



# Defence Infrastructure Organisation

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Your reference: 4/24/2302/OF1

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Christopher Harrison  
The Market Hall  
Market Place  
Whitehaven  
Cumbria  
CA28 7JG

15 April 2025

## By email only

Dear Christopher,

Application Reference:	<b>4/24/2302/OF1</b>
Site Name:	<b>Stubsgill Farm Repowering</b>
Proposal:	<b>Removal of Existing Wind Turbine and Erection of a Replacement Turbine up to 76 Metres Blade Tip Height, with Associated Development.</b>
Site address:	<b>Stubsgill Farm, Distington to Parton, Distington.</b>

Thank you for consulting the Ministry of Defence (MOD) in relation to the planning application through your communication dated 3 April 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to tell you that, subject to the conditions detailed in Appendix A, the MOD has no objection to the proposed development.

The application concerns the replacement of an existing turbine with a new turbine at a height of up to 76 metres above ground level to blade tip with associated development. The development has been assessed using the location data (Grid References) provided in the developers document 'Stubsgill Farm Wind Turbine Repowering Planning Statement', dated August 2024 and 'Stubsgill Site Plan, Drawing no. 3369-091-SP-002', dated 30 May 2024.

Turbine no.	Easting	Northing
1	301884	523322

The principal safeguarding concern of the MOD with respect to this development is the erection of wind turbines and relates to the potential of the turbines creating a physical obstruction to air traffic movements.

### **Physical Obstruction**

In this case the development falls within Low Flying Area 17 (LFA 17), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above terrain features to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

To address this impact, and given the location and scale of the development, the MOD request conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction. Suggested condition wordings are set out in Appendix A.

As a minimum the MOD would require that the turbine is fitted with MOD accredited Infra-Red (IR) lighting.

### **Summary**

Subject to the condition requested above and provided in Appendix A, the MOD has no objections to the development.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's "Stubsgill Farm Wind Turbine Repowering Planning Statement", dated August 2024 and "Stubsgill Site Plan, Drawing no. 3369-091-SP-002", dated 30 May 2024. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

**MOD:** <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely,

*Andy White*

Andy White  
Assistant Safeguarding Manager

(Appendix A enc)

## **Appendix A**

### **Condition - Aviation Lighting**

Prior to commencing construction of any wind turbine generators, or deploying any construction equipment or temporal structure(s) 50 metres or more in height (above terrain features) the undertaker must submit an aviation lighting scheme for the approval of Cumberland Council in conjunction with the Ministry of Defence defining how the development will be lit throughout its life to maintain civil and military aviation safety requirements as determined necessary for aviation safety by the Ministry of Defence.

This should set out:

- a) details of any construction equipment and temporal structures with a total height of 50 metres or greater (above terrain features) that will be deployed during the construction of wind turbine generators and details of any aviation warning lighting that they will be fitted with; and
- b) the locations and heights of all wind turbine generators and any anemometry mast featured in the development identifying those that will be fitted with aviation warning lighting identifying the position of the lights on the wind turbine generators; the type(s) of lights that will be fitted and the performance specification(s) of the lighting type(s) to be used.

Thereafter, the undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. The lighting installed will remain operational for the lifetime of the development.

#### Reason for condition.

To maintain aviation safety.

### **Condition - Aviation Charting and Safety Management**

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the erection of wind turbine generators;
- b) the maximum height of any construction equipment to be used in the erection of the wind turbines;
- c) the date any wind turbine generators are brought into use;
- d) the latitude and longitude and maximum heights of each wind turbine generator, and any anemometer mast(s).

The Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements and of the completion of the construction of the development.

#### Reason for condition.

To maintain aviation safety.