



Wind Power Aviation Consultants Ltd

Wind Farm Aviation Lighting and Mitigation Report for Oliver Forest Wind Farm V2.1

Our Reference: WPAC 024/24
Your Reference: Oliver Forest 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
- B. CAP 764 Version 7 (Draft) issued for comment in June 2020 (to be released shortly)
- C. Air Navigation Order (ANO) Article 222
- D. 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
- E. NatureScot General pre-application and scoping advice for onshore wind farms dated Sep 2020
- F. International Civil Aviation Organisation (ICAO) Annex 14 Vol 1 Chapter 6

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 D and F 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 and 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 as proposed by NatureScot in their response to a recent Wind Farm Inquiry.

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 change 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. Discussions with the CAA have clarified that the draft regulations will not be changing in terms of the overarching policy but the wording may be slightly amended in the interests of clarity.



Lighting Layout Starting Point and Assumptions

3. The applicant is proposing a seven-turbine wind farm on the hills overlooking the River Tweed in Peebles. The turbines will be located along the White Knowe, Glenmuck Height and Upper Oliver Hills, to the immediate north of the A701 (River Tweed) valley at Tweedsmuir. The turbines will be 200m to tip.

4. From a civilian aviation perspective, the Oliver Forest site is located under the Scottish Terminal Manoeuvring Area Two (TMA 2) which has a base altitude of 5500ft above mean sea level (AMSL). The airspace below the TMA, and around Oliver Forest, is designated Class G by the CAA (open-unrestricted airspace). Conversely, from a military perspective, the turbines will be located in Low Flying Area (LFA) 16; one of the busiest LFAs in the UK. In addition, Oliver Forest is in the co-located Tactical Training Area (TTA) 20 where military fast jet aircraft operate down to 100ft (30m) day and night.

5. In the hours of darkness (evening civil twilight to morning civil twilight) this area converts to Night Allocated Region (NAR) 2B. Although primarily a fast jet training area, the airspace is also used by MOD and NATO tactical transport aircraft and helicopters for day and night training.

6. In addition, this area will be frequented by CSAR, Police, HEMs and Air Ambulance helicopters as well as military craft by day and night. This type of activity will dictate that the site will require visible red and infra-red obstruction lighting.

Lighting Assessment Overview

- Oliver Forest will be assessed as below/in Class G 'en route' airspace insofar as visible obstruction lighting is concerned.
- Local airspace constraints will be considered for their potential impact on the site.
- Expected CAA and MOD dispensations will be assessed for the site.
- The visible lighting component of the lighting proposal will be developed in accordance with the latest (still draft) CAA CAP 764.
- To accommodate MOD requirements, and other lower airspace night operators, the site will be assessed for Night Vision Equipment compatible lighting in accordance with MOD published obstruction lighting specifications.
- Where possible, the recommended lighting configuration will be optimised to reduce light impact on the local area.
- The Oliver Forest wind farm proposal is for seven turbines at 200m to tip.



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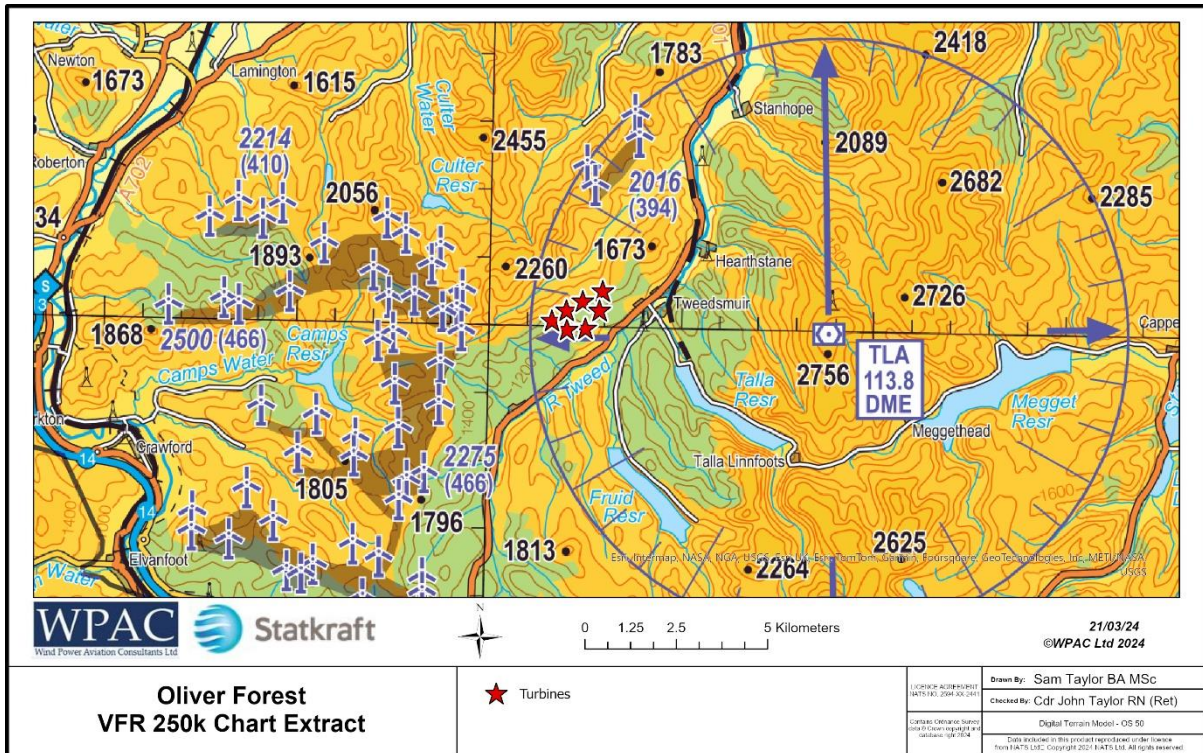


Figure 1 Oliver Forest on an aviation chart

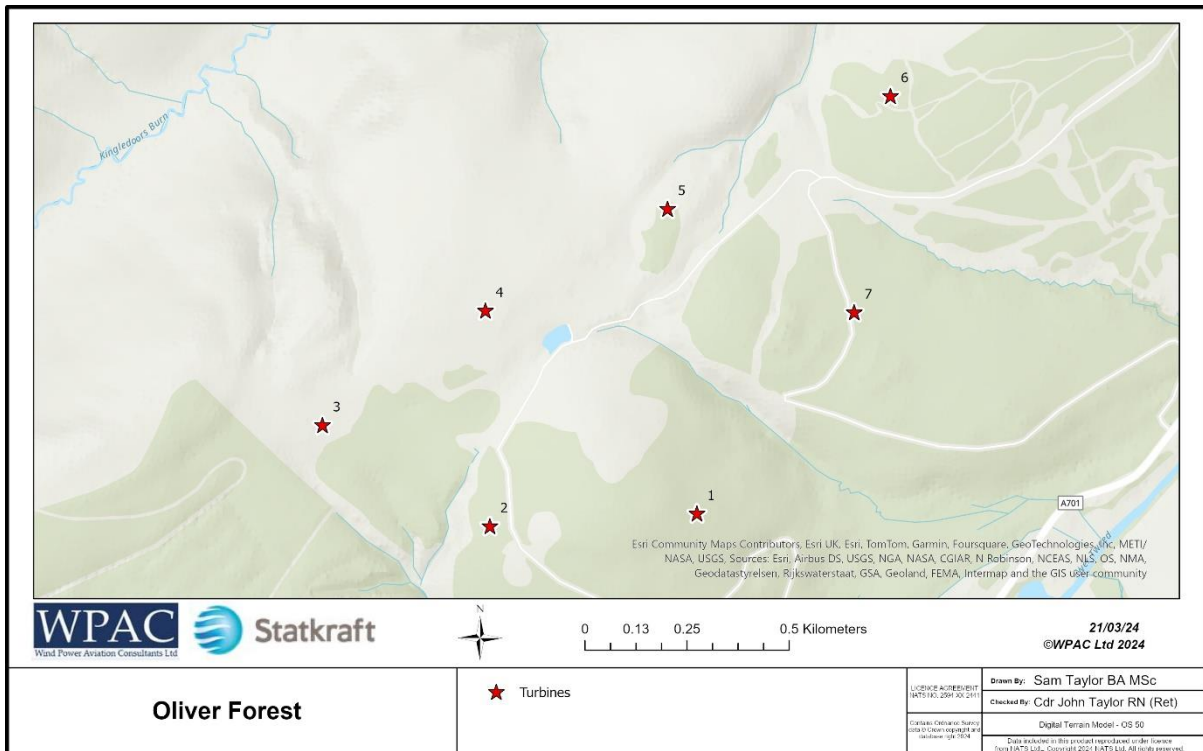


Figure 2 Oliver Forest Wind Farm



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

7. In accordance with the CAP 764 (draft) conditions, the CAA requires:
- That all 'string' perimeter (black dotted line) turbines be lit unless removing a light will leave a gap of less than 900m total between the remaining lit turbines (This distance is negotiable/extendable by application to the CAA).
 - That any turbine within 200m of a 'string perimeter' be lit unless the distance between adjacent turbines is less than 900m total (Again, this distance/requirement is negotiable by application to the CAA).
 - That any unlit turbine does not exceed a 10° up-slope from adjacent lit turbines. All turbines are lit and conform to this requirement.
 - Note: At Oliver Forest, all outside perimeter angles at all turbines are reflex angles (> 180°) thus all turbines are perimeter turbines, as defined by the CAP 764, and will require an ANO light.

Applying these criteria, without expected CAA dispensations, dictates that all seven turbines will require ANO lighting.

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

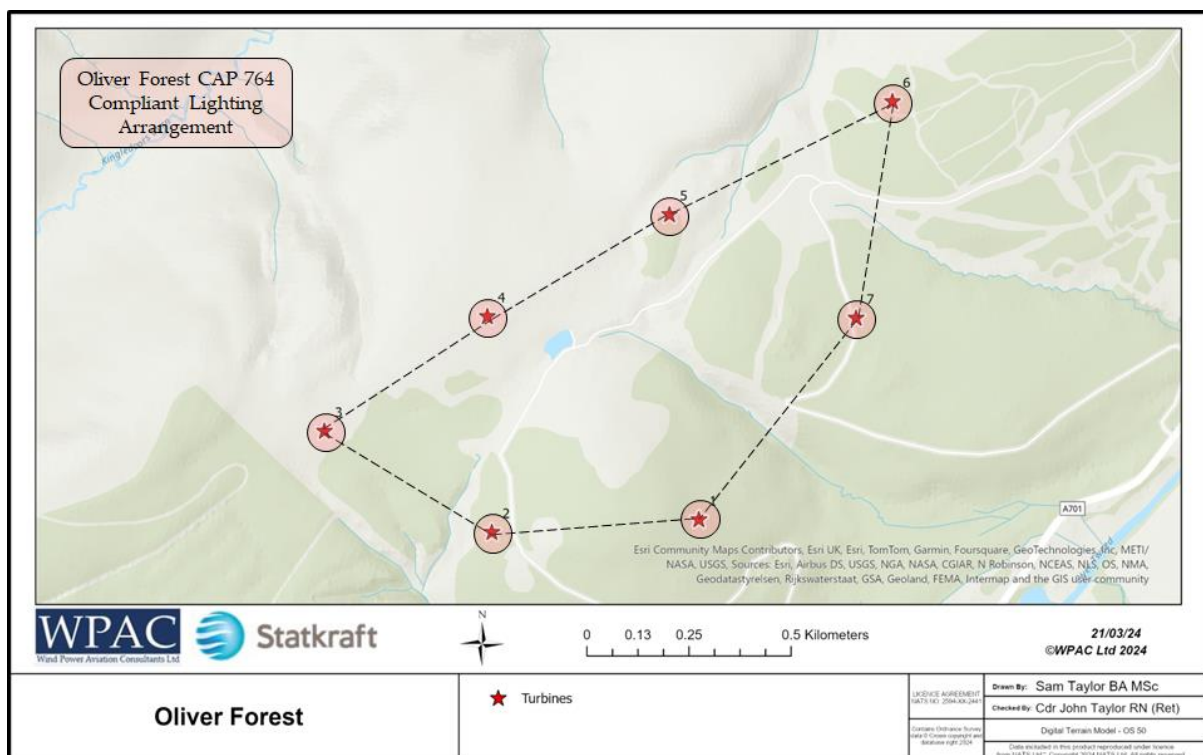


Figure 3 Lighting Layout without CAA Dispensations

CAA-ANO Red 2000/200cd Reduced Lighting Proposal

- 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 (CSAR), Police, Helicopter Emergency Medical Services (HEMS) and Air Ambulance.
- Although, in the past, some night operators would fly at night at low level without night equipment (on carefully pre-planned exercises) 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.
- Aircraft operating without night vision equipment will be flying at safety-altitude or above. Depending upon the protocol adopted or phase of flight, this safety-altitude will be 1000ft (300m), 1500ft (450m) or 2000ft (600m) above the local terrain/highest obstacle. Aircraft/helicopters flying as such, will only need enough visible lights to define the wind farm and its size/shape/perimeter.

Accordingly, the regular outline of the Oliver Forest turbine site can be identified with three ANO visible lights.

Turbines with 2000/200cd Lights: T1, T3 and T6

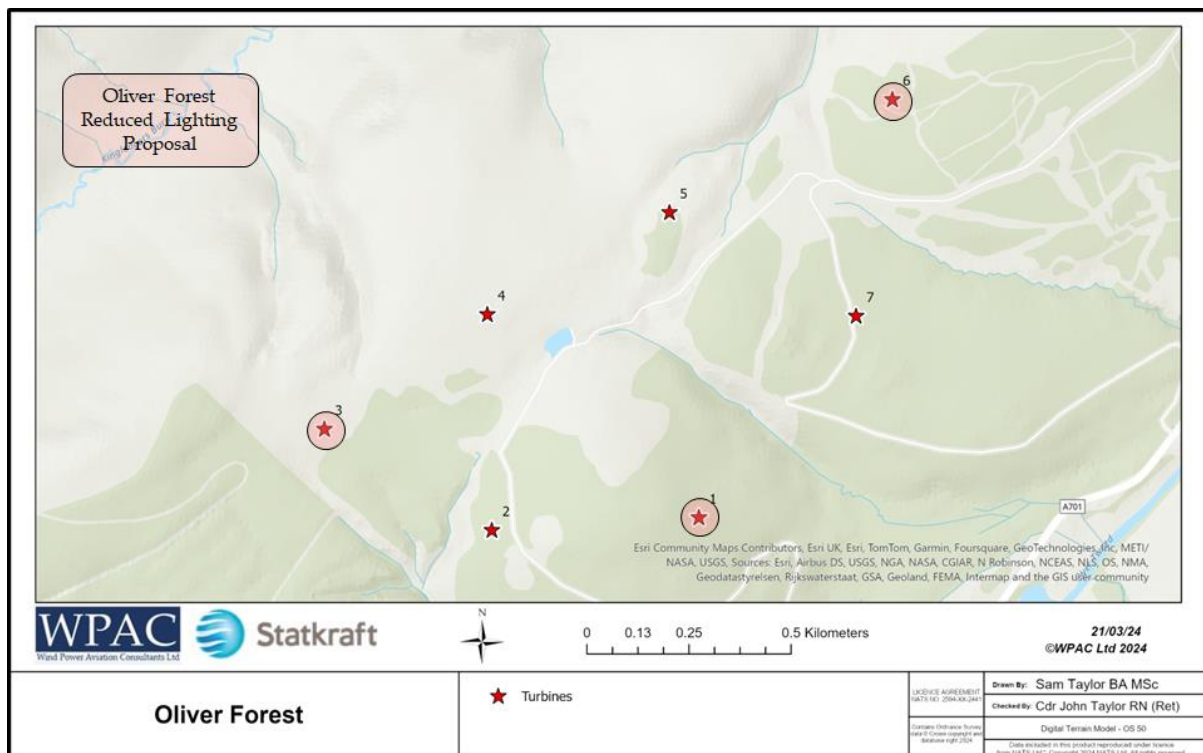


Figure 4 CAA-ANO Lighting Arrangement (including CAA dispensations).

MOD Lighting Requirements

8. 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.

9. 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.

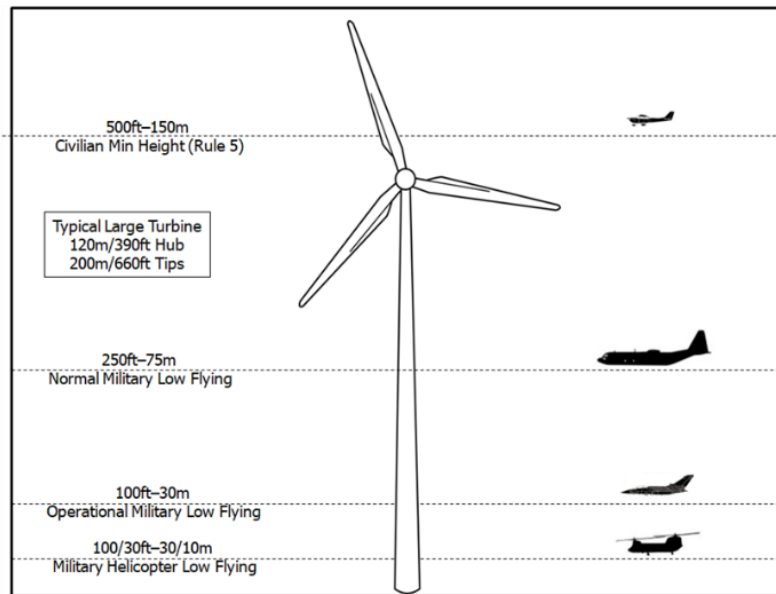


Figure 4 Wind turbine in context with MOD Low Flying

MOD Infra-Red Lighting Layout

10. The MOD requires:

- That all 'compound-perimeter' turbines (see blue dotted line) 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 identical.
- That any dominant turbine, by location or height, be lit. Note: here, all turbines are lit.
- Oliver Forest does meet the MOD small site criteria which caters for approaching 'site-depth-perception' and helicopters passing through larger turbine sites, as opposed to going around. However, without central turbines (all turbines are perimeter turbines) Oliver Forest cannot benefit from this dispensation (not light central turbines).
- Applying the MOD criteria dictates that all turbines of the Oliver Forest site will require IR lighting. Seven hub mounted IR lights in total.

Turbines with Infra-Red Lighting: T1, T2, T3, T4, T5, T6, and T7

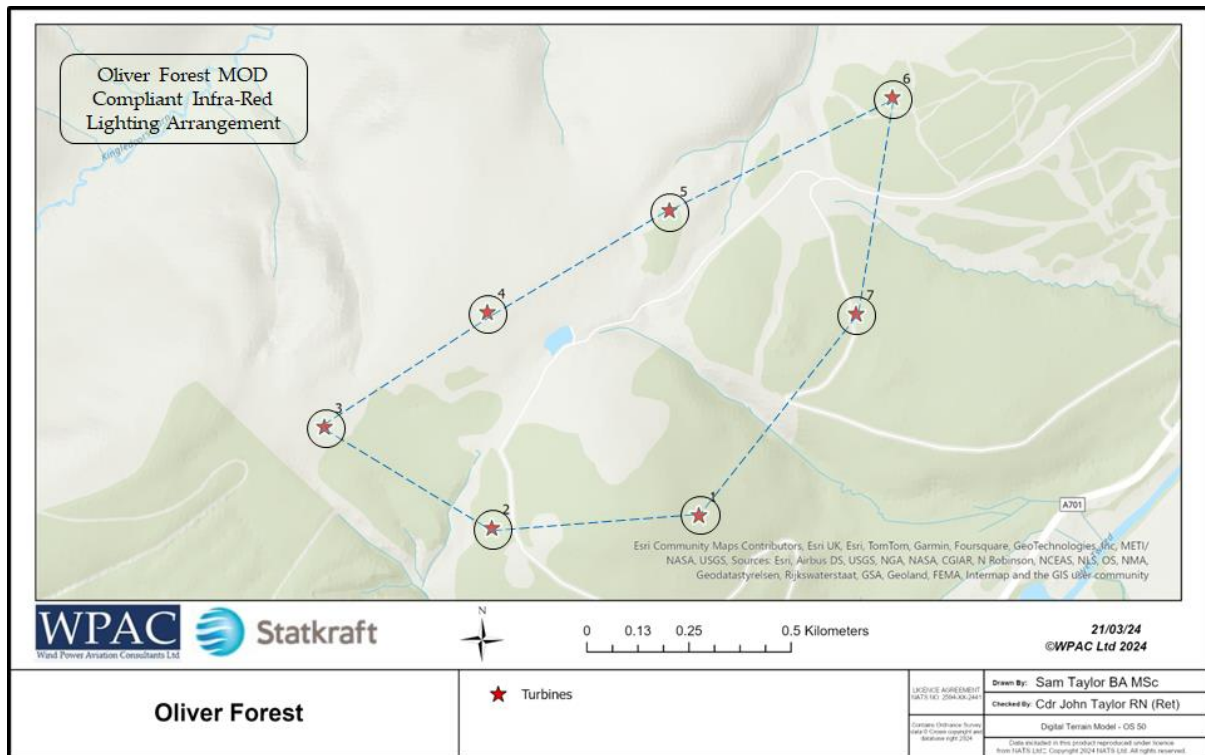


Figure 5 Proposed MOD Infra-Red Lighting Arrangement

Combined CAA Visible Lighting and MOD Infra-Red Lighting

Oliver Forest Turbine Table							
Turbine	Easting	Northing	Base Ht	Tip Ht	Hub Ht	CAA ANO	MOD IR
1	307989	623836	399	200	119	2000/200cd	600mW/sr
2	307482	623805	406	200	119		600mW/sr
3	307072	624052	440	200	119	2000/200cd	600mW/sr
4	307471	624332	453	200	119		600mW/sr
5	307917	624581	421	200	119		600mW/sr
6	308463	624857	409	200	119	2000/200cd	600mW/sr
7	308374	624328	380	200	119		600mW/sr

Table 1 CAA and MOD Lighting Arrangement

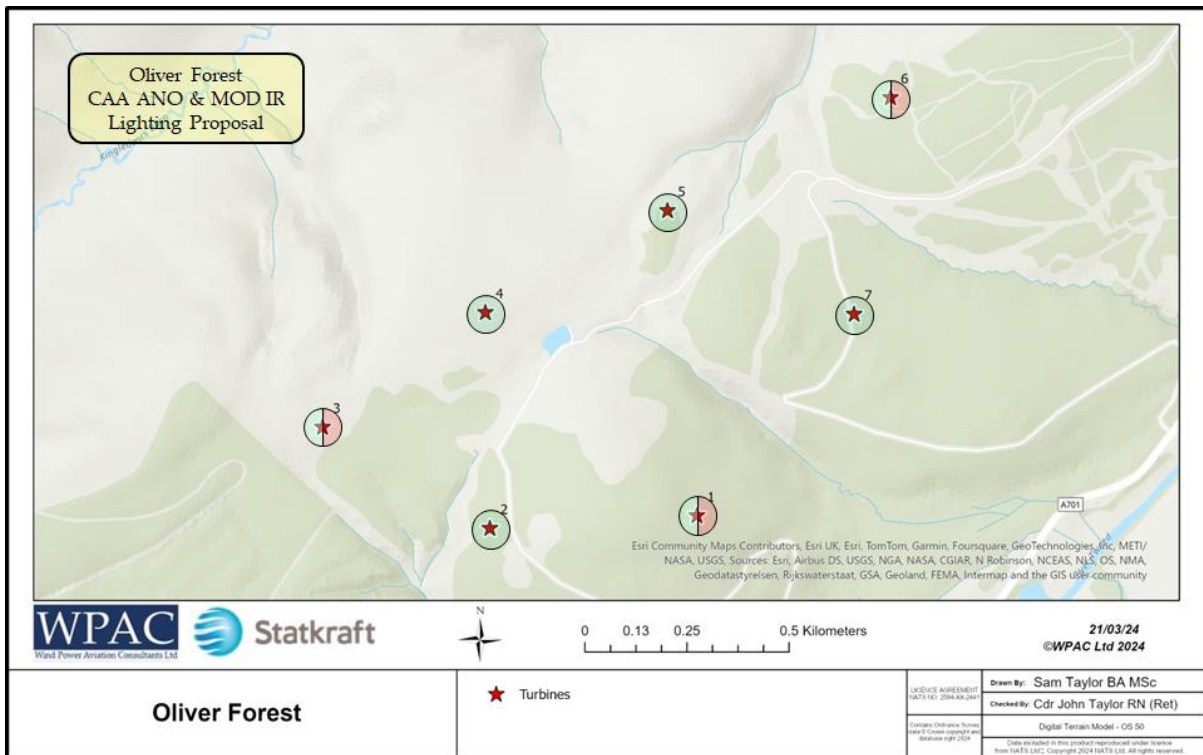


Figure 7 CAA-ANO Visible Red and MOD Infra-Red Lighting Arrangement

ANO Light Specifications

11. 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)

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

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.

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.

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

12. **Low Intensity Mid Mast Lights** – 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.

13. 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 proposed that the CAA guidance requirement for 32cd (Type B) mid mast lights be removed for Oliver Forest. The CAA agreed with this conclusion and this is reflected in the concession approval letter attached at Appendix C.

Table 6-2. Light distribution for low-intensity obstacle lights

	Minimum intensity (a)	Maximum intensity (a)	Vertical beam spread (f)	
			Minimum beam spread	Intensity
Type A	10 cd (b)	N/A	10°	5 cd
Type B	32 cd (b)	N/A	10°	16 cd
Type C	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

14. 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

15. 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.

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

16. 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 standard aviation 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 MI-ACWGAM² in a calibration chamber and produced results showing precisely how much the beam reduces in brilliance at any specified elevation angle. The results are correlated to every 0.1°. These lights are already fitted in a number of locations around the UK.

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

² The Technical Specification is at: <https://www.aircraftwarninglights.co.uk/datasheets/CEL-MI-ACWGAM-datasheet-rev10.pdf>

17. 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.

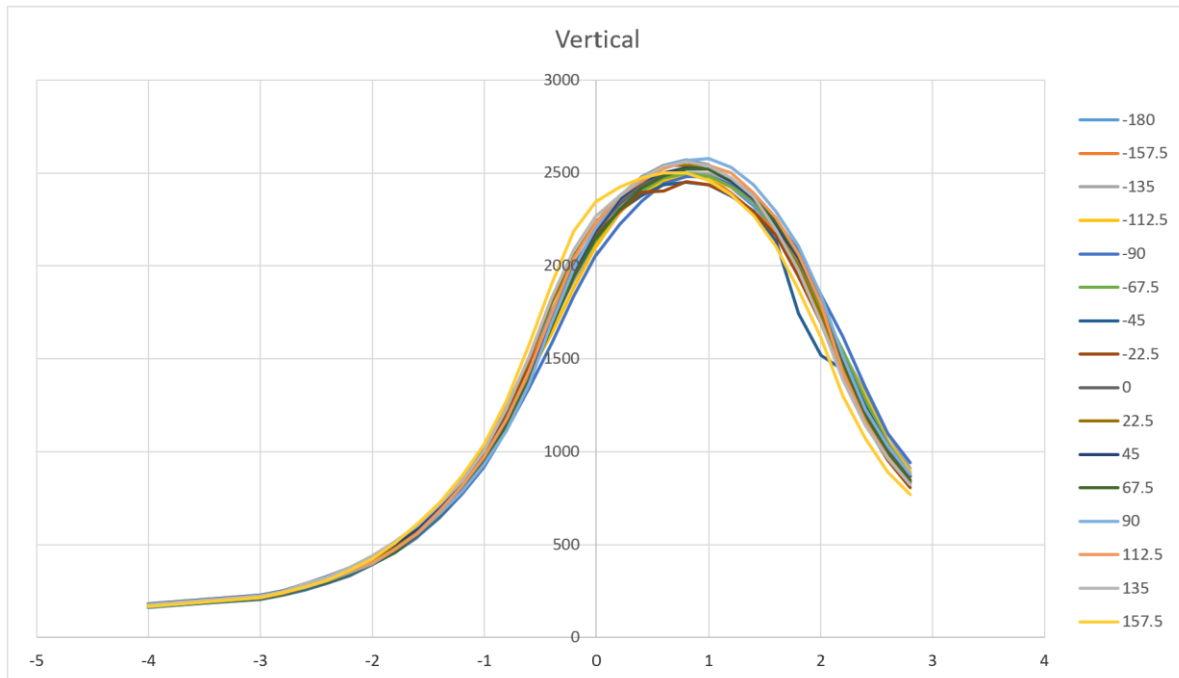


Figure 8 (MI ACWGAM Light Measurement Results)

18. 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 119 metres. 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 Oliver Forest Wind Farm viewpoints. The locations of the viewpoints are shown in Figure 9 and Table 5.

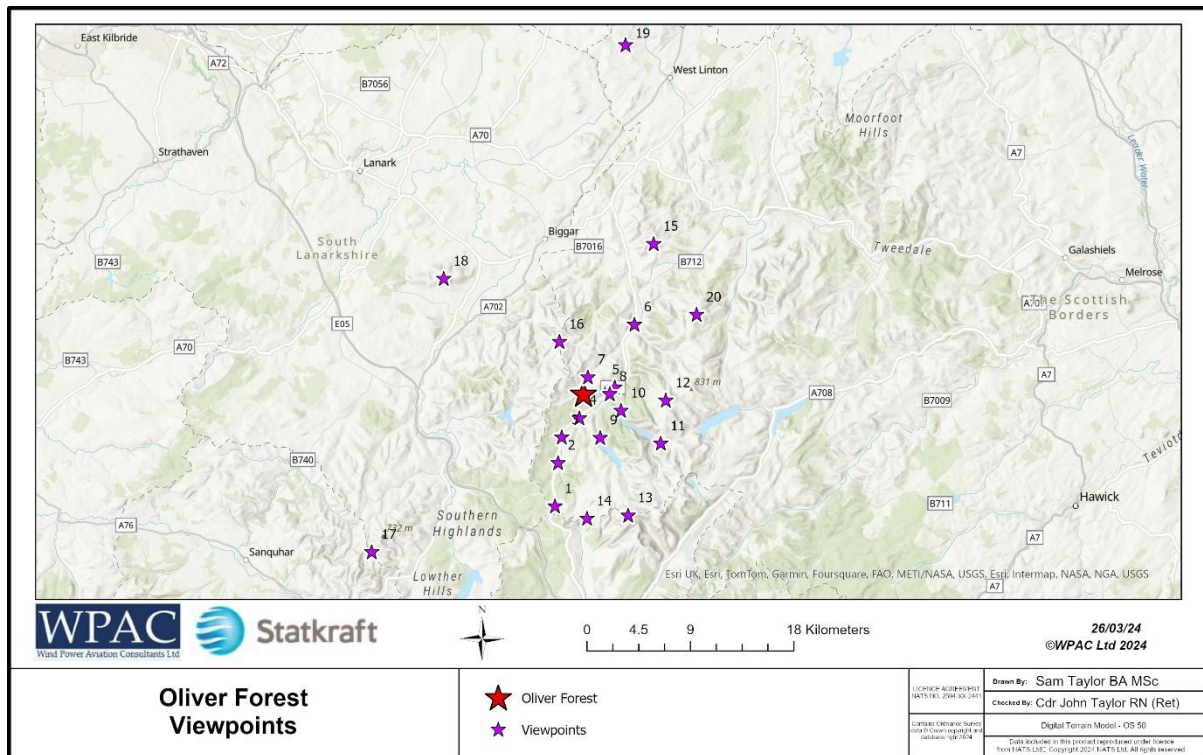


Figure 9 Viewpoint Locations

19. 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 $\text{lumen}^{(10^{-6})}/\text{m}^2$ or $\text{lux}^{(10^{-6})}$. 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.

20. 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	Easting	Northing
1	A701 Source of the Tweed layby	305002	614642
2	A701 Tweedhopefoot	305274	618354
3	A701 layby south of Glenbreck	305592	620850
4	A701 layby near Hawkshaw	307102	622245
5	A701 Tweedsmuir Village Hall	310193	624935
6	A701 by Stanhope	311829	630296
7	Hopehead, Kingledoors Burn	307950	625802
8	Tweedsmuir Bridge	309753	624346
9	Fruid Dam	308916	620565
10	Talla Dam	310736	622899
11	Talla Linn	314094	620072
12	Broad Law	314626	623786
13	Hart Fell	311326	613621
14	Chalk Rig Edge	307780	613525
15	Trahenna Hill	313597	637401
16	Culter Fell	305297	629067
17	Lowther Hill	289037	610500
18	Tinto	295340	634364
19	Byrehope Mount	311130	654683
20	Pykestone Hill	317296	631254

Table 5 Viewpoints

Interpreting the Results

21. 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 in general, the distance between the light and the viewpoint is likely to be the dominant 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	Brightest Lit Turbine	Distance (km)	microlumens per m ² (lux ^{10⁻⁶})	Microlumens at 10%	Obscured
1	3	9.67	10.5	1.05	
2	1	6.12	24.09	2.41	X
3	1	4.04	13	1.3	
4	3	1.8	23.12	2.31	
5	6	1.73	24.97	2.5	
6	6	6.51	5.65	0.56	
7	6	1.12	59.26	5.93	
8	6	1.39	38.93	3.89	
9	1	3.42	17.79	1.78	
10	6	2.99	14.71	1.47	
11	1	7.26	20.61	2.06	
12	3	7.56	30.55	3.06	
13	1	10.6	20.28	2.03	
14	1	10.31	19.61	1.96	
15	6	13.54	11.91	1.19	
16	3	5.13	75.79	7.58	X
17	3	22.49	4.71	0.47	
18	3	15.65	9	0.9	X
19	6	29.94	2.32	0.23	
20	6	10.92	21.01	2.1	

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

22. In order to place the values in microlumens per m² (lux^{10⁻⁶}) in context, Table 7 provides some examples of approximate values placed on a number of environmental comparators, however these are just 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 m ²)
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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23. 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	Brightest Lit Turbine	Distance (km)	Candela	Candela at 10%	Obscured
1	3	9.67	982	98	
2	1	6.12	902	90	X
3	6	5.15	273	27	
4	6	2.94	112	11	
5	6	1.73	75	8	
6	3	7.96	291	29	
7	6	1.12	75	8	
8	6	1.39	75	8	
9	6	4.33	239	24	
10	6	2.99	132	13	
11	1	7.26	1087	109	
12	3	7.56	1747	175	
13	3	11.12	2439	244	
14	1	10.31	2084	208	
15	1	14.67	2258	226	
16	3	5.13	1994	199	X
17	1	23.1	2429	243	
18	3	15.65	2205	221	X
19	6	29.94	2084	208	
20	3	12.52	2515	251	
1	3	9.67	982	98	

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



Part 2 Mitigation

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

24. 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.

25. 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'.

26. 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.

27. It will be necessary to calculate how much time the lights would spend at 2000cd and at 200cd. To assess historical visibility in this region, the closest meteorological station to Oliver Forest is at Prestwick Airport. However, although the visibility will not be identical at these two locations, it will be in the same air-mass for the majority of the time and will give similar observations. Table 9 below is a Met Office table of visibilities throughout the year for Prestwick Airport which are averaged over a 30-year period.

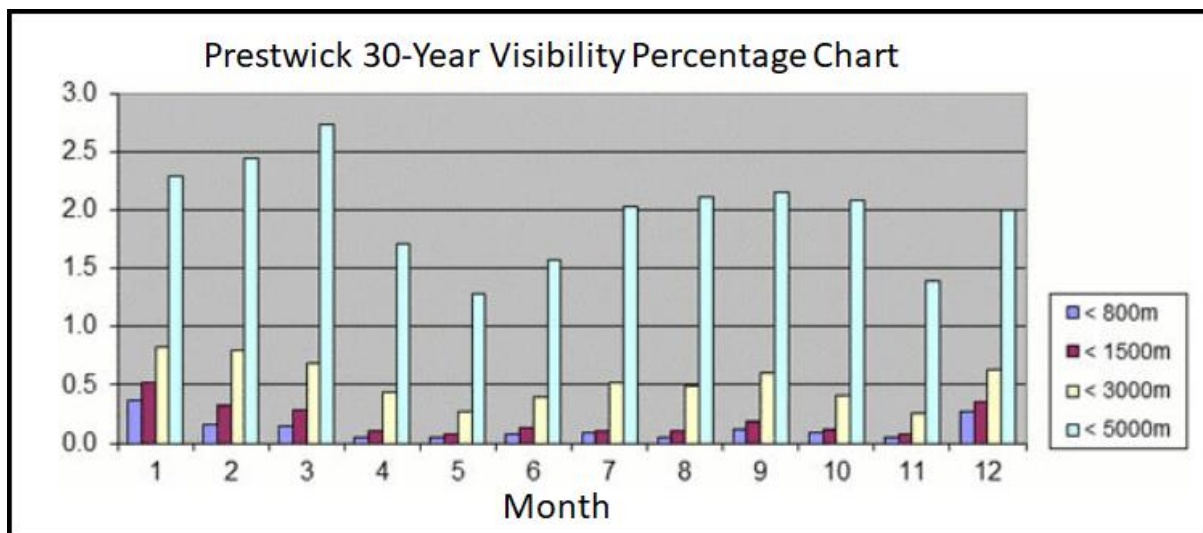


Table 9 Prestwick Visibility Table

28. These Met Office records show that the visibility is below 5km (light blue bar) for an average of 2% of the time at Prestwick Airport. This suggests that the lights at Oliver Forest will be set at **2000cd for 2% of the time (visibility below 5km) and set at 200cd for 98% of the time (visibility above 5km).**

29. Whilst Prestwick is not Oliver Forest, met 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 Oliver Forest visibility would be better than that at Prestwick. In addition, cloud will play its part in the observability of the obstruction lights at Oliver Forest. This can also be obtained from Met Office data.

Obstruction Light Weather Obscuration.

30. On occasion, the visibility in the area of Oliver Forest will reduce significantly due to the presence of cloud on the hills. If the Oliver Forest turbines are in cloud, then the obstruction lights will not be seen. The turbines will carry the CAA/ANO lights on the turbine hub. The average height at the base of these turbines is around 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 1800ft amsl. For aeronautical reasons, meteorological cloud bases are quoted in feet (ft).

31. It is now possible to compare the average **turbine hub/light** height of **1100-1500ft amsl** with the actual cloud bases recorded by the Met Office at Prestwick Airport, again, over a 30-year period as shown in Table 10. The darker red columns (600-1000ft amsl) indicate that, on around 550 occasions a month, the cloud-base will be below the turbine base heights. In addition, the combined blue, red and yellow columns indicate that on a further 200 times a month the weather would be such that the cloud would be so low that the turbines/lights would only be visible to people on the hills when very close to the turbines.

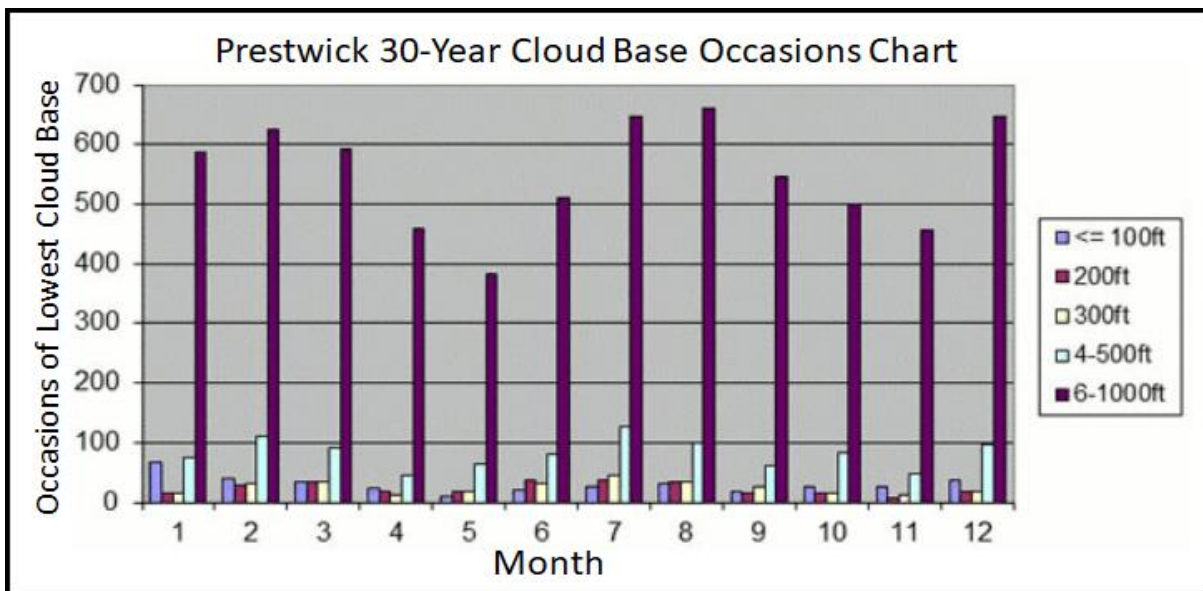


Table 10 Prestwick Cloud Base Table.



32. Again, whilst Prestwick Airport is not Oliver Forest, Met Office statistics show that the cloud-base reduces in the region of hills. It could be argued that at Oliver Forest, the cloud-base would be lower than at Prestwick thus providing even greater degree of obstruction light obscuration than calculated here.

NB: cloud base is recorded in occurrences. An occurrence can be caused by a cumulus cloud (cotton wool cloud) passing through with each cloud causing an occurrence of minutes to hours. Conversely a stratus cloud (horizon to horizon sheet cloud) can cause one occurrence that can last all day or even longer. Data on cloud measured in time (hours/minutes), as opposed to occasions, is not available from Met Offices.

Weather Obscuration Conclusion

33. It is most important not to try and combine the two different observations, visibility and cloud-base, into a single statement. Informal advice direct from Met Office and Airport forecasters indicates that the information for Oliver Forest, so gathered, should be presented as follows:

Meteorological observations suggest that the turbine hubs will be obscured on approximately 750 occasions a month 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 98% of the time. (Obstruction lights switched down to 200cd)

Conclusion/Notes

34. 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.

35. Applying the CAP 764 Draft criteria, for visible red obstruction lighting, results in a lighting solution that requires all turbines to carry a visible red ANO light. By initially 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.

36. Furthermore, the site is in an area where it will benefit from 98% light-dimming in good-weather and obscuration of both turbines and the visible ANO lighting in poor-weather.

The lights will be regularly obscured by cloud and when not obscured set at the lower 200cd for approximately 98% of the time.

Technical Mitigation

37. 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.

38. In the case of PSR, this is already in use at wind farms in Europe; as an example the Terma Scantier 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

39. 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

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.*

40. 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, nothing can be done 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.

41. What is clear is that once the carriage of compatible transponders is mandated and all aircraft fitted with them, this is likely to be a realistic way of 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.

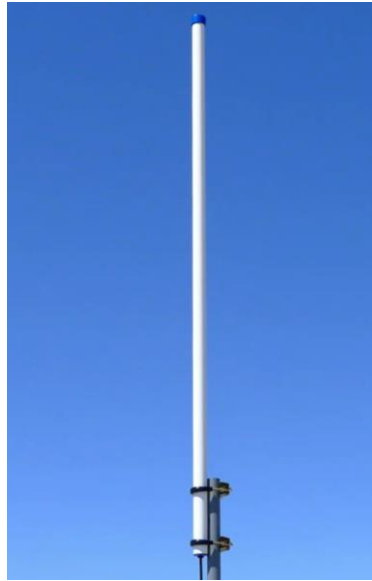


Figure 11 ADSB/SSR Passive Aerial

42. Bearing the above in mind, it would 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. It may therefore be suitable for use as the basis of a planning condition requiring the activation of the system once the regulatory and equipage hurdles have been overcome, however, it is still not certain that the regulatory process and equipage issues will be completed within the lifetime of a planning condition, and therefore would be unable to demonstrate that there is a reasonable prospect of success within that timeframe.

43. 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, however, in a location like Oliver Forest, with limited night low level civilian traffic, the lights will rarely be activated. 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 infra-red 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.

Comment

44. 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.

45. 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.

46. 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.

47. 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

48. This report has assessed the requirements for both visible, CAA approved aviation lighting and MOD approved Infra-Red lighting for the Oliver Forest 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 were sent to the CAA and MOD DIO for approval. The MOD will approve the IR lighting layout as there is no concession required and the CAA have considered the proposal and responded, approving the reduced lighting design as shown in their approval letter at Appendix C to this report.

49. 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 98% 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.

50. 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 rare occasions in this location when an aircraft activates the system.

Wind Power Aviation Consultants Ltd

Wind Farm Aviation Lighting and Mitigation Report for Oliver Forest Wind Farm V2.1

Our Ref: WPAC/024/24

Date: 22/05/24

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.

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 (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	9.71	-0.46	1582	158	16.8	1.7	X
3	9.67	-1	982	98	10.5	1.1	
6	10.82	-0.48	1582	158	13.5	1.4	X

Viewpoint 1

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	6.12	-1.1	902	90	24.1	2.4	X
3	5.98	-2.1	385	38	10.8	1.1	X
6	7.24	-1.1	902	90	17.2	1.7	X

Viewpoint 2

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	4.04	-3.1	212	21	13.0	1.3	
3	3.77	-4.0	172	17	12.1	1.2	
6	5.15	-2.6	273	27	10.3	1.0	

Viewpoint 3

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	1.81	-7.3	75	8	22.8	2.3	
3	1.8	-8.8	75	8	23.1	2.3	
6	2.94	-4.9	112	11	13.0	1.3	

Viewpoint 4

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	2.46	-6.2	75	8	12.4	1.2	
3	3.24	-5.3	75	8	7.1	0.7	X
6	1.73	-9.3	75	8	25.0	2.5	

Viewpoint 5



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Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	7.63	-0.7	1318	132	22.7	2.3	X
3	7.96	-2.5	291	29	4.6	0.5	
6	6.51	-2.8	239	24	5.7	0.6	

Viewpoint 6

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	1.97	-4.3	152	15	39.0	3.9	X
3	1.92	-7.0	75	8	20.4	2.0	
6	1.12	-10.4	75	8	59.3	5.9	

Viewpoint 7

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	1.84	-8.3	75	8	22.3	2.2	
3	2.7	-6.7	75	8	10.3	1.0	
6	1.39	-11.7	75	8	38.9	3.9	

Viewpoint 8

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	3.42	-3.2	208	21	17.8	1.8	
3	3.96	-3.3	203	20	12.9	1.3	X
6	4.33	-2.8	239	24	12.7	1.3	

Viewpoint 9

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	2.9	-3.9	176	18	21.0	2.1	X
3	3.84	-3.5	194	19	13.2	1.3	X
6	2.99	-4.6	132	13	14.7	1.5	

Viewpoint 10

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	7.26	-0.9	1087	109	20.6	2.1	
3	8.16	-1.1	902	90	13.5	1.4	
6	7.47	-0.3	1852	185	33.2	3.3	X

Viewpoint 11



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Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	6.64	2.7	936	94	21.2	2.1	
3	7.56	2.0	1747	175	30.6	3.1	
6	6.26	2.7	936	94	23.9	2.4	

Viewpoint 12

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	10.6	1.5	2276	228	20.3	2.0	
3	11.12	1.2	2439	244	19.7	2.0	
6	11.44	1.3	2393	239	18.3	1.8	

Viewpoint 13

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	10.31	-0.1	2084	208	19.6	2.0	
3	10.55	-0.1	2084	208	18.7	1.9	X
6	11.35	-0.2	1982	198	15.4	1.5	

Viewpoint 14

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	14.67	0.1	2258	226	10.5	1.1	
3	14.85	-0.1	2084	208	9.5	1.0	
6	13.54	0.0	2185	219	11.9	1.2	

Viewpoint 15

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	5.69	2.6	1014	101	31.3	3.1	X
3	5.13	1.8	1994	199	75.8	7.6	X
6	5.08	2.2	1477	148	57.2	5.7	X

Viewpoint 16

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ^{10⁻⁶})	Microlumens per square metre (lux ^{10⁻⁶}) at 10%	Obscured
1	23.1	0.4	2429	243	4.6	0.5	
3	22.49	0.3	2379	238	4.7	0.5	
6	24.08	0.4	2429	243	4.2	0.4	

Viewpoint 17



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Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	16.49	3.5	75	8	0.3	0.0	X
3	15.65	1.6	2205	221	9.0	0.9	X
6	16.24	2.5	1119	112	4.2	0.4	X

Viewpoint 18

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	31.01	-0.1	2084	208	2.2	0.2	
3	30.9	-0.2	1982	198	2.1	0.2	
6	29.94	-0.1	2084	208	2.3	0.2	

Viewpoint 19

Turbine	Distance (km)	Elevation Angle	Candela	Candela at 10%	Microlumens per square metre (lux ¹⁰⁻⁶)	Microlumens per square metre (lux ¹⁰⁻⁶) at 10%	Obscured
1	11.91	1.0	2503	250	17.6	1.8	
3	12.52	0.8	2515	251	16.1	1.6	
6	10.92	1.0	2503	250	21.0	2.1	

Viewpoint 20



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Appendix B – Abbreviations and Definitions

ADSB.....	Automatic Dependent Surveillance Broadcast
AGL.....	Above Ground Level (Height)
ANO.....	Air Navigation Order
AMSL.....	Above Mean Sea Level (Elevation)
ASG.....	Aviation Steering Group
CAA.....	Civil Aviation Authority
CAP.....	Civil Aviation Publication (Referrers to Specific Documents)
cd.....	Candela, a measure of light intensity
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.....	Infra-Red
Kts.....	Knots: a measure of airspeed (10 kts = 12mph = 19 kph)
LED.....	Light Emitting Diode
MOD.....	Ministry of Defence
mW/sr.....	milliWatts per steradian: electromagnetic energy output related to solid angle
Nm.....	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.....	Rules of the Air Regulations
Rule 5.....	The Low Flying Rule – part of RoAR
Rule 28.....	VFR Rules Outside Controlled Airspace – part of the RoAR
ReUK.....	Renewables UK – The UK Wind Industry Body
SAR Box.....	Night Training Area for Search and Rescue Helicopter Units
SSA.....	Sector Safety Altitude
SSR.....	Secondary Surveillance Radar
UKAB.....	United Kingdom Air Prox Board – Investigates Aircraft Near Misses
VFR.....	Visual Flight Rules (Flight without ATC on a see-and-be-seen basis)
VMC.....	Visual Meteorological Conditions (Weather suitable for VFR flight)

Appendix C CAA Response (to be attached when received)

OFFICIAL - Named Parties Only. This information is intended for Wind Power Aviation Consultants Ltd. only

**Strategy and Policy Group
Windfarm Policy**



Mike Hale
Aviation Consultant
Wind Power Aviation Consultants Ltd.
38 Hadrian Way
Chilworth
Southampton
SO16 7HX

20 May 2024
Ref Windfarms / Oliver Forest

Dear Mike,

Proposed Obstacle Lighting Scheme for Oliver Forest Wind Farm

Reference: Oliver Forest Wind Farm Lighting report dated 21 March 2024

1. Thank you for the lighting brief at reference. The report discusses the proposed obstacle lighting plan for the Oliver Forest Wind Farm, located along the River Tweed in Peebles.
2. The proposed Oliver Forest Wind Farm consists of 7 turbines, with height 200m ground to tip. This brings the turbines within scope of the Air Navigation Order (ANO) Article 222 obstacle lighting requirements.
3. We have considered the report carefully and take note of the intent to address concerns relating to adverse visual impacts of aviation lighting on non-aviation receptors while ensuring that the lighting installed on the turbines meets air safety requirements.
4. We note the proposed lighting scheme identifies the perimeter outline and that some mitigation is proposed to be provided by the provision of infra-red lighting for those operators who carry Night Vision Device capability.
5. Under provisions given in the Air Navigation Order (ANO) Article 222 section 6, the CAA provides for the following variation:
 - medium intensity steady red (2000 candela) lights on the nacelles of turbines T01, T03 and T06;
 - a second 2000 candela light on the nacelles of the above turbines to act as alternates in the event of a failure of the main light (note that both lights should not be lit at the same time);

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Wind Power Aviation Consultants Ltd

Wind Farm Aviation Lighting and Mitigation Report for Oliver Forest Wind Farm V2.1

Our Ref: WPAC/024/24

Date: 22/05/24

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- the lights on these turbines to be capable of being dimmed to 10% of peak intensity when the lowest visibility as measured at suitable points around the wind farm by visibility measuring devices exceeds 5km;
- infra-red lights to MoD specification installed on the nacelles of turbines T01, T02, T03, T04, T05, T06 and T07 (note that dimming permission is applicable only to visible lights, not infra-red lighting).

6. Intermediate level 32 candela lights are not required to be fitted on the turbine towers.

7. If the proposed design of the wind farm changes (other than variations due to micro-siting etc.) this is likely to require a revision to this aviation obstacle lighting variation.

Yours sincerely,



Andy Wells
Manager Aviation and Wind Turbine Policy

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