

11. **Aviation Issues**

This section comprises 4 sub-sections:

- 11.1 MoD, CAA & NATS en route (NERL)
- 11.2 The Need for Low Flying Training
- 11.3 The Devon Air Ambulance
- 11.4 The Accident Waiting to Happen

11.1 **MoD, CAA & NATS en route (NERL)**

11.1.1 In Table 12.1 in paragraph 12.2.1 of the Environmental Statement Bolsterstone states that NERL has made 'No Objection'. This is untrue. **NERL has objected to this application in its consultee response from Sarah Allen, Technical Administrator, dated 24th December , 2008. For this reason alone this application must be refused.**

11.1.2 The Defence Estates Safeguarding division of the MoD requires that the turbines must be lit. DTOG's comments on this have already been made in Section 3.4: The Visual Impact: Lighting of Turbines. They relate to light pollution and epilepsy.

11.1.3 The Directorate of Airspace Policy of the CAA has specified that the turbines must be painted white to increase their daytime visibility. This renders the light grey turbines shown in all of the photomontages inadmissible because they mis-represent the reality of the visual impact. This consultee has also identified that there might be a need for lighting the turbines.

**11.1.4 Recommendation: REFUSAL
NATS en route (NERL) has objected to this application. For this reason alone this application must be refused.**

11.2 **The Need for Low Flying Training**

11.2.1 Dunsland Cross is very much involved with the low flying training of Royal Navy and Royal Air Force pilots. UK pilots and guest pilots from foreign forces are involved in the exercises which are a common occurrence in this area. Low flying jet fighters, helicopters and Hercules Transport planes from RAF Lyneham are seen regularly crossing the wind farm site at low level. As if to make the point, at 1510 on Friday 24th October, 2008, two fast jets flew over the site at low level - just 50 minutes before the start of Bolsterstone's public exhibition at Bradford and Cookbury Village Hall.

11.2.2 In the foreword to the draft version of *'The Citizens Charter for Low Flying Military Aircraft'* (November 1996) the Inter Authority Working Group on Low Flying stated:

'The Royal Air Force and our allies are required to provide well trained armed forces which can defend British interests and those of other Nations if the need arises.

Low Flying Military Aircraft use UK air space for practical training in radar avoidance techniques which in times of war allow military missions to be staged with the best chance of military success and with a reduced risk of losses of pilots or aircraft.

Low Flying skills need to be practised regularly and a sufficient level of pilot competence cannot be achieved using simulators on their own.'

The conflicts in The Falkland Islands, Iraq and Afghanistan bear testimony to this need.

11.2.3 The whole of the UK is now a Low Flying Zone. Aircraft may operate at heights between 250 ft (76 metres) and 100 ft (30 metres), well below the proposed turbine height for Dunslund Cross (105 metres). As more and more small wind farms appear across the countryside the requirement for military training aircraft to avoid them or vacate certain areas increases. If accidents are to be prevented it makes more sense to have a small number of large wind farms rather than a large number of small ones. That the proliferation of wind farms is becoming an aerial hazard is recognised by the forthcoming change in legislation requiring all structures over 70 metres tall to be lit with aircraft collision avoidance lights.

11.3 The Devon Air Ambulance

11.3.1 Helicopter air ambulances are an indispensable service in a rural county like Devon. World wide, such services are now recognising the problem of landing helicopters near wind farms. The Devon Air Ambulance Trust (DAAT) should be a consultee in this application process. This point has been made in the response of the Directorate of Airspace Policy of the CAA to this application:

'I should add that due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would be sensible to establish the related viewpoint of local emergency services air support units.'

(Mark Smalles, Off Route Airspace 5, Consultee response.)

11.3.2 The air ambulance last attended a road traffic accident on the A3079 near Dunslund Cross on Friday, 22nd June, 2007. It landed in the field opposite Little Copse (see Photo 13 below). In a separate RTA on the A3079 previous to that incident, the air ambulance landed at the point where the developer intends to remove 40 m of hedgrows for a new site entrance.



Photo 13

11.3.2 Some Air Ambulance services are now refusing to land near wind farms. The Wisconsin branch of the American Flight For Life organisation is one as the notice in Figure 27 below shows. If an accident were to occur on the A3079 or A3072 next to the wind farm site, as may well happen if driver distraction occurs (see Section 6.7), the air ambulance would not be able to land in the wind farm field itself as it would be too dangerous.

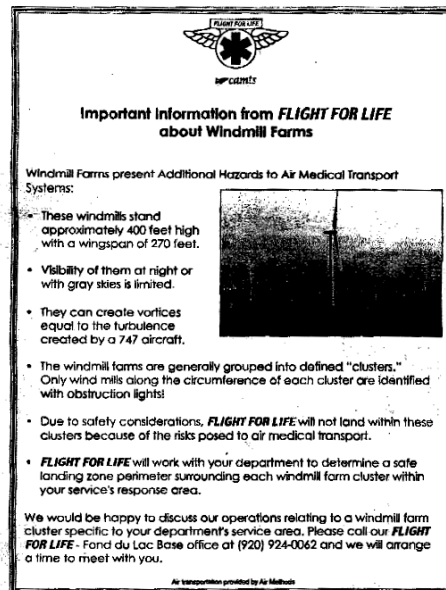


Figure 27

11.3.3 Recommendation: **CONDITION** **Planning permission for the wind farm should not be granted until DAAT has been consulted and a consultee response has been received.**

11.4 The Accident Waiting to Happen

11.4.1 DTOG has been advised with regard to military training involving low-flying by Lt. Cdr. Peter Sheppard, A.F.C., R.N. (retd.), who lives close to the proposed wind farm site. Cdr. Sheppard has been involved in pilot training in this area for many years and knows first-hand the problems pilots face in avoiding collisions whilst taking part in high-speed, low-level training exercises.

11.4.2 The dangers are real. Aircraft collisions have occurred in the Dunslund Cross/ Holsworthy area during military exercises requiring pilots to bale out. In the heat of the 'combat' there are many distractions to trainee pilots who, as well as looking out for other aircraft in the exercise, have just seconds to notice and avoid natural and man-made obstacles in their way. They do not always get it right. On Thursday, 29th May, 2008, two army pilots died when their Squirrel helicopter hit power lines near Kingscott, Torrington, in Devon. The story was reported in most media. The BBC report said, 'It is believed the helicopter was taking part in a routine low-flying training exercise.' (<http://news.bbc.co.uk/1/hi/england/devon/7426231.stm>)

11.4.3 If the Dunslund Cross Wind Farm application is approved, DTOG feels that there will be an accident just waiting to happen.

11.4.4 On its website for the Dunslund Cross Wind Farm, in the section entitled, 'About Dunslund Cross' (www.dunslundcrosswindfarm.co.uk/about.asp), Bolsterstone seeks to explain why Dunslund Cross is 'a great location for a wind farm'. The second reason given is:

'No aviation issues.'