

## 'Onshore Wind Policy Statement Refresh 2021: Consultative Draft'

Scottish Government

*Written submission by NATS.*

**Consultation reference:** Onshore Wind Policy Statement Refresh 2021

**Closing date:** 31<sup>st</sup> January 2022

### 1. Introduction

1.1 NATS is the UK's leading air navigation services organisation providing, under licence, en route air traffic management services over the UK and eastern North Atlantic from centres at Swanwick, Hampshire and Prestwick, Ayrshire. We are also contracted to provide air traffic control services at 14 major UK airports, and operate in over 30 countries around the world.

1.2 Airspace is a critical pillar of UK national transport infrastructure supporting the wider economy. It enables the safe and efficient passage of aircraft, which provide connectivity for passengers and goods with countries around the world.

1.3 NATS agrees that onshore wind is already proving to be an important contributor to net zero – to which we are also fully committed and already undertaking work to achieve. Safety is always our first priority, and we want to support the growth of this important capability in a safe and efficient way. Our responses to this consultation are limited only to the aviation focused questions and are based upon real and practical experience of working with developers and seeking to develop just, fair, equitable and cost-effective solutions to integrate them and other new airspace users safely into UK airspace.

### Chapter 3: Barriers to deployment: Technical and Reserved matters

#### Annex 2

**2. We are clear on the value and importance of strategic and productive collaboration between the aviation and wind energy sectors. What are your thoughts on our proposed restructuring of the current effort and activity in this area, and the proposed Aviation and Renewables Collaboration Board?**

2.1 Airspace is a crucial part of the UK's critical national infrastructure which we are responsible for managing safely, so this is the primary lens through which we approach this issue. We support the aims of the renewable energy industry and have been supportive of Scottish Government initiatives like the Aviation 2030 Taskforce, and we agree that a collaborative approach will be ever-more necessary given the desired scale of developments and the impact they could have on aviation safety. NATS has extensive experience of working with developers and dealing with a variety of different types of development and the associated challenges. Any government mechanism that could overcome barriers to a collective and collaborative approach would have our complete support.

2.2 Windfarms can have adverse technical and operational impacts on the aviation operation, the main issue being that wind turbines cause 'clutter' on radar screens which prevents an accurate picture being presented to air traffic controllers, thereby creating an unsafe environment. They can also adversely impact Instrument Flight Procedures, Instrument Landing Systems and VHF radio, as well as secondary surveillance radar. These cumulative adverse effects are identified in the Civil Aviation Authority's 'CAP764: Policy and guidelines on wind turbines'. All of these issues and the risks they present need to be considered and addressed by both the aviation and renewables industries in a collaborative manner.

2.3 It should also be noted that the CAA is currently consulting on an update to CAP764, so any change to the Scottish Government's onshore wind policy should be cognisant of and align with this update where possible.

2.4 The consultation document states that responsibility for mitigation should transition from the renewables to the aviation sector. It is important to emphasise that this is not currently possible as the technological solutions available for dealing with the adverse impacts of windfarms require significant investment and the costs should not be borne solely by aviation stakeholders.

2.5 Air Navigation Service Providers (ANSP) such as NATS are not funded to make the changes required to mitigate windfarms. As a licensed ANSP NATS is required to safely manage air traffic using surveillance tools such as radars. The customers of that service i.e., airlines, cannot be expected to pay for the mitigation of a deterioration in that service caused by a third-party commercial development.

2.6 While future technological developments in radar systems may redistribute the balance of responsibility between aviation and renewables, they are not yet available and may not be for some time. Any 'transition of responsibility' is not realistically possible until that time. Funding of solutions therefore needs to reside somewhere other than the ANSP – either with the windfarm developer or through a central fund.

2.7 Some developers have recognised this fact and have been active in finding pragmatic solutions – for example, there are several schemes which are developer led and funded, which utilise pay-back models over the next 15-20 years to spread the costs of mitigation.

2.8 Given all of the above, we agree with the principle of an Aviation and Renewables Collaboration Board to facilitate productive collaboration.

2.9 It should be noted, however, that there already exist several working groups, for example those run by the UK Government which have similar aims, so we strongly urge a review of existing groups and their aims and ambitions, to avoid duplication. ANSPs do not have enough resource to deal with the many varying tactical issues and associated workstreams, so it is important that synergies are sought where possible.

2.10 Alignment between the Scottish and UK Governments on the aims of these working groups would enable ANSPs such as NATS, other aviation stakeholders and key agencies which are accountable for operations and/or safety, to better focus resources and enable a UK-wide, synergistic, and collaborative approach.

**3. The work of the Aviation and Renewables Collaboration Board may identify and agree the need for technical or strategic investment to achieve specific goals or outcomes. What are your views on how work of this kind might be financed?**

3.1 NATS supports the Scottish Government's initiatives to enable GW release, and the overall aims of this policy direction. As noted previously, however, any proposed/suggested transition of responsibility is not currently possible, and a collaborative approach will be needed to deliver the targets set out in this policy.

3.2 The funding of solutions should not be expected of aviation stakeholders. As set out in planning policies, the impact of developments must be addressed by the party sponsoring the development i.e., the user-pays principle. In the case of windfarms, aviation stakeholders should not be required to invest in resolving impacts from third party commercial activities.

3.3 A potential solution could be for a central fund to be established by the Scottish Government to provide funding for mitigation solutions. This could be funded through a development levy based on MW release, enabling a centralised mitigation pot to be created. This would remove the main source of friction between the aviation and renewables industries and enable further productive collaboration.