



## Mynydd Llanhilleth Wind Farm

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# Environmental Statement

### Appendix 14A Initial Project Review



August 2024



# Wind Power Aviation Consultants Ltd

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## Aviation Project Review Note for Wood Group UK Ltd Mynydd Llanhilleth Wind Farm

**Our Reference: WPAC/054/22**

**Your Reference: Wood PO 20000585**

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## Initial Project Review Feasibility - Briefing Note re Mynydd Llanhilleth Wind Farm

### Introduction and Scope

- Pennant Walters are planning to develop a wind farm at Mynydd Llanhilleth, Torfaen, and are advised by Wood Group UK Ltd who have requested aviation consultancy advice from WPAC Ltd. This IPR briefing note is a stripped down version of a full aviation report, which may still need to be undertaken if the site is taken forwards in order to fully identify aviation risks and where possible identify consultation and mitigation strategies where needed.. The assessment assumes a development of 8 turbines of up to 180 metres to tip. Radar modelling of all 8 turbines has been undertaken in order to identify any potential radar interference issues. This note will also flag up any issues that in our judgement would create an aviation effect critical to the feasibility of the site. Some initial GIS is also provided to show the location in an aviation context.
- WPAC is currently advising developers and planners on approximately 60 planning applications throughout the UK including 10 in Wales. Since 2008 we have assessed over 3000 wind farm proposals, provided EIA chapters to many planning applications and given expert witness evidence at more than 20 planning inquiries. We have also provided aviation advice to the Welsh Government and negotiated a number of wind farm issues with Cardiff International Airport. Further information is available at [www.wpac.co.uk](http://www.wpac.co.uk)

### Documentation Provided

- Turbine Layouts
- Site Map

Turbine	Location	Turbine	Location
1	SO 24630 02630	5	SO 24821 01806
2	SO 23855 02860	6	SO 24695 01115
3	SO 23485 02270	7	SO 24830 00715
4	SO 23770 01740	8	SO 23300 01000

Table 1 Turbine Locations

### Background

- The site is located as shown in Figures 1 to 3. Figures 2 and 3 show the location in an aviation context with Figure 2 showing the airspace up to 5000ft and Figure 3 up to 19500 ft. The site is approximately 38km to the north-east of Cardiff Airport and 45km north-west of Bristol Airport as shown in Figure 2. The site is also 11km to the east of the Brecon (BCN) VOR/DME radio navigation beacon. Figure 3 shows the site is underneath Class A controlled airspace marked by thick purple lines and is at the confluence of two busy airways taking traffic east/west from London to the Atlantic and Ireland and north/south taking traffic from Manchester/Scotland to Spain and France.



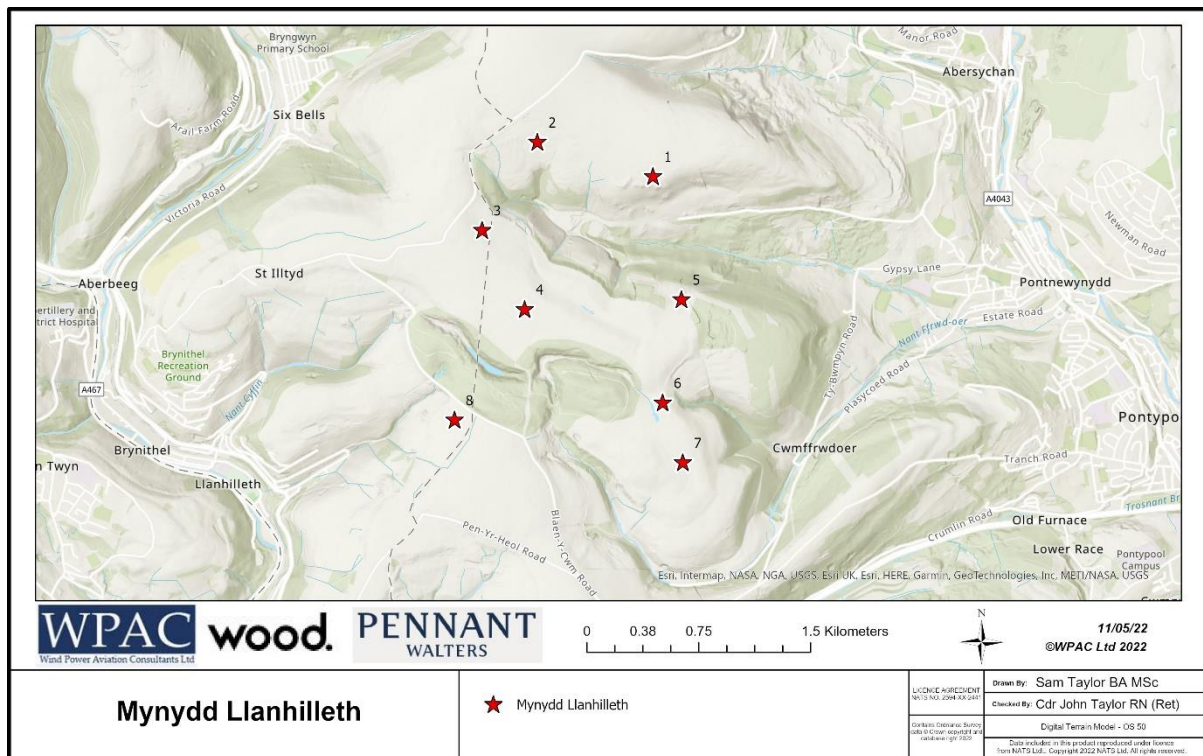


Figure 1

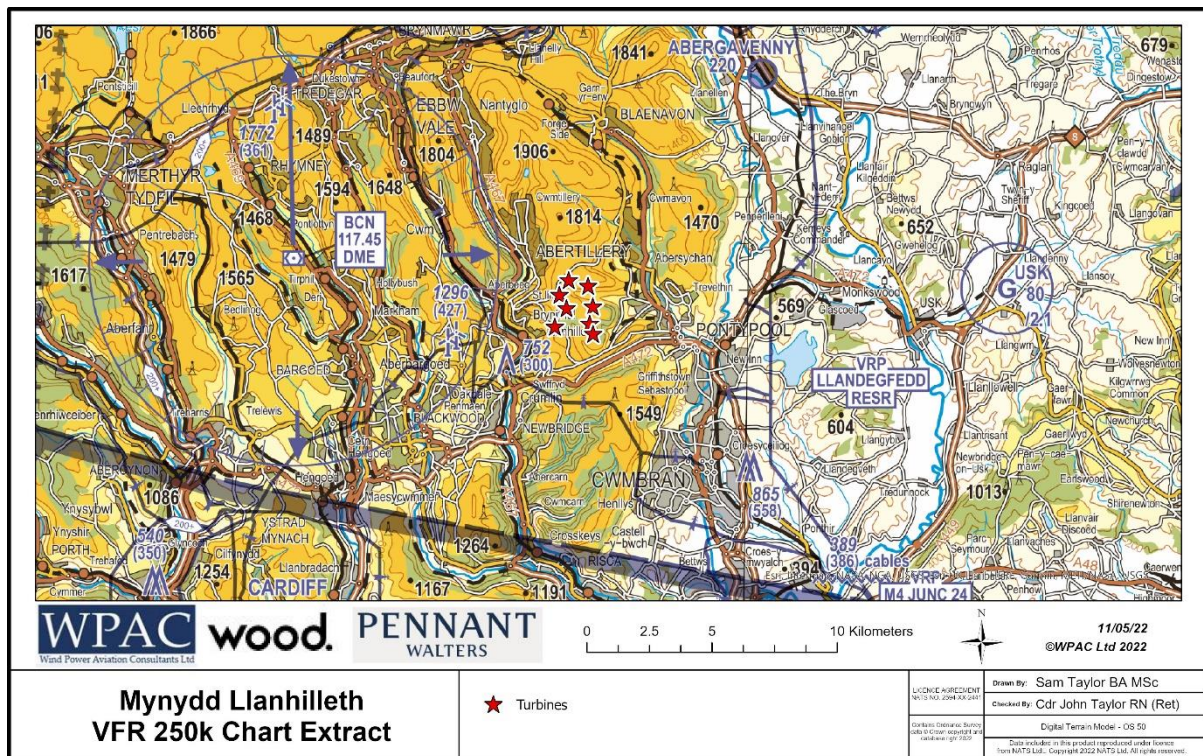


Figure 2



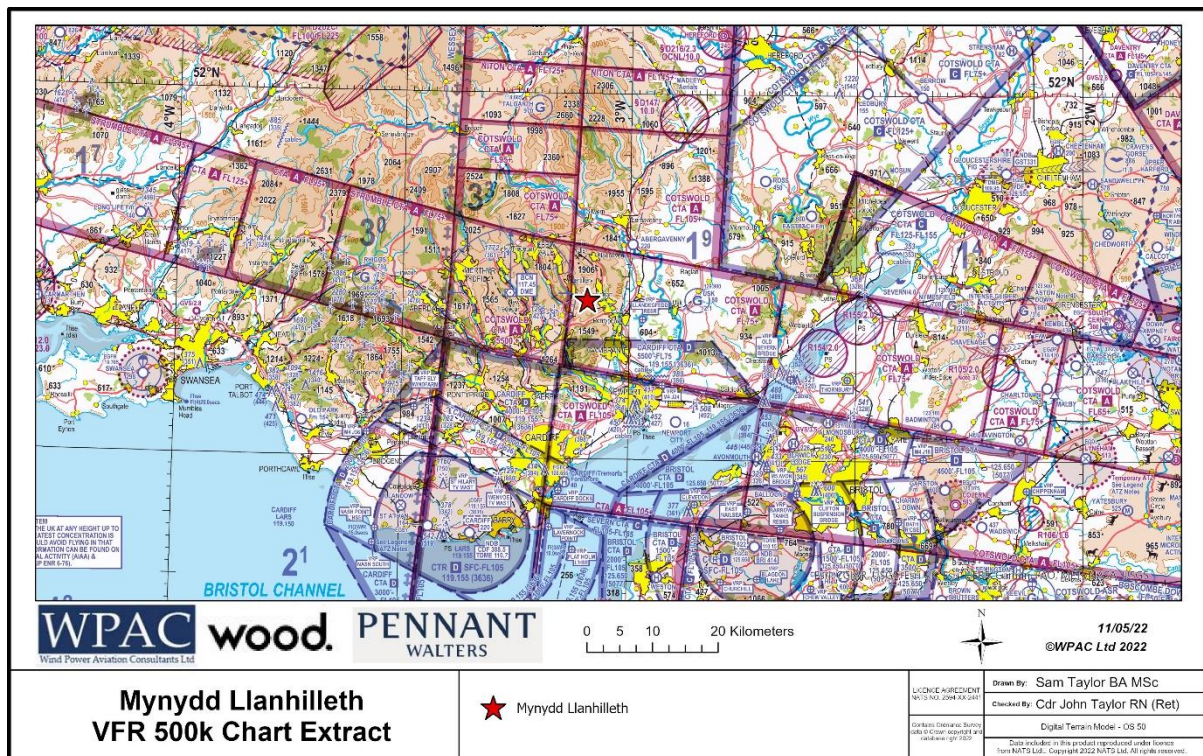


Figure 3

## Aviation Issues

- **MOD** –The closest military ATC radars are at RAF Brize Norton and RNAS Yeovilton. Radar line of sight results for both airfields are shown in Tables 2 and 3. There is an additional MOD ATC radar located at Hartland Point, used at RNAS Yeovilton for training of fighter control students, with aircraft operating over the Bristol Channel and South Wales. The results for Hartland Point are at Table 4.
- The good news is that the turbines will be screened by terrain from all three radars and there will be no MOD ATC radar objection to the proposed development.

Turbine	Radar Sight (metres AGL)	Turbine	Radar Sight (metres AGL)
1	475	5	493.4
2	484.3	6	479.7
3	489.9	7	473.7
4	476.3	8	519

Table 2 RAF Brize Norton

Turbine	Radar Sight AGL)	Line of (metres	Turbine	Radar Sight AGL)	Line of (metres
1	381.5		5	413.1	
2	396		6	416.3	
3	412.6		7	417.4	
4	406.3		8	476.9	

Table 3 RNAS Yeovilton

Turbine	Radar Sight AGL)	Line of (metres	Turbine	Radar Sight AGL)	Line of (metres
1	599.3		5	670.8	
2	565.9		6	699.9	
3	576.8		7	730.8	
4	595.5		8	650.3	

Table 4 Hartland Point Radar

- **Air Defence Radar** – the closest AD radar is at Portreath in North Cornwall. Radar modelling has been undertaken which shows that the turbines will be screened by at least 500 metres by terrain and there will be no MOD AD radar objection.

## Low Flying –

- The Mynydd Llanhilleth site is located well outside of any MOD Tactical Training Areas and examination of detailed MOD low flying charts (not available to the general public) show that the site is not within a choke point or flow arrow within the low flying system. It is also the case that it is located within a 'Green' area as shown in the MOD wind farm low flying chart as shown in the extract at Figure 5.

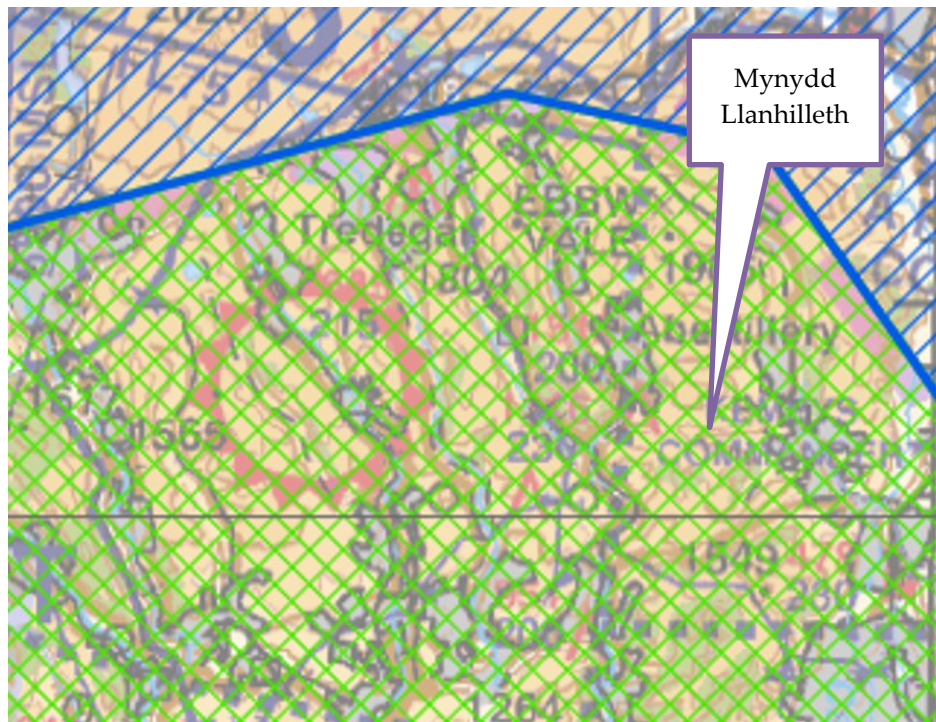


Figure 4 Low Flying Chart Extract

- A Green Area is defined as: '*Areas with no military low flying concerns*'. It is the case that in a green area, low flying does not routinely take place due to other constraints such as population density, airspace or other factors, however, the MOD may raise a 'concern' in order to ensure that the turbines are fitted with Infra-Red obstruction lights which are not visible to the naked eye.
- **Met Office Radars** –In this case the closest Met Office radars are at Crugg Y Goryllwynn and Clee Hill. The Met Office will only become concerned where turbines are likely to be in line of sight of their radars within 20km. Both of these radars are well beyond that distance. Crug Y Goryllwynn is over 94km to the west.

## Civil Radar Equipped Airports

- **Cardiff Airport** – Cardiff is a busy airport 38 km to the south-west. Radar modelling has been undertaken with the results shown in Table 5. Every turbine will be visible to the radar and the proposed development will create a large area of radar clutter and other effects such as track obscuration over the site on the displays at the airport.



Turbine	Radar Line of Sight (metres AGL)	Turbine	Radar Line of Sight (metres AGL)
1	44.7	5	90.7
2	111.6	6	90.3
3	121.5	7	99.6
4	46.8	8	104.1

Table 5 Radar Line of Sight for Cardiff Airport Radar

- The situation at Cardiff is slightly confusing in as much as NATS Services PLC (NSP) provide ATC services to Cardiff Airport under contract. The airport is owned and operated by the Welsh Government and Cardiff Airport is the CAA license holder and responsible for the safe operation of the airport. In this case, at a distance of over 38km and clear of their control zone it could be argued that the effect would be manageable, it is certainly operationally marginal. However, I anticipate that Cardiff will object to the proposal. Cardiff have in the past shown themselves willing to accept the impact of a number of wind farms on their radar, but they are becoming concerned about the cumulative effect of a number of wind farms in the area on their ability to provide a full radar service. It is also the case that Cardiff provides a Lower Airspace Radar Service (LARS) to aircraft operating clear of controlled airspace up to 10,000ft and this service would also be affected by the clutter generated by the turbines.
- The issue then is likely to be the availability of a technical solution, or mitigation. The radar at Cardiff is a Thales Star 2000 which has no wind farm mitigation capabilities, however, a number of other wind farm developers are in discussion with Cardiff about funding the provision of a Terma Scanter 4002 radar which is wind farm capable. This type of radar has already been installed at a number of locations in the UK including Glasgow (also a NATS ATC service contract), Edinburgh, Newcastle and Liverpool. The radar can be located at Cardiff Airport and integrated into the ATC radar display system. It would therefore be sensible to approach Cardiff Airport in order to agree a planning condition contingent upon the provision of a Terma radar. Another developer is already likely to fund the radar and then recover costs from other developers who wish to make use of it. It will be important to gain Cardiff and NATS agreement for this approach but it should be considered as non-contentious and it is certainly not a risk from a technical perspective as this type of radar is already installed and working elsewhere in the UK as a wind farm mitigation system. It will require an approach to both NATS as the service provider and Cardiff Airport as the license holder.
- To conclude:** the turbines **will be visible to the Cardiff radar**, they are likely to maintain an objection and mitigation is likely to be available. The proposed development is well within the coverage of the Terma radar. The only issue will become one of affordability. The action required is to set up a meeting with Cardiff/NATS in order to enable a condition to be agreed.



- **Bristol Airport** – the site is also only 45km from Bristol Airport. Radar modelling has been undertaken with the results in Table 6. The results show that the turbines will all be visible to Bristol Airport's radar. It is possible that Bristol will be able to tolerate the effect, but the turbines will certainly create clutter on the displays. Bristol will need to be consulted, see below.

Turbine	Radar Line of Sight (metres AGL)	Turbine	Radar Line of Sight (metres AGL)
1	0	5	79
2	65.1	6	100.7
3	80.5	7	107
4	78.1	8	145.6

Table 6 Radar Line of Sight Bristol Airport

- **Light Aircraft Landing Strips, Gliding and Microlight Sites** – none marked on charts or known within the defined consultation distances. The closest is at Abergavenny, over 10km to the north-east and well beyond the 3km consultation distance. There is also a gliding site at Usk, but at a distance of over 17km consultation is not required.
- **NERL** – this is where things can get slightly confusing – NERL is NATS En Route Ltd, a separate organisation to NATS Services Ltd (variously called NSL or NSP) although they are clearly connected. NERL provides ATC services mainly in the 'en route' environment using a network of radars, radio stations and navigation aids. The radars are networked together and utilised by controllers at the London Centre at Swanwick in Hampshire. There are two radars that cover this area at low level, Clee Hill in Shropshire and Burrington in Devon; radar modelling has been undertaken for both radars. In the case of Burrington there is no radar line of sight below 500 metres. The results for Clee Hill are shown in Table 7. These results are very unfortunate as every turbine will be visible to the radar in what NERL will consider to be a key area for radar coverage. An objection is very likely.

Turbine	Radar Line of Sight (metres AGL)	Turbine	Radar Line of Sight (metres AGL)
1	93.1	5	113.1
2	99.1	6	109.8
3	116.7	7	91.7
4	111.6	8	173.6

Table 7 Clee Hill Radar

- It is likely, therefore, that mitigation will be required. This may not be a simple fix in this location. In order to confirm the NERL/NATS position, the first action will be to instruct NERL to undertake a combined Technical and Operational Assessment (TOPA). This will capture Clee Hill, Cardiff and Bristol in a single report. Once NERL have confirmed that they will object in relation to Clee Hill it will then become necessary to engage with them to explore mitigation options, but in this area they are very limited. It may be possible they will agree just to blank out the turbine clutter, however, I consider that to be unlikely and I anticipate they will require an infill radar. Whether coverage from Burrington will be considered sufficient, it is difficult to say, that is their call to make. The Burrington is tilted up for technical reasons, so its low level coverage is quite poor in this area. At this stage you should consider the effect of the proposed development on the Clee Hill radar to be a significant risk until NERL confirm that it isn't.

## Aviation Lighting

- With turbines in excess of 150 metres to tip there is a requirement to illuminate them with medium intensity red obstruction lights on the nacelle. There is also the requirement to provide IR lighting for the MOD. WPAC design lighting layouts to minimise the number of lit turbines and gain MOD and CAA approval. There is also a requirement for mid mast lights, halfway up the tower. These are low intensity red lights but are very poorly designed and often have a greater visual impact than the hub lights. Where feasible WPAC can negotiate a waiver to this requirement with the CAA. Finally we provide a full lighting report which includes calculations of the effect of the lights on designated viewpoints which is used to inform the LVIA. We are currently working with Wood on a number of sites in Scotland where this work is being undertaken.

## Conclusion

- **MOD ATC Radar** – no radars affected
- **MOD Low Flying** – the site is in a Green area and an MOD low flying objection is extremely unlikely
- **MOD Air Defence Radar** – none affected
- **Met Office Radar** – none affected
- **Light Aircraft Landing Strips** – none to affect
- **Civil Airports** – the turbines will all be visible to Cardiff Airport radar and technical mitigation will be required. The turbines will also be visible to Bristol Airport radar which may generate a second objection, although this is less likely.
- **NERL** – all the turbines will be visible to the Clee Hill radar. NERL will object due to the location and mitigation will be required. This should be considered a serious risk to the success of this development.

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## Next Actions

- Instruct NERL to undertake a COMBINED TOPA to capture Clee Hill, Cardiff and Bristol Airport radars. Use the following link: <https://www.nats.aero/services-products/services/wind-farms/wind-farms-pre-planning-assessment/wind-farms-payment/> it is a very simple process.
- Discuss mitigation options with Cardiff, it should be possible to agree a planning condition to mitigate by utilizing a Terma Scanter 4002 radar which another developer wants to fund as a mitigation for a wind farm.
- Discuss mitigation options with NERL. This is a more difficult discussion because there is no obvious solution if an infill is required. One possibility I have thought up would be to feed the Terma radar at Cardiff into the NERL multi radar tracking (MRT) system at Swanwick, then blank out the clutter on the Clee Hill and infill with Cardiff Terma. This is not a simple or cheap solution as the NERL requirement will be more demanding than the Cardiff Airport requirement. It is also not known if the NERL MRT has the capacity to accept an additional feed.
- There are two sets of discussions under way at the moment. In the first, a developer group seems to be forming to drive through the Terma mitigation for Cardiff Airport, although I think the airport will be waiting for the outcome of the Upper Omore decision before deciding to proceed with suspensive conditions. This group is being started by Sam Johnson at RES. I would also caution that developer groups that don't have any aviation expertise can sometimes become overly optimistic or misunderstand the technical issues, leading to unjustified optimism. The second set of discussions is in relation to other developers who are having problems with the Clee Hill radar and are seeking a mitigation solution. NERL are trying to engage with the Welsh Government on this issue, but it is early days. As things stand, unless NERL are able to just accept a blank in this location, there is unlikely to be a mitigation for Clee Hill in the near future.
- Lighting – aviation lighting will be required and a lighting design and impact assessment undertaken to both minimise the visual effect and to inform the LVIA.



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