



13 November 2025

Mr. B Million
Head of Energy Infrastructure Planning
On behalf of the Secretary of State for Energy Security & Net Zero
Darlington Economic Campus
Feethams House
Darlington
DL1 5BF

Dear Mr. Million

**Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010
Application by Enso Green Holdings D Limited ('the Applicant') for an Order granting
Development Consent for the proposed Helios Renewable Energy Project ("the Proposed
Development")**

Planning Inspectorate Application Reference: EN010140

REQUEST FOR INFORMATION

I refer to your letter of 15 October.

Response on behalf of Burn Gliding Club

I write on behalf of Burn Gliding Club (BGC). We wish to respond to the Applicant's Response to the Secretary of State's Request for Information.

In his letter of 26 September, the Secretary of State asked the Applicant to address four issues. These are summarised below with our response.

7a. Clarify how land rights and ownership might affect emergency responses.

The Applicant may be strictly correct that land rights and ownership may not be directly relevant to emergency responses. However, indirectly, the nature of the proposed land use, creating hard surfaces with extensive security fencing and wide areas of woodland designed to minimise the adverse visual impact of the proposed development, would make emergency responses significantly more complex and subject to delays.

7b. *Review / update its assessments of the impact of the proposed development on aviation operations.*

The Applicant has provided a simplified analysis – based solely on the areas of proposed solar panels as a % of the overall area of the relevant zone advised by the CAA. This, however, ignores other land that is currently not available for an emergency – including woodland, farms and farm buildings, residential properties, roads and an overhead power line which runs across the takeoff area from runway 15. The % figures quoted do not properly represent the scale of the loss of land currently available for an aircraft emergency landing.

The Applicant has not properly addressed this question.

7c. *Explain mitigation measures to safeguard against EFATO risk.*

The Applicant confirms it has not included EAFTO (or Ground Launch Failure) into the scheme design as it does not consider this to be a significant risk.

The Applicant states that land available following an engine or launch failure from Runway 19 is unaffected by the proposed development. This is incorrect, however, as part of the Helios site, at Hirst Courtney is within the 90 degree 2km radius zone of Runway 19.

The Applicant states that following an engine or launch failure from Runway 07 ‘... a pilot can remain flying forward...’ Theoretically this might be possible, however, a railway and road lie directly ahead and at 500m from the end of the runway, the nearest solar panels are proposed at slightly over 100m off the centerline.

In respect of Runway 15 the Applicant advocates a right-hand turn – despite in respect of Runway 07 stating that not conducting a similar right hand turn would not be considered ‘best practice’.

In addition, the Applicant has ignored the implications of tug operations. Many glider launches are initiated with an aircraft tow, so there are two aircraft involved – the towing motorised aircraft (tug) and the glider. This combination involves a rope normally of 50-60m in length with the overall length of tug, rope and glider up to 150m.

This underlines the importance of large open areas being available in emergencies.

8c. *Set out the policy or guidance underpinning their approach.*

The Applicant states that the CAA’s Combined Aerodromes Safeguarding Team’s ‘Aerodrome Safeguarding Advice Note 5: Renewable Energy Developments’ does not prescribe a ‘*formal methodology*’ for assessing impacts.



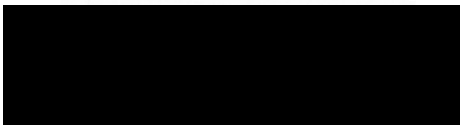
However, 'Policy and Guidance' in EN-1 – the Overarching National Policy Statement for Energy clearly requires that '*...safety, operations and capabilities are not adversely affected by new energy infrastructure.*' (paragraph 5.5.5). In addition, the overriding principle for the CAA, in line with International principles and the approach of the Health and Safety Executive is that risks to aviation should be 'As Low as Reasonably Practicable' (ALARP)

The Applicant acknowledges that it has given little consideration to the hazards created by the presence of solar panels within areas currently available for engine or launch failure.

Burn Gliding Club with specialist and extensive aviation expertise has suggested a pragmatic approach to reduce the risks to aviation safety whilst not significantly impacting on the project.

We trust that this provides you with the information required but would be pleased to assist with any further queries.

Yours sincerely



Ann Bartaby BSc (Hons), DipTP, MRTPI, FRAeS, FRGS
Head of Planning

Cc: Neil Bale Secretary Burn Gliding Club