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Your reference: H03-0910-26

Our reference: DIO11327

Mark Niland
South Holland District Council
Council Offices
Priory Road
Spalding
Lincolnshire
PE11 2XE

06 November 2026

By email only

Dear Mark,

Application reference:	**H03-0910-26**
Site Name:	**Bank House Farm Wind Turbine**
Proposal:	**Erection of replacement wind turbine**
Site address:	**Bank House Farm, The Delph, Pode Hole, Spalding, PE11 3JH.**

Thank you for consulting the Ministry of Defence (MOD) in relation to the above planning application.

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 advise you that the MOD **objects** to the proposal.

The application concerns the construction of a single turbine with maximum blade tip height of 54.5 metres (m) above ground level (agl). The turbine, subject of this application, is intended to replace an existing operational turbine with a blade tip height of 45m agl, therefore introducing an increase to the height of the existing turbine by 9.5m. The development has been assessed using the location data (Grid Reference) below provided on the applicant's drawing 'Proposed Site and Location Plan – A1', dated July 2026.

Turbine no.	Easting	Northing
1	518548	321145

The principal safeguarding concerns of the MOD with respect to this replacement wind turbine and the increase in overall height relate to the detrimental effects the replacement turbine will have on the performance of radar systems used to manage air traffic and the potential for the turbine to create a physical obstruction to air traffic movements.

Air Traffic Control (ATC) Radar

The turbine will be 54.4km from, detectable by, and will cause unacceptable interference to the ATC radar used by RAF Marham.

The turbine will be 25km from, detectable by, and will cause unacceptable interference to the ATC radar used by RAF Wittering.

Wind turbines have been shown to have detrimental effects on the performance of Primary Surveillance Radars. These effects include the desensitisation of radar in the vicinity of the turbines; shadowing and the creation of "unwanted" aircraft returns which air traffic controllers must treat as aircraft returns. The desensitisation of radar could result in aircraft not being detected by the radar and therefore not presented to air traffic controllers. Controllers use the radar to separate and sequence both military and civilian aircraft, and in busy uncontrolled airspace radar is the only sure way to do this safely. Maintaining situational awareness of all aircraft movements within the airspace is crucial to achieving a safe and efficient air traffic service, and the integrity of radar data is central to this process. The creation of "unwanted" returns displayed on the radar leads to increased workload for both controllers and aircrews. Furthermore, real aircraft returns can be obscured by a turbine's radar return, making the tracking of both conflicting unknown aircraft and the controllers' own traffic much more difficult.

An operational assessment of this proposal has been conducted by an ATC subject Matter Expert (SME) who considered the position of the turbine weighed against a number of operational factors. Close examination of the proposal has indicated that the proposed turbine would have a significant and detrimental effect on operations and on the provision of air traffic services at RAF Marham and RAF Wittering.

MOD therefore **objects** to this development. In addition to the previous paragraph, reasons for this objection include, but are not limited to:

a. Restrictions the development would impose upon departure, arrival and transit routes, including LARS, low flying, visual reporting points and airfield entry/exit flow points.

b. Restrictions the development would impose upon Instrument holding procedures and other holding areas.

c. Restrictions the development would impose upon the Radar Training Circuit.

Physical Obstruction

In this case the development falls within Low Flying Area 6 (LFA 6), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level 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.

If the developer is able to overcome the Air Traffic Control issues stated above, to address the impact up on low flying given the location and scale of the development, the MOD would require a

condition to be added to any consent issued requiring that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

Summary

The MOD **objects** to this proposal for the following reasons:

- the turbine proposed would have detrimental effects on the performance of the Primary Surveillance Radars at RAF Marham and RAF Wittering; and
- the development would introduce a potential physical obstruction to air traffic movements.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above/in the developer's documents titled 'Planning Supporting Statement', dated September 2026, 'Proposed Elevations - A1', dated July 2026 and 'Proposed Site Plans - A1', dated July 2026. 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 website:

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

Yours sincerely,

Kathe Kirimaa

Kathe Kirimaa
Assistant Safeguarding Manager