

**Email to:** windfarms@caa.co.uk

22 May 2024

To Whom It May Concern,

**Response to CAP 764 Wind Turbine Policy Consultation (Released March 28, 2024)**

Scottish Renewables (SR) is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent 360 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe, and around the world, ranging from energy suppliers, operators, and manufacturers, to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

Scottish Renewables is supportive of the proposed revision to CAP 764: CAA Policy and Guidelines on Wind Turbines. The new chapters that have been added are helpful to the wind industry.

We are pleased that the introduction indicates that stakeholders should be responsible for assessing proposed developments under aerodrome safeguarding requirements to consider potential impacts and that 'suitable mitigation solutions are developed and applied only where absolutely necessary'. While mentioning that aviation stakeholders provide input into the relevant planning process is also positive, we would encourage you to strengthen this statement by using meaningful and evidenced- based input. We believe that this point is also tempered by the position that the CAA affirms that an ANSP, aerodrome or aircraft operator best knows its service environment and safeguarding requirements.

We are very supportive of the recognition of net zero and the importance of the aviation industry co-existing with the wind industry. Safety in the air is paramount, and the CAA should continue to provide the right guidance and oversight to good practice whilst also ensuring that mitigation approaches are 'practicable and cost effective' for the wind energy and aviation industries. We would expect the CAA to ensure that an aerodrome complies with Aviation Law & Regulations.

The CAA's role helps facilitate the process and conversation between the relevant stakeholders and we are interested to see that the guidelines state that CAA will be taking on an auditing role in the safeguarding aerodromes and ANSPs with en-route CNS infrastructure. We see the CAA as having the role of regulator, guider, and auditor of the UK aviation industry.

In section 2.39a. we would encourage the first sentence to be amended to say, 'to allow aircraft to depart the airport on prescribed routes, under Instrument Flight Rules (IFR) that allow them to integrate into the en-route airspace structure' and the acronym 'RNP' expanded in its first mention.

We are supportive of the section of the Aircraft Detection Lighting Systems (ADLS) section, and we would encourage you to mention it in the glossary. It is also of note that there is no mention of other mitigation techniques that are not radar related. It would be useful to mention those that could be applied for ATS provision as well. In the glossary, we would also welcome the mention of IFR – Instrument Flight Rules, MOR – Mandatory Occurrence Report, and IMC – Instrument Meteorological Conditions.

We would like to see section 5.2 amended to include 'safety conduct essential Instrument Meteorological Conditions (IMC) procedures to such facilities in a Degraded Visual Environment (DVE) (low cloud and visible conditions)'. In section 5.3 we would like to know where the 'UK Pollution Control Zone' information is held and whether this falls under the Clean Air Zones.

Overall, we were happy to see the amendments and additions to the policy and guidelines, and we will continue to provide support were needed to its members and the CAA. Separately, we would like to see the CAA take a similar approach as it has taken with the CAP 764 to creating a joined-up approach to other issues such as the Air Space Modernisation Strategy and proactively engaging the wind industry and renewables sector when it consults the aviation sector.

Sincerely,



Megan Amundson  
**Head of Onshore Wind & Consenting  
Scottish Renewables**