coverage requirement will need to be defined in terms of maximum range of detection and activation (which may vary depending upon the speed of the aircraft), base of cover (above ground level) and almost certainly a maximum height coverage to avoid unnecessary activations, which a PSR on its own cannot ascertain. An initial set of draft requirements was promulgated in 2018 but these were for discussion with aviation stakeholders and the wind industry and it cannot be assumed that these are going to be the final criteria. Even if the standards are defined, it may be that any single radar will not be capable of delivering the required coverage where, for example, a wind farm is located on a hill and aircraft may approach below the wind farm from any direction. It may then become necessary to install multiple radars in order to achieve the required coverage at low level. This in itself may lead to limitations due to mutual interference in what is already a crowded part of the electro-magnetic spectrum, (although the Terma radar does have some anti-interference capabilities) but the additional radars may affect other systems working in the same frequency band. There would also be additional planning issues to consider, such as the visual impact of additional aerials, and rotating arrays. Technical constraints also mean that it will be necessary to position the radars some distance outside the windfarm as shown in the example below in order to avoid turbines screening the radar and to provide the required height coverage.



Figure 10 Terma 5002 Radar at a Wind Farm in Germany

46. The one major advantage of PSR is that it will detect any aircraft, both those transponding and those that are not, known as non-co-operative targets. Depending upon how the regulatory process



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moves forwards, this may have a major effect on which systems to use for ADLS. In response to a recent planning inquiry paper the CAA responded stating in a letter dated 21 April 2021: For the UK, there are some challenges to be resolved. The cost/benefit of the use of primary surveillance radar for the active detection of aircraft, spectrum availability, incentive pricing cost and geographical separation required before frequencies can be re-used potentially makes this a less than optimal solution.

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47. The alternate system is one based upon a reliance on aircraft carried Electronic Conspicuity (EC) transponders. Currently light aircraft flying clear of regulated airspace in the UK below 10,000ft are not required to carry a transponder (one example being Secondary Surveillance Radar or SSR). Most aircraft do, but not all. The CAA has been encouraging fitment by all aircraft and hope to have a regulatory system in place within the next few years requiring all flying machines to be fitted. Unfortunately this is not a simple process. This issue has been running for at least 20 years so far, however some limited progress is now being made. In the same response to a recent planning inquiry paper the CAA stated: 'At the same time, the lack of interoperability between the wide variety of electronic conspicuity devices currently available may require careful consideration of the specification of any passive system receivers and how they are deemed compliant to be deployed and operated. 'The letter goes on to state: 'We concur that not every situation may require ADLS to be fitted and operated; Article 222 or 223 requirements of the Air Navigation Order will remain, and the CAA may agree a specific solution under Section 7 of Article 222 and Section 11 of Article 223. However, ADLS could potentially provide an acceptable means of compliance that could provide greater certainty for developers when developing planning proposals on CAA acceptance and assist with discussions with communities during planning consultation.' What this letter is saying is that ADSL using EC is technically feasible but that until the regulatory actions concerning the mandatory carriage of a compatible EC system have been completed and signed into law, and the coverage requirements agreed, uncertainty remains unless a planning condition to require the retrospective installation of a system is considered appropriate. The length of time that this is likely to take is difficult to estimate, however, realistically it is likely to be within a two to five year timeframe as it is a small part of a much wider airspace modernisation programme currently under way. Additionally, the CAA also issued a Guidance Notice dated 26/10/21 entitled: 'Electronic continuity specifications: enabling interoperability between airspace users'. This announced the establishment of a task force to jointly develop electronic conspicuity specifications to enable interoperability between airspace users. It goes on to state: 'The adoption of EC specifications will not be mandated UK wide. Users of other systems can continue to benefit from the functionality that those products offer'. This does not mean that an EC triggered ADLS system will not be feasible, but the regulatory challenges mentioned above may take longer to resolve, a position reinforced by the Scottish Government recently in relation to the Narachan Wind Farm decision where Ministers stated the following: 'The Scottish Ministers have carefully considered the option of imposing a suspensive condition to secure the installation of an ADLS, prior to construction of the proposed Development, but do not find that the evidence provided to date on the matter affords sufficient assurance that either method would be capable of being installed on the proposed Development within the next 5 years. As such, taking account of the resulting uncertainty on timescales for the deployment of the proposed Development if it were to be consented, the Scottish Ministers consider it would not be appropriate in this case to impose the suspensive condition proposed by the Reporter to mitigate the effects of the proposed Development's lighting on the SQs of the North Arran NSA.'

48. What is clear is that when ADLS is finally mandated by the CAA, the carriage of compatible transponders is also mandated and all aircraft fitted with them, this is likely to be a realistic way of



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triggering an ADLS system. Such systems are passive at the wind farm and will not, therefore cause any interference. As shown in Figure 11 they require unobtrusive small aerials, approximately 1.2 metres long that are very reliable and relatively inexpensive to install and operate.



Figure 11 ADSB/SSR Passive Aerial

- 49. Bearing the above in mind, it might be prudent to ensure that lighting installed on the turbines is compatible with any future EC triggered ADSL system, so that when the regulatory process and aircraft equipage has been completed, it will be a relatively cheap and simple exercise to retro-fit such a system. Alternately, the ADSB/SSR aerials and system could be installed when the wind farm is constructed, ready for activation when required. Unfortunately, it is still not certain that the regulatory process and equipage issues will be completed within the lifetime of a planning consent.
- 50. An ADLS system may not be suitable for every location, depending upon the nature of aviation operations at night in the area around the wind farm and the activation criteria that are finally mandated by the CAA. If located close to the approach for a major airport for example, the lights might be required to be turning on and off continuously but this is very unlikely to be the case at Giant's Burn. The EC activated ADLS system will be able to differentiate between civil traffic and SAR/HEMS/military traffic using NVD and not therefore activate when these types of aviation operations are taking place within the activation zone for the system. The infrared lights that these types of operations rely on will always be on at night, but of course are invisible to the naked eye and will have no effect on the visual impact of the development.

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Comment

51. In recent months various briefing documents have been in circulation suggesting that visible obstruction lights are not required in the current aviation environment. The CAA have briefed WPAC that they do not support this position and would consider prosecuting organisations that do not follow the existing guidance and regulations. However, change will come; this will be led by the CAA and be centred on the new draft CAP 764 (as adhered to in this report) and the future development of ADLS.

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- 52. From the direct experience of WPAC staff who have over 40 years of day/night low flying over land and sea both with and without NVG/Ds, the inclusion of adequate visible red lighting is important to cater for both routine operations and the inevitable unplanned outcome. Pilots uncertain of their location together with emergency situations and system failures of critical night low flying equipment are circumstances that require a degree of visible obstruction lighting on large wind turbines.
- 53. In addition, future green energy aircraft (hydrogen/electric and battery powered) will fly considerably lower and slower than current aircraft and will be significantly limited in track variation by much shorter ranges. Good visible obstruction lighting will become more, not less important in this low direct flight environment.
- 54. Finally, an aircraft colliding with a wind turbine is thankfully an extremely rare event but one with enormous potential consequences. A standard risk assessment as part of an aviation safety case would conclude that even a very low probability of a significant dangerous event is still unacceptable and must be mitigated, in this case by the fitting of visible obstruction lights.

Conclusion

- 55. This report has assessed the requirements for both visible CAA approved aviation lighting and MOD approved Infrared lighting for the Giant's Burn wind farm. The resulting layout is set out in Figures 4 and 6 and makes use of both CAA/ANO Red lights and MOD IR lights. The proposed layouts have been sent to the CAA and MOD DIO for approval. The MOD will approve the IR lighting layout as there is no concession required and when the CAA have considered the proposal and responded, their concession letter will be included at Appendix C.
- 56. The report also provides the brilliance of lights that will be visible taking into account the elevation angle between the turbine hub obstruction light and the viewpoints and the distance between each turbine and each viewpoint. The report shows that for up to 93% of the time the lights will only be required to operate at 10% luminous intensity, which will significantly reduce obstruction light effects in the area. Further interpretation of these results can be undertaken by a Landscape and Visual Impact Assessment expert.
- 57. The report then identifies additional mitigation options that, should the regulatory process allow, enable the visible medium intensity turbine lights to be switched off for the vast majority of the time and activated only on those occasions when an aircraft activates the system.

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Authors

Cdr John Taylor RN (Ret) – after a career in the Royal Navy specialising in Air Traffic Control (ATC), Airspace Management and Air Defence which culminated in leading both the ATC and Fighter Control Specialisations, John worked for Lockheed Martin UK for three years as a Principal Consultant and Business Area Manager responsible for Air Traffic Management Consultancy, including the provision of advice to wind farm developers. In 2008 he founded WPAC Ltd and since then he and his team have provided aviation advice in relation to over 2000 wind farm and wind turbine sites, given evidence at a number of planning inquiries and enabled many sites to overcome aviation objections where it was feasible to do so. He and his team have also provided advice to a number of Local Planning Authorities, Renewable UK and the Aviation Fund Management Board, including organising workshops and the provision of guidance documents. John also advises planners and developers in relation to physical and technical safeguarding of non-wind farm developments in the vicinity of aviation facilities.

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Sqn Ldr Mike Hale RAF (Rtd) has over 45 years, piloting, instructing and examining experience on numerous military fast jet aircraft through to a range of civilian and military general aviation training aircraft and gliders. He has held many posts including Flying Instructor, Training Officer, Flight Commander, Squadron Commander and Principal Tornado AD Force Examiner. He has amassed over 10,000 flying hours of experience when operating at many locations around the world. In parallel to his flying duties, Mike held the post of Officer Commanding the MOD Low Flying Operations Squadron (OC LFOS). In this post he was both Low Level Airspace Manager for the MOD & Wind-Farm Subject Matter Expert for the Defence Infrastructure Organization (DIO). During that period, he assessed over 14,000 wind-farm pre-applications and 2000 full applications against low flying, weapons range, specialist airspace, local community and aerodrome safeguarding criteria. Mike also instigated two Qinetiq ground based Infra Red obstruction lighting trials. These were followed by instigating and managing the MOD Infra Red/Low Intensity (Henlow) flight trials and the CAA/MOD/Trinity-House/RUK off-shore IR/Morse (North Hoyle) flight trials. In conjunction, Mike organised numerous and various supporting trials including night vision equipment compatibility and detailed lighting beam overspill analysis (where light is emitted outside the required specification envelope). In 2012, he was awarded an MBE for generating a proactive and mutually successful working relationship between the Wind Power Industry and the MOD Air Staff.



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Appendix A Lighting Results Tables

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	4.07	-7.4	75	8	4.5	0.5	
3	3.33	-8.2	75	8	6.8	0.7	
7	2.95	-7.9	75	8	8.6	0.9	

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Viewpoint 1 Lazaretto Point

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	3.65	-7.6	75	8	5.6	0.6	
3	3.36	-7.4	75	8	6.6	0.7	
7	3.7	-5.8	78	8	5.7	0.6	

Viewpoint 2 Dunoon, Ardenslate Road

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	3.7	-7.9	75	8	5.5	0.6	
3	3.86	-6.9	70	7	4.7	0.5	
7	4.59	-4.8	100	10	4.7	0.5	Χ

Viewpoint 3 Dunoon Castle

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	5.55	-5.4	87	9	2.8	0.3	
3	4.9	-5.6	83	8	3.5	0.3	
7	4.65	-5.1	92	9	4.3	0.4	

Viewpoint 4 Strone Pier

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	5.32	-5.6	83	8	2.9	0.3	
3	4.42	-6.1	74	7	3.8	0.4	
7	3.4	-6.9	70	7	6.1	0.6	

Viewpoint 5 A815, Orchard

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	7.69	-3.8	140	14	2.4	0.2	
3	6.83	-3.9	136	14	2.9	0.3	
7	5.77	-4.0	133	13	4.0	0.4	

Viewpoint 6 Benmore Gardens (Entrance)



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Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	8.02	-2.9	218	22	3.4	0.3	
3	7.65	-2.7	245	24	4.2	0.4	
7	6.96	-1.8	488	49	10.1	1.0	Χ

Viewpoint 7 Glen Lean

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	16.88	-1.8	535	54	1.9	0.2	
3	16.02	-1.7	535	54	2.1	0.2	
7	14.96	-1.5	642	64	2.9	0.3	

Viewpoint 8 Dornoch Point

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	9.26	-3.2	186	19	2.2	0.2	
3	8.75	-3.1	196	20	2.6	0.3	
7	8.63	-2.7	245	24	3.3	0.3	

Viewpoint 9 Kilcreggan

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	17.2	-1.2	858	86	2.9	0.3	
3	16.38	-1.0	1055	106	3.9	0.4	
7	15.68	-0.3	1867	187	7.6	0.8	Χ

Viewpoint 10 Three Lochs Way, Garelochhead

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	20.97	-0.9	1181	118	2.7	0.3	
3	20.47	-0.8	1314	131	3.1	0.3	
7	20.3	-0.6	1580	158	3.8	0.4	

Viewpoint 11 John Muir Way, Bannachra Muir

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	16.66	-1.9	488	49	1.8	0.2	
3	16.17	-1.7	535	54	2.1	0.2	
7	16.03	-1.5	642	64	2.5	0.3	

Viewpoint 12 Helensburgh



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Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	11.57	-2.1	378	38	2.8	0.3	
3	11.36	-1.9	448	45	3.5	0.4	
7	11.6	-1.5	642	64	4.8	0.5	

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Viewpoint 13 Lyle Hill Viewpoint

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	7.88	-3.8	140	14	2.3	0.2	
3	7.75	-3.5	158	16	2.6	0.3	
7	8.11	-2.9	218	22	3.3	0.3	

Viewpoint 14 McInroy's Point, Gourock

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	7.13	-4.2	122	12	2.4	0.2	
3	7.31	-3.7	149	15	2.8	0.3	
7	7.99	-2.9	218	22	3.4	0.3	

Viewpoint 15 Lunderston Bay

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	8.41	-3.6	154	15	2.2	0.2	
3	8.84	-3.1	196	20	2.5	0.3	
7	9.7	-2.4	304	30	3.2	0.3	

Viewpoint 16 Inverkip

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	9.39	-3.1	196	20	2.2	0.2	
3	10	-2.7	245	24	2.5	0.2	
7	10.97	-2.1	378	38	3.1	0.3	

Viewpoint 17 Wemyss Bay

Turbin e	Distance (KM)	Elevation Angle	Candel a	Candela at 10%	Microlumens		Obscure d
1	11.8	-1.7	535	54	3.8	0.4	
3	12.03	-1.5	706	71	4.9	0.5	
7	12.71	-1.1	949	95	5.9	0.6	

Viewpoint 18 Kelly Cut



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Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	20.93	-1.2	858	86	2.0	0.2	
3	21.74	-1.0	1055	106	2.2	0.2	
7	22.8	-0.8	1314	131	2.5	0.3	

Viewpoint 19 Great Cumbrae

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	14	-2.2	350	35	1.8	0.2	
3	14.9	-1.9	448	45	2.0	0.2	
7	15.87	1.1	2006	201	8.0	0.8	Χ

Viewpoint 20 Rothesay

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	17.28	-1.8	488	49	1.6	0.2	
3	16.96	-1.7	535	54	1.9	0.2	
7	17.03	-1.4	706	71	2.4	0.2	

Viewpoint 21 Ardmore Point

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁶) at 10%	Obscured
1	7.86	-3.2	186	19	3.0	0.3	
3	7.03	-3.2	186	19	3.8	0.4	
7	5.97	-3.1	196	20	5.5	0.6	

Viewpoint 22 Benmore Gardens (Hilltop Viewpoint)

Turbine	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
1	6.17	-1.4	706	71	18.6	1.9	M
3	5.36	-1.0	1055	106	36.7	3.7	М
7	4.77	-0.4	1790	179	78.8	7.9	M

Viewpoint 23 Strone Hill

Turbin	ne	Distance (KM)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux10-6)	Microlumens per square metre (lux ¹⁰⁻ ⁵) at 10%	Obscured
	1	13.44	0.9	2092	209	11.6	1.2	
	3	12.69	1.1	2006	201	12.5	1.3	
	7	11.67	1.6	1643	164	12.1	1.2	

Viewpoint 24 Beinn Mhor



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Appendix B – Abbreviations and Definitions

ADSB	Automatic Dependent Surveillance Broadcast
AGL	Above Ground Level (Height)
ANO	Air Na vigation Order
AMSL	Above Mean Sea Level (Elevation)
ASG	
CAA	
CAP	Civil Aviation Publication (Referrers to Specific Documents)
DIO	Defence Infrastructure Organisation
HNTA	Helicopter Night Training Area
In Flight Visibility	The distance a pilot can see ahead to fly & navigate the aircraft
IR	Infrared
Kts	
LED	Light Emitting Diode
MOD	
	liWatts per steradian: electromagnetic energy output related to solid angle
	Nautical Mile
NVD	Night Vision Devices - Aircraft Mounted
NVG	Night Vision Goggles - Operator Worn
Radar Altimeter	An altimeter that uses radar to accurately measure height above ground
QFE	Setting on Altimeter that gives Height above Airfield
RoAR	
	The Low Flying Rule – part of RoAR
Rule 28	VFR Rules Outside Controlled Airspace – part of the RoAR
D.IIIZ	Renewables UK – The UK Wind Industry Body
SAR Box	Night Training Area for Search and Rescue Helicopter Units
SAR Box	
SAR BoxSSASSR	Night Training Area for Search and Rescue Helicopter UnitsSector Safety AltitudeSecondary Surveillance Radar
SAR BoxSSASSRUKAB	Night Training Area for Search and Rescue Helicopter UnitsSector Safety AltitudeSecondary Surveillance RadarUnited Kingdom Air Prox Board – Investigates Aircraft Near Misses
SAR BoxSSASSRUKABVFR	Night Training Area for Search and Rescue Helicopter UnitsSector Safety AltitudeSecondary Surveillance RadarUnited Kingdom Air Prox Board – Investigates Aircraft Near MissesVisual Flight Rules (Flight without ATC on a see-and-be-seen basis)
SAR BoxSSASSRUKABVFR	Night Training Area for Search and Rescue Helicopter UnitsSector Safety AltitudeSecondary Surveillance RadarUnited Kingdom Air Prox Board – Investigates Aircraft Near Misses

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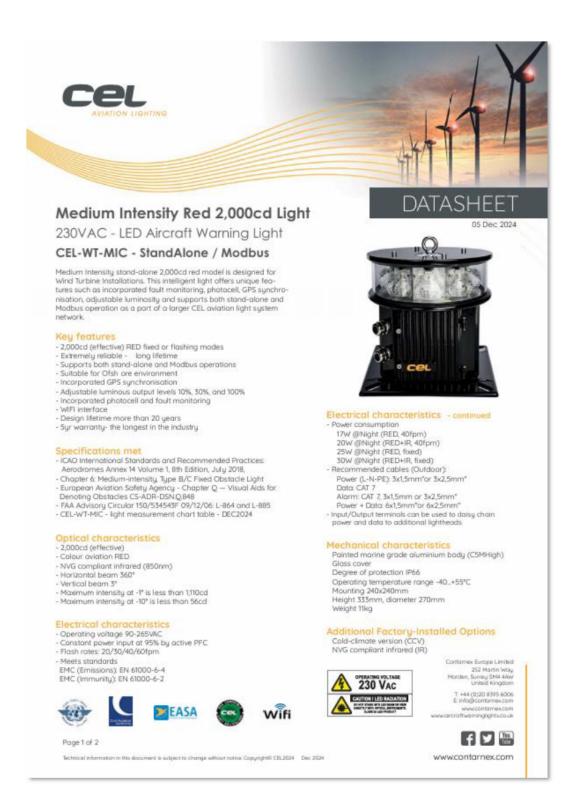
Appendix C CAA Response - to be attached when received



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Appendix D CEL-WT-MIC Specification





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Page 2 of 2 Medium Intensity Red 2,000cd Light 230VAC - LED Aircraft Warning Light CEL-WT-MIC - StandAlone / Modbus CEL-WT-MIC Light unit with mounting dimensions 280 223 **CEL-WT Versions** Medium-intensity Type B (flashing) obstruction light, 2,000cd Red, GPS sync, Photocell, Alarm, 100-240VAC Supports stand-alone and Modbus Network operation. CEL-WT-MIB Medium-intensity Type C (steady burn) obstruction light, 2,000cd Red, infrared, GPS sync, Photocell, Alarm, 100-240VAC. Supports stand-alone and Modbus Network operation. CEL-WT-MIC Medium-intensity Type B (flashing) obstruction light, 2,000cd Red, Infrared 850nm, GPS sync, Photocell, Alarm, 100-240VAC. Supports stand-alone and Modbus Network operation. CEL-WT-MIB-IR CEL-WT-MIC-IR Medium-intensity Type C (steady burn) obstruction light, 2,000cd Red, Infrared 850nm, GPS sync, Photocell, Alarm, 100-240VAC. Supports stand-alone and Modbus Network operation.

Date: 24/06/25



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