



Aviation Supporting Statement

Dubbers

Report

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Introduction

Overview

1. Clean Earth Energy propose to erect two wind turbines in the vicinity of Cornwall Airport, Newquay (CAN). The proposed site, known as Dubbers, is situated on the final approach path for Runway 30 approximately 7nm (12.95km) from the Aerodrome Reference Point (ARP).
2. The proposed development consists of two wind turbines with a tip height of up to 135m.
3. Clean Earth have been involved in extensive correspondence with CAN since July 2019, when investigations were started to indicate the suitability of further turbine development in the China Clay Area.
4. In response to initial concerns from the CAN Air Traffic Control team in regard to the proposed turbine locations and in a spirit of collaborative data gathering, Clean Earth commissioned third party aviation consultants to advise and to conduct assessments that considered comments raised by CAN.
5. Upon completion of these exercises, Clean Earth and CAN concluded technical discussions in March 2020. CAN accepted the suitability of multiple turbine developments within the China Clay Area, contingent upon turbine height restrictions and Clean Earth's commitment to inform the Airport ATC team if any material changes to future proposals arise that deviate from the previously agreed locations on which the reports were based.
6. Clean Earth are now proposing to add two additional wind turbines within the China Clay Area, in the same location which has been considered within all aviation reports.
7. The UK Civil Aviation Authority requires that where there is a potential for an obstacle to impact an airport's operations and the safety of flying aircraft, an aeronautical study be conducted. Clean Earth arranged for these to be conducted in line with UK Civil Aviation Authority (CAA) regulations, the European Aviation Safety Agency (EASA) and the International Civil Aviation Organisation (ICAO).
8. Cyrrus Ltd conducted these assessments as an Approved Procedure Design Organisation and accepted by the UK Civil Aviation Authority (CAA).
9. Straten Consulting has assessed the proposed site against previous assessments to determine whether the proposed wind turbine falls within the height consideration. The purpose is to determine if the Airport would be impacted as a result of the sited wind turbines.



Location

10. Figure 1 indicates the site location relative to the Airport and Figure 2 indicates the turbine site in a zoomed in location.

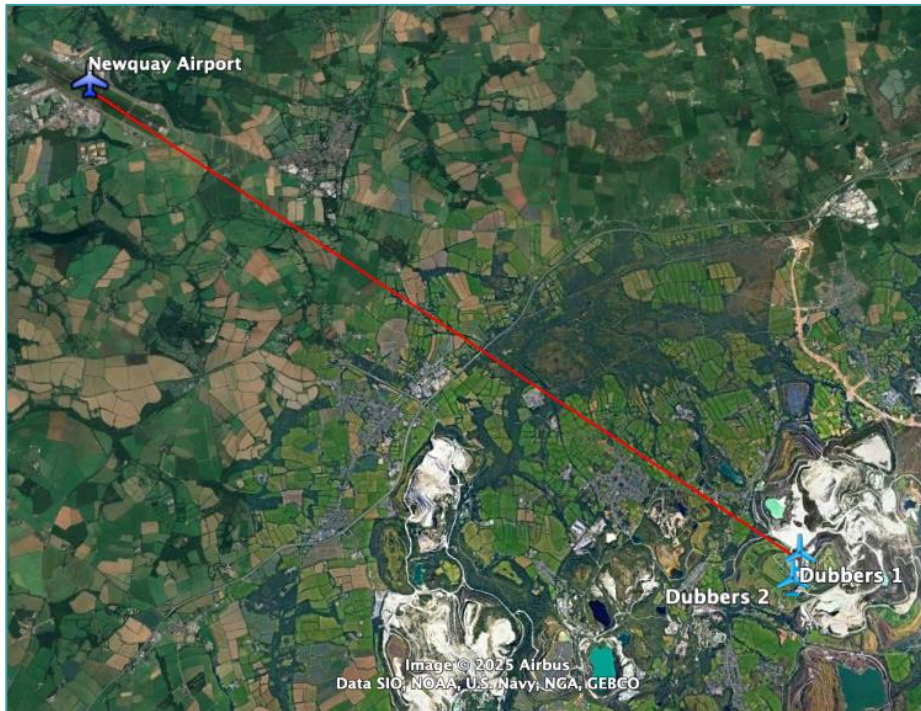


FIGURE 1: SITE LOCATION RELATIVE TO THE AIRPORT

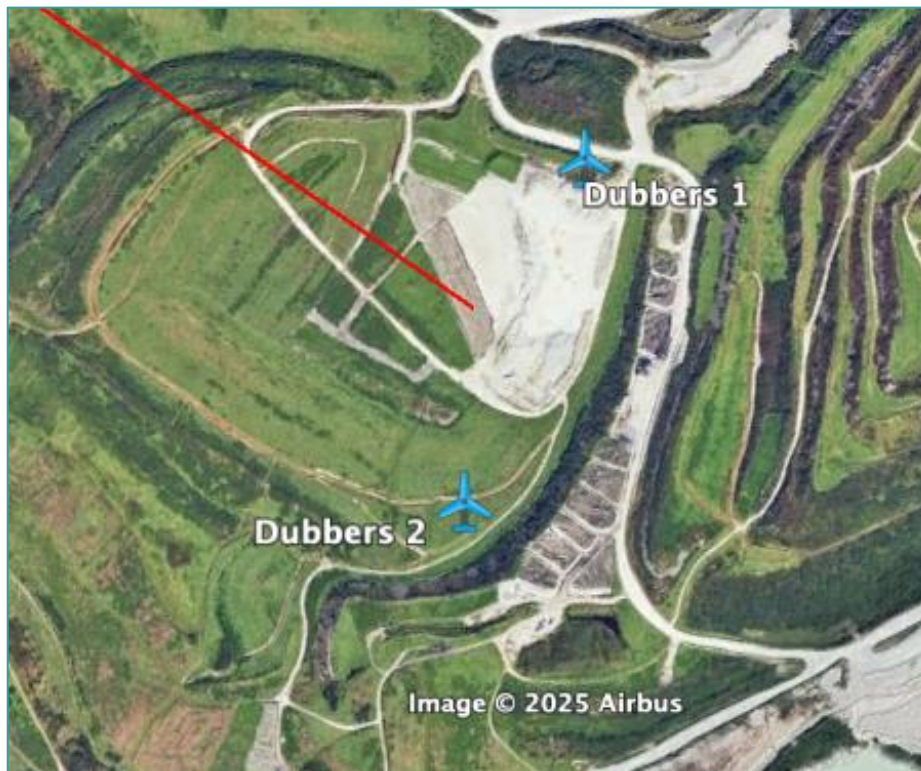


FIGURE 2: SITE LOCATION



Summary

11. Cyrrus conducted a series of aviation assessments and an Aeronautical Study to consider the potential impact the proposed wind turbines may have to the Airport, Airspace, and aircraft operations, these included:

- Two Instrument Flight Procedure (IFP) Safeguarding Assessments:
 - Reference: CL-5436-RPT-002 V1.1, dated 26 November 2019; and
 - Reference: CL-5456-RPT-002 V1.0, dated 20 January 2020.
- Aeronautical Study:
 - Reference: CL5456-RPT-003 V2.2, dated 21 February 2020.
- Technical Safeguarding Assessment:
 - Reference: CL-5456-RPT-004 V1.2, dated 19 March 2020.

12. Straten Consulting performed an updated review of the Instrument Flight Procedures to verify whether any changes had been made since the Cyrrus reports, and to confirm that the IFP designs were current. The results of the review against the latest published procedures in the UK Aeronautical information Publication (AIP), Amendment 09/2025, Effective Date 04 September 2025 and contained in the table below.

Dubbers 1 & 2		
Procedure	Results	Mitigation
ATCSMAC	No impact	Not required
ILS 12	No impact	Not required
LOC 12	No impact	Not required
NDB 12	No impact	Not required
SRA 12	No impact	Not required
ILS 30	No impact	Not required
LOC 30	No impact	Not required
NDB 30	No impact	Not required
SRA 30	No impact	Not required
Holdings	No impact	Not required
MSA	No impact	Not required
VM(C)	No impact	Not required

Summary

13. Straten Consulting is a member of the UK CAA led Combined Airports Safeguarding Team ([CAST](#)) and has reviewed the documentation against current regulatory guidance.



Airport

14. CAN is the only airport that could be impacted by the site. The Airport is licensed by the UK Civil Aviation Authority (CAA). The airport designation is EGHQ, which is the four-letter international code for CAN and as listed in the UK Aeronautical Information Publication (AIP).
15. The Airport identified that wind turbines in the proposed site penetrated the Obstacle Limitation Surfaces (OLS), as a result an IFP Safeguarding Assessment was conducted. This assessment satisfies the requirements of the UK CAA CAP168 with respect to Certification of Aerodromes to consider the impact to safety to airborne aircraft.
16. An IFP Safeguarding Assessment determined that wind turbines, in the identified site, will remain below an elevation of 401m (above mean sea level) in order not to impact the IFPs. The proposed turbine has a tip height of up to 135m at a ground elevation of 257m, resulting in a total elevation of 392m which is well below the 401m restriction. There will be no impact to Airport operations.
17. An Aeronautical Study was conducted to determine the potential impact to aircraft operations using the airspace in the vicinity of site and the Airport. This study focussed on aircraft flying under Instrument Flight Rules (IFR), specifically Commercial Air Transport (CAT) aircraft against Visual Flight Rules (VFR) crossing aircraft. The study concluded no impact.
18. A Technical Safeguarding Assessment was conducted to determine the potential impact the site could have on the Airport's Instrument Landing System (ILS). The assessment determined no impact.

Other Infrastructure

19. There are no impacts to Navigational Aids, radio stations for air-ground-air communications, to any NATS infrastructure or to any UK Met Office weather radar.

Conclusion

20. The assessments undertaken in support of this application categorically show the proposed Wind Turbine located on the proposed site will have no adverse safety impact on the operation or functioning of aviation interests in the area and Cornwall Airport, Newquay.