

Rosefield Solar Farm

Environmental Statement

Volume 4
Appendix 5.4: Glint and Glare Assessment
(Clean)

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Revision 2
Deadline 5
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Rosefield Energyfarm Limited

APFP Regulation 5(2)(a)
Planning Act 2008
Infrastructure Planning
(Applications: Prescribed Forms
and Procedure) Regulations 2009



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1. Introduction

1.1. Purpose of the report

- 1.1.1. This document has been updated at Deadline 5 in response to Action Point 21 of ISH3. This update relates to the supporting Pager Power glint and glare guidance, which has been included in Annex 3 of this report. The document references have not been updated from the original submission. Please refer to the **Guide to the Application [EN010158/APP/1.2.11]**.
- 1.1.2. This glint and glare assessment has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') to present the likely significant glint and glare effects in relation to the Development Consent Order (DCO) application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm (hereafter referred to as the 'Proposed Development').

1.2. The Order Limits

- 1.2.1. The extent of the Order Limits is shown in **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]** and the Proposed Development is described in full in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and shown spatially on the **Works Plans [EN010158/APP/2.3]**.

1.3. The Proposed Development

- 1.3.1. The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of solar photovoltaic ('PV') development and energy storage, together with associated infrastructure and an underground cable connection to the National Grid East Claydon Substation.
- 1.3.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts ('MW').
- 1.3.3. The location of the Proposed Development is shown on **ES Volume 3, Figure 1.1: Location Plan [EN010158/APP/6.3]**. The Proposed Development would be located within the Order Limits (the land shown on the **Works Plans [EN010158/APP/2.3]** within which the Proposed Development can be carried out). The Order Limits plan is provided as **ES Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. Land within the Order Limits is known as the 'Site'.

2. Legislative framework, planning policy and guidance

2.1. Background

- 2.1.1. There is no legislation of relevance to glint and glare assessments. This assessment has been undertaken with regard to the following planning policy and guidance.

2.2. National planning policy

- 2.2.1. National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) sets out the primary policy for decisions by the Secretary of State for nationally significant renewable energy infrastructure.
- 2.2.2. **Sections 2.10.102 to 2.10.106** set out general considerations for the assessment of impacts of glint and glare in relation to solar panels. Applicants are expected to identify receptors likely to have glint and glare issues, and to estimate the potential impact. The combined effect of frames and supports may also be considered. It is also mentioned that most commercially available Solar PV modules have anti-reflective finishes rendering them equal or less hazardous than objects typically found in the outdoor environment, such as bodies of water or glass buildings.
- 2.2.3. **Sections 2.10.134 to 2.10.136** give advice on possible mitigation measures to address the impacts of glint and glare, such as anti-reflective coating with a specified angle of maximum reflection attenuation, the implementation of screening to block reflections, or adjusting the azimuth alignment or the elevation tilt angle.
- 2.2.4. **Sections 2.10.158 and 2.10.159** state the need to consider the potential impact on receptors such as nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths), with **Section 2.10.159** stating that *“Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms”*.

2.3. Local planning policy

- 2.3.1. The Vale of Aylesbury Local Plan (VALP) 2013 – 2033 (Adopted September 2021), Policy C3 Renewable Energy, states that planning

permission will normally be granted for off-site renewable energy (including solar) where it has been demonstrated that certain criteria have been met, including that there is no significant adverse impact on local amenity, health or quality of life as a result of outlook through unacceptable visual intrusion and that there is no adverse impact on highway safety.

2.4. Guidance

- 2.4.1. UK Regulation (EU) 139/2014 (UK Civil Aviation Authority (CAA), 2018) sets out requirements and administrative procedures related to certified aerodromes to establish a consistent framework for aerodromes, ensuring safety and efficiency in aerodrome management and operation (including maintenance). Chapter M on visual aids for navigation (lights), **Section GM1 ADR-DSN.M.615**, requires a safety assessment to identify situations where the risk of dazzling becomes unacceptable. Dazzle due to veiling luminance should not exceed $20,000\text{cd/m}^2$, which could reduce the visual perception of pilots during approach and rolling, or of air traffic controllers supervising aircraft operations on, and close to the runway. Surprise (flash) effects should not be avoided on pilots at touchdown.
- 2.4.2. Guidance Note GA1 (Combined Aerodrome Safeguarding Team (CAST), 2024) recommends considering glint and glare over a wide area, covering visual reference points and other important points like the circuit. It also states that solar reflections with potential to cause after-image (“yellow glare”) are of considerable concern, especially for a pilot on approach. It recommends fixed solar panels, instead of tracking systems, due to the certainty over the range of times when glare is possible.
- 2.4.3. Aerodrome Safeguarding Advice Note 5 (CAST, 2024) provides high-level guidance regarding safety considerations (Air Traffic Service personnel and pilots) and study areas, but it does not prescribe a specific methodology for assessing glint and glare effects. It recommends early consultation with the aerodrome authority. A glint and glare assessment should be conducted for solar energy developments within 5km from an aerodrome, but it could be considered out 10km and beyond in exceptional circumstances. Safety should be considered for the Air Traffic Services personnel at the control tower, especially within the visual control room, pilots (on approach, in a visual circuit or on the ground, departing and taxiing aircraft), and Communication, Navigation, and Surveillance equipment. Panels close to the ends of a runway should accommodate an Energy Failure After Take-off area, which extends 45 degrees either side from the extended runway centreline.
- 2.4.4. Many aviation stakeholders refer to the US Federal Aviation Administration (FAA) Interim Policy ‘FAA Review of Solar Energy System Projects on Federally Obligated Airports 2013’ (FAA, 2013). This document

recommends undertaking technical assessments using the Solar Glare Hazard Analysis Tool (Sandia National Laboratories, 2016).

- 2.4.5. This assessment has also been carried out in accordance with industry best practice and two documents published by Pager Power. Firstly, the fourth edition of the Solar Photovoltaic and Building Development Glint and Glare Guidance (Pager Power, 2022), which includes guidance for aviation and railway operations, road users, and dwellings. Secondly, the second edition of the Solar Photovoltaic Glint and Glare Guidance (Pager Power, 2018), which includes methodology for the assessment of helipad operations.
- 2.4.6. At the time of undertaking this assessment, there was no published guidance on the effects of glint and glare on bridleways, public rights of way (PRoW) or fields with grazing animals.

3. Assessment methodology

3.1. Glint and glare definition

- 3.1.1. As per the definitions set out in **NPS EN-3, Paragraph 2.10.102**, glint is a momentary flash of bright light typically received by moving receptors or from moving reflectors.
- 3.1.2. Glare is a continuous source of bright light typically received by static receptors or from large reflective surfaces.
- 3.1.3. The term 'solar reflection' is used in this report to refer to both reflection types, glint and glare.

3.2. Methodology

- 3.2.1. The methodology for this glint and glare assessment is as follows:
 - Identification of key sensitive receptors in the area surrounding the Proposed Development;
 - Geometric analysis to determine if solar reflections will be visible from each receptor. Where the panels are not visible, no impact is possible upon the receptor;
 - Estimation of the annual Solar Glare Ocular Hazard Plot (SGOHP) using a Solar Glare Hazard Analysis Tool where solar reflections are visible;
 - Determination of the significance of the potential effects upon each receptor, following the specific criteria for each type of receptor with respect to published studies and guidance, and considering the SGOHP and any relevant mitigating factors; and
 - Establish whether these impacts will cause significant effects which may require additional mitigation.

3.3. Solar glare ocular hazard metric (SGOHP)

- 3.3.1. Glint and glare is evaluated using the SGOHP, which is the standard for measuring the ocular impact of any proposed solar energy system. It includes two metrics: The Potential for After-image and the potential for Permanent Eye Damage. The visual impact is a function of the retinal irradiance (brightness) and the subtended angle (size) of a glare source, and it quantifies the potential to cause an after-image in the retina, which would reduce the visual performance. SGOHP is classified as (**Figure 3.1**):
 - Green glare: Low potential to cause after-image;

- Yellow glare: Potential to cause an after-image; and
- Red glare: Potential for permanent eye damage.

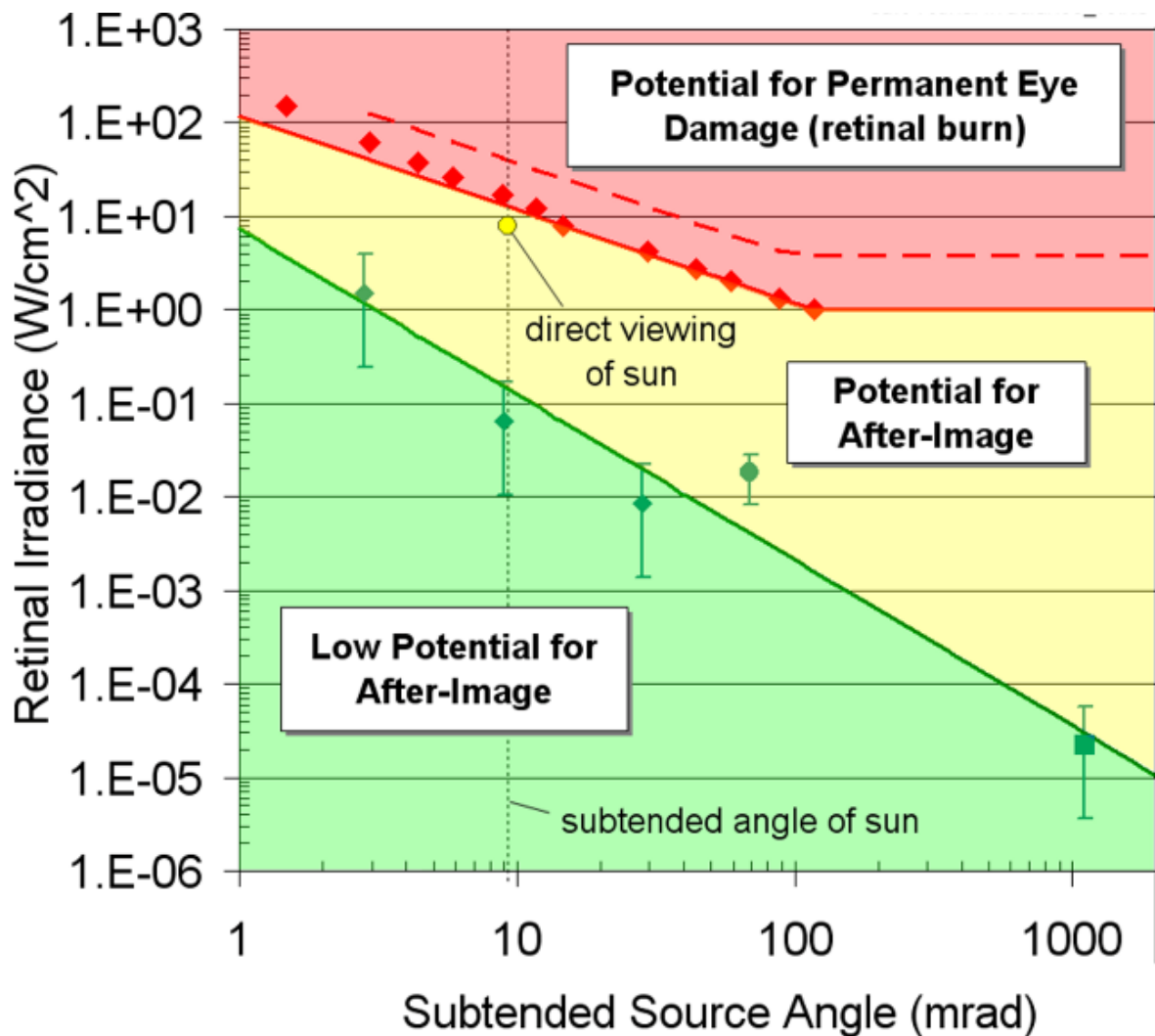


Figure 3.1: Solar glare ocular hazard plot

3.4. Technical assumptions and limitations

3.4.1. The technical assessments have been undertaken with the following assumptions:

- Clear and sunny skies for the entire year, as a highly conservative worst-case scenario;
- Fixed intensity within the cone of reflection, which is defined by the slope error of the Solar PV modules surface material;
- Solar panels being evenly distributed across the Solar PV areas;

- No consideration for Solar PV overshadowing between rows of panels, gaps between them or supporting structures;
- Times are denoted in standard time with no daylight savings;
- Only the front part of the Solar PV modules will reflect the solar rays. The reverse of the panels and other parts of the solar system (i.e. frames or supports) will have a matt finish and will therefore not cause solar reflections; and
- Terrain elevation heights have been interpolated based on Ordnance Survey (OS) Terrain 50m Digital Terrain Model (DTM) data.

3.4.2. The technical assessments in this report have been undertaken using the following assumptions for the retinal glare hazard metric:

- Ocular transmission coefficient 0.5;
- Pupil diameter 0.002m; and
- Eye focal length 0.017m.

4. Evaluation criteria

4.1. Impact levels for approaching aircrafts

- 4.1.1. The location of the solar reflection is more important than the duration of reflection on the receptors, as the receptor is fast-moving. The time of visible reflections may also be relevant in relation to operational schedules at the receptor. Solar reflections have no impact when receptors are not in use.
- Green glare or yellow glare with significant mitigating factors: Low impact;
 - Yellow glare without significant mitigating factors: Moderate impact; and
 - Red glare: High impact.
- 4.1.2. The FAA Interim Policy (FAA, 2013) allows only for green glare along the final approach.

4.2. Impact levels for Air Traffic Control Towers (ATCT)

- 4.2.1. The ATCT is the most sensitive aviation receptor, and the FAA Policy 2021 (FAA, 2021) recommends avoiding ocular impacts to the ATCT cab. However, a more pragmatic approach is included in more recent guidance (Pager Power, 2022):
- Green glare with significant mitigating factors: Low impact;
 - Green glare without significant mitigating factors or yellow glare: Moderate impact; and
 - Red glare: High impact.
- 4.2.2. The FAA Interim Policy (FAA, 2013) requires no glare to the ATCT.

4.3. Impact levels for road receptors

- 4.3.1. The angle of glare instances (i.e. the angle between the reflection and the receptors line of sight) has more of an impact on road users than the ocular hazard posed by the duration of glare, as it will become a distraction and obscure the sight of drivers, rather than a health or ocular hazard. As such, the following categorisations of impact apply regardless of the colour identified in the SGOHP assessment:
- Effective mitigating factors: Low impact.
 - Partial mitigating factors: Moderate impact.
 - No mitigating factors:

- Reflections not in front of view¹: Moderate impact;
- Reflections in front of view: High impact.

4.4. Impact levels for railway receptors

4.4.1. The angle of glare instances (i.e. the angle between the reflection and the receptors line of sight) has more of an impact on railway receptors than the ocular hazard posed by the duration of glare, as it will become a distraction and obscure the sight of drivers, rather than a health or ocular hazard. As such, the following categorisations of impact apply regardless of the colour identified in the SGOHP assessment:

- Effective mitigating factors: Low impact.
- Partial mitigating factors: Moderate impact.
- No mitigating factors:
 - Reflections not in front of view: Moderate impact;
 - Reflections in front of view: High impact.

4.5. Impact levels for building receptors

4.5.1. For buildings, the main factor is the frequency of glare, both daily and annually, more than the level of SGOHP. As such, the following categorisations of impact apply regardless of the colour identified in the SGOHP assessment:

- Reflections significantly screened or mitigated: Low impact.
- Reflections not screened/mitigated²:
 - Frequency < 90 hours/year and <60 min/day: Low impact;
 - Frequency < 90 hours/year or <60 min/day: Moderate impact; and
 - Frequency > 90 hours/year and >60 min/day: High impact.

4.6. Impact levels for other receptors

4.6.1. There is no specific guidance on glint and glare on PRow or bridleways. Glare should be avoided where possible, but it is generally considered that significant effects upon pedestrians on a PRow or riders on bridleways are not possible. The 'Advice on solar farms near routes used by equestrians' (The British Horse Society, 2025) states that 'any reflection is unlikely to be a direct problem to horses or equestrians because of the angles and distances involved and because the surface has a dull sheen

¹ The Applicant considers in front of view to be 10 degrees from the line of sight.

² 90 hours per year equate to three months (90 days) of 60 minutes per day.

rather than glare even on a bright day.' It also states that the BHS 'has no evidence of glint and glare from solar panels and no evidence of horses reacting to it or of it being detrimental to the health and wellbeing of horses.' The typical density of pedestrians and riders is low in a rural environment. There is little safety hazard associated with reflections towards an observer on a footpath or a bridleway, and any resultant effect is much less serious than, for example, on the road network. Furthermore, pedestrians or horses have more freedom to move beyond the solar reflection with little impact upon safety or amenity.

- 4.6.2. In the absence of specific glint and glare evaluation criteria for helicopters, impact levels are assimilated to those of approaching aircrafts.

4.7. Mitigating factors

- 4.7.1. Mitigating factors include, but are not limited to, the following:

- The reflections occur in the same direction to direct sunlight. In these cases, the user is likely to be prepared and adapted for glare;
- Significant screening (i.e. trees or hedgerows, deciduous or with gaps). This increases the likelihood of reflections will be less intense and smaller;
- Times of the day/year when reflections are visible. If the reflections do not overlap with the operational times of the receptor (i.e. use of a room or rush hour on a road), there is usually no impact;
- Type of road (major national, national, regional or local). The denser the traffic, the higher the risk of an accident;
- Length of the path (i.e. road/railway) affected by glare. The longer the path, the higher the risk of an accident;
- Duration of exposure. Continuous exposure may be more severe than one spread over time;
- Glare angle between the reflection and the line of sight. Glare is more intense close to the line of sight; and
- For buildings, oblique reflections impacting a window are less likely to be seen from inside.

4.8. Impact significance and mitigation

- 4.8.1. The significance and the need for mitigation depend on the level of impact:
- No impact: Reflection not visible. No mitigation required;
 - Low impact: Reflection visible but of limited relevance (i.e. significantly screened). No mitigation recommended;

- Moderate impact: Reflection visible but not under worst-case conditions. Mitigation recommended; and
- Major impact: Reflections visible under worst-case conditions, which implies a significant impact. Mitigation and consultation required.

4.8.2. The reflective capacity of Solar PV modules, especially those designed with anti-reflective glass or produced with anti-reflective coating, have a reflective capacity equal or less hazardous than elements already in the environment such as bodies of water, glazed element in buildings (i.e. windows or curtain walls), parking lots, metal structures, wet roads or even snow on the ground. This is recognised in **NPS EN-3** and FAA Policy 2021 (FAA, 2021).

5. Proposed Development location and details

5.1. Reflector areas

5.1.1. **Annex A, Figures A.1 to A.5** show the proposed Site layout, in line with **ES Volume 3, Figure 3.5: Zonal Masterplan [EN010158/APP/6.3]**, which includes three large reflector areas with Solar PV modules (shown in light blue):

- Parcel 1 to the west;
- Parcel 2 (north and south) at the centre;
- Parcel 3 to the east. A darker shade of blue along the eastern border of this parcel indicates an area under risk of flooding from Claydon Brook Tributary.

5.1.2. This layout assumes a worst-case scenario for the purposes of this assessment. Discreet elements (Compounds, Rosefield Substation, BESS, and BoSS) have not been included in this layout, as there is flexibility in their location within certain areas. Instead, those areas have been considered as fully dedicated to Solar PV modules. This is in line with **Table 5.3 in ES Volume 1, Chapter 5: Approach to the EIA [EN010158/APP/6.1]**.

5.1.3. All reflector areas feature the following characteristics:

- Fixed panels (no solar tracking system);
- Azimuth angle 180 degrees from north (due south);
- Elevation angle between 10 and 30 degrees;
- Minimum height AGL (above ground level) of 0.8m and maximum of 3.5m. For the purpose of this report, the middle height has been used (2.15m AGL). In areas under risk of flooding in Parcel 3, the Solar PV modules will be raised one additional metre. This is in line with **ES Volume 3, Figure 3.1A: Height Parameters [EN010158/APP/6.3]** and secured within the **Design Commitments [EN010158/APP/5.9]**; and
- Smooth glass with anti-reflective coating, with a slope error of 8.43mrad.

5.2. Embedded mitigation

5.2.1. The Proposed Development includes embedded mitigation (**Annex A, Figures A.2 and A.3**) consisting of screening in the form of vegetation to provide a barrier against glare, in order to ensure potential impacts are within recommendation range for receptors on the ground. Newly planted hedgerows will be approximately 0.6m to 0.8m high in Year 1. Once established around Year 10, these elements will have a height of 3.5m

AGL. Vegetation may provide varying levels of cover, immediately after planting, during winter, and after maintenance (i.e. pruning). For this assessment, only screening scheduled for early planting as set out in the **Outline Landscape and Ecological Management Plan [EN010158/APP/7.6]** has been considered. This will ensure significant coverage when the Solar PV modules are put in place.

6. Assessment receptors and obstructions

6.1. Study areas

- 6.1.1. There is little formal guidance with regard to the maximum distance at which glint and glare should be assessed. However, based on industry best practice and past assessment experience, two study areas have been defined and used in this assessment (**Annex A, Figure A.1**). These areas are defined by the maximum distance from the proposed Solar PV modules.
- 6.1.2. The first study area applies to aviation receptors and comprises up to 10km from the Solar PV modules.
- 6.1.3. The second study area applies to ground-based receptors (residential dwellings, roads, railways, PRoW and bridleways) and comprises up to 1km from the Solar PV modules. This study area is smaller than the above due to the reduced visibility (shielding by obstructions) and lower impact that occurs with distance (smaller size of reflections) for ground-based receptors.
- 6.1.4. This assessment has only considered receptors within the study areas and with potential view of the Solar PV modules.

6.2. Aviation receptors

- 6.2.1. The location of aviation receptors is presented in **Annex A, Figure A.1**. Seven aerodromes, airstrips and helistrips have been identified within the 10km study area (**Table 6.1**).

Table 6.1: Aviation infrastructures

Code	Name	Runway
RN1	Finmere Aerodrome GB-0077	10/28
RN2	Thornborough Grounds Airstrip GB-0208	04/22
RN3	Pear Tree Farm GB-0213	07/25
RN4	Bicester Aerodrome	16/34
RN5	Bicester Aerodrome	06/24
RN6	Bernwood Farm Airstrip GB-09015	09/27
RN7	Bernwood Farm Airstrip GB-09015	05/23
RN8	Field Farm Airstrip GB-0941	15

Code	Name	Runway
HP1	Field Farm Helistrip GB-0793	-

- 6.2.2. 12 active approaching flying paths (**Table 6.2** and **Annex A, Figure A.1**) with significant views of the proposed solar reflector areas have been selected in relation to the aviation infrastructures in **Table 6.1**.
- 6.2.3. Bernwood Farm (**RN6** and **RN7**) has been excluded from the assessment as the tenancy is being surrendered and the airstrip will not be in use during the construction, operation (including maintenance) and decommissioning of the Proposed Development. Impacts on the approaches to Field Farm Airstrip (**RN8**) are not geometrically possible as it is located to the south and the low tilt angles for the Solar PV modules.

Table 6.2: Flying paths

Code	Name
FP01	Finmere Aerodrome runway 10
FP02	Thornborough Grounds Airstrip runway 04
FP03	Pear Tree Farm runway 07
FP04	Bicester Aerodrome runway 16
FP05	Bicester Aerodrome runway 06
FP06-FP12	Field Farm Helistrip GB-0793

- 6.2.4. Flying paths generally represent planes approaching a runway for landing. The standard flying path, as defined in the FAA Interim Policy (FAA, 2013), is a two-mile approach in line with the runway with a three degrees gliding slope and a 15.4m threshold height on landing. Departing aircrafts are not included because after taking off, pilots will be looking up towards the sky and not down at elements on the ground.
- 6.2.5. In case of helipads, all possible approaching paths are assessed unless specified or requested otherwise. This includes two-mile approaches from all directions, with a 10 degrees descent path and a 2m threshold height on landing (approximate eye level of a helicopter pilot) over the helipad centre point.
- 6.2.6. Pilots are assumed to have a field of view of 30 degrees vertically and 50 degrees horizontally from the direction of travel.

- 6.2.7. An ATCT at Bicester Aerodrome has also been considered in the assessment. The observation height has been estimated at 8m AGL.

6.3. Road and railway receptors

- 6.3.1. Only local roads were found within the 1km study area. The most relevant of these roads can be found in **Table 6.3** and **Annex A, Figures A.4 and A.5**. Smaller roads leading to individual dwellings are not considered. Based on the significant criteria in Solar Photovoltaic and Building Development Glint and Glare Guidance from 2022, local roads need not be included in the detailed assessment because only low impacts would be found in a worst-case scenario, which would have no significant effects. This is because traffic volumes and speeds are likely to be relatively low, resulting on low risk on local traffic. Therefore, an overview assessment has been undertaken on these roads.

Table 6.3: Road receptors

Code	Name	Type
RD1	School Hill	Local
RD2	Addison Road	Local
RD3	Orchard Way	Local
RD4	Claydon Road	Local
RD5	Botyl Rd./St. Marys Rd.	Local
RD6	East Claydon Road	Local
RD7	Hogshaw Road	Local

- 6.3.2. Three railway sections are present within the 1km study area (**Table 6.4** and **Annex A, Figure A.4**). Both directions of travel have been considered on these sections, with a driver eye height of 2.75m above the railway tracks.

Table 6.4: Railway receptors

Code	Name
RW1	High Speed 2 (HS2)
RW2	East West Rail
RW3	Provision for future local services

6.4. Building receptors

- 6.4.1. In built-up areas with multiple layers of buildings, only the outer buildings have been considered. Where groups of buildings share the same potential impact in terms of glint and glare, only one building has been selected as representative of the rest. Therefore, 39 buildings (mostly dwellings) have been selected within the 1km study area (**Table 6.5** and **Annex A, Figures A.4 and A.5**).
- 6.4.2. The analysis has focused on ground floor spaces, as it is typically considered the main living space and has a greater significance with respect to residential amenity and views from the first floor. The observation point is set at 1.8m AGL.

Table 6.5: Building receptors

Code	Name	Location
BL01	Old Dairy	Steeple Claydon
BL02	Pond Farm	Steeple Claydon
BL03	Calvert Cottages	Calvert
BL04	Calvert Cottages	Calvert
BL05	Rosehill Farm	Steeple Claydon
BL06	Shepherd's Furze Farm	Steeple Claydon
BL07	Knowlhill Farm	Middle Claydon
BL08	Finemerehill House	Quainton
BL09	Dry Leys Farm	Quainton
BL10	The Ox House	Quainton
BL11	Hill Cottage Farm	Quainton
BL12	Hogshaw Farm	Quainton
BL13	Oak Cottages	Hogshaw
BL14	Borshaw Farm	Hogshaw
BL15	Unknown	Hogshaw
BL16	Staplers Piece	Granborough

Code	Name	Location
BL17	Berry Lees Farm	East Claydon
BL18	Tuckey Farm	Winslow
BL19	Station House	East Claydon
BL20	Sion Hill Farm	East Claydon
BL21	House in Churchway	East Claydon
BL22	Whitehouse Farm	East Claydon
BL23	Bernwood Farm	Botolph Claydon
BL24	Touchwood	Botolph Claydon
BL25	2 Botyl Road	Botolph Claydon
BL26	12 Botyl Road	Botolph Claydon
BL27	Botyl Road	Botolph Claydon
BL28	1-23 Orchard Way (odd)	Botolph Claydon
BL29	Muxwell Farm	Botolph Claydon
BL30	Claydon House	Middle Claydon
BL31	Catherine Farm	Middle Claydon
BL32	Blackmore Hill Farm Cottages	Middle Claydon
BL33	4-7 Catherine Cottages	Middle Claydon
BL34	Winters Tale Farmhouse	Middle Claydon
BL35	13-17 Brackley Lane	Calvert
BL36	South Lodge	Middle Claydon
BL37	The Leys Cottage	Granborough
BL38	Rookery Farm	Granborough
BL39	Ricall Farm	Granborough

6.5. Other receptors

- 6.5.1. Several PRow and bridleways are present within the 1km study area (**Annex A, Figures A.4 and A.5**). These include two Long Distance Route receptors: Bernwood Jubilee Way (**PW1**) and North Buckinghamshire Way/Midshires Way (**PW2**). At the time of undertaking this assessment, there was no published guidance in relation to this type of receptors. Therefore, PRow and bridleways have been considered in an overview assessment.
- 6.5.2. Padding fields at Hogshaw Farm have been included in the assessment (**FL1** in **Annex A, Figure A.5**) in addition to buildings in Hogshaw Farm's complex (**BL12** in **Table 6.5**) as a response to concerns expressed by the owners of the farm in the Phase Two Consultation. An overview assessment has been undertaken due to absence of glint and glare guidance on grazing animals on fields.

6.6. Obstruction elements

- 6.6.1. Large elements in the landscape can act as barriers and block solar reflections from view. As a worst-case, only permanent elements of significant size have been included in the analyses. These comprise woods and structures (**Annex A, Figures A.2 and A.3**).
- 6.6.2. Ten large existing woods within the 1km study area have been identified and included in the assessments (**Table 6.6** and **Annex A, Figures A.2 and A.3**). These are mostly Local Wildlife Sites (LWS) and Sites of Special Scientific Interest (SSSI). Other smaller woods of significant mass and density have also been included.

Table 6.6: Existing woods

Code	Name	Height AGL (m)
W01	Unknown	8
W02	Shrubs Woods (LWS)	8
W03	Decoypond Wood (LWS)	8
W04	Sheephouse Wood (SSSI)	8
W05	Home Wood (LWS)	8
W06	Romer Wood (LWS)	8
W07	Greatsea Wood (LWS)	8
W08	Balmore Wood (LWS)	8

Code	Name	Height AGL (m)
W09	Runt's Wood (LWS)	8
W10	Finemere Wood (SSSI)	8
Other	Unnamed	8

- 6.6.3. Structures and small elements in the landscape have generally not been considered in the analyses. However, a number of larger structures such as farm barns have been included where these could have a significant shielding effect on the solar reflections for particular receptors (**Annex A, Figures A.2 and A.3**).

7. Nearby solar projects

- 7.1.1. Four solar farms have been identified in close proximity to the Proposed Development, which could potentially result in cumulative effects on the receptors identified when considered together with the Proposed Development. These are listed in **Table 7.1** and their locations presented in **Annex A, Figures A.1 to A.5**.

Table 7.1: Nearby solar projects

Code	Name	Anticipated generating capacity (MW)	Notes
SF01	Longbreach Solar Farm (Planning ref. 25/01865/APP)	49.9	Pending decision
SF02	Fox Covert Solar Farm	22	Constructed
SF03	Tuckey Solar Farm	25	Approved
SF04	Calvert Solar Farm	13	Pending decision

8. Overview assessments

8.1. Roads

- 8.1.1. Drivers travelling east along School Hill (**RD1**) may see solar reflections from solar reflectors in Parcel 1 early in the mornings around the summer months³, especially from the bridge over the railway line (**RW1**). Further east, solar reflections will be significantly screened by the existing hedges and trees on the southern edge of the road. Drivers travelling west will not receive solar reflections from the back of the Solar PV modules. **Low impact is predicted.**
- 8.1.2. Drivers travelling south along Addison Road (**RD2**) will not receive solar reflections from the back of Solar PV modules. Solar reflections on drivers travelling north are not possible. **No impact is predicted.**
- 8.1.3. Drivers travelling along Orchard Road (**RD3**) may receive limited solar reflections from Solar PV modules on the northern edges of Parcel 1 around the summer months. These reflections would be seen early in the morning for drivers travelling east and late in the evening for drivers travelling west. Solar reflections will be significantly screened by existing hedges and trees along the southern edge of the road. As the reflections occur in the same direction as direct sunlight, the driver eyesight is already adapted to bright sunlight, reducing the potential impact. **Low impact is predicted.**
- 8.1.4. Drivers travelling north along Claydon Road (**RD4**) will not see solar reflections within their field of view due to the low tilt angle of the Solar PV modules, which will only reflect the northern sky. Drivers travelling south will not receive solar reflections from the back of Solar PV modules. **No impact is predicted.**
- 8.1.5. Drivers on Botyl Road and St. Marys Road (**RD5**) will not receive solar reflections within the field of view due to the distance to the solar reflectors, the direction of travel and the significant screening from houses, trees and hedges. **No impact is predicted.**
- 8.1.6. Drivers on East Claydon Road (**RD6**) will not receive solar reflections from the back of the Solar PV modules in Parcel 3. **No impact is predicted.**
- 8.1.7. Drivers travelling west along the western section of Hogshaw Road (**RD7**) may see solar reflections from Parcel 2 north. These reflections would be visible late in the evenings around the summer months, they would be simultaneous with direct sunlight, and they would be significantly screened

³ From March to September.

by existing trees and hedges along the road. Drivers on the eastern section of the road and drivers travelling east will not receive solar reflections. **Low impact is predicted.**

- 8.1.8. Overall, the roads analysed will receive **low or no impacts** in terms of glint and glare (**Table 8.1**). The traffic volumes and/or speeds on local roads are likely to be relatively low, and any solar reflections from the Proposed Development that are experienced by a road user would be considered of **low impact** in the worst-case scenario. This will result in **no significant adverse** effects, and therefore no additional mitigation is required.

Table 8.1: Summary of road analysis

Code	Name	Predicted Impact
RD1	School Hill	Low
RD2	Addison Road	None
RD3	Orchard Way	Low
RD4	Claydon Road	None
RD5	St. Marys Road	None
RD6	East Claydon Road	None
RD7	Hogshaw Road	Low

8.2. PRow and bridleways

- 8.2.1. Several PRow and bridleways run through and around the Site.
- 8.2.2. Professional experience suggests that significant effects to pedestrians or observers along PRow due to glint and glare from solar developments are not possible. The sensitivity of the receptors (in terms of amenity and safety) is low because:
- Effects would typically coincide with direct sunlight. The sun is a far more significant source of glare as it is more intense than reflected sunlight. Observers also have a higher tolerance to glare when their eyes are adapted to direct sunlight;
 - The reflection intensity from Solar PV modules is similar to still water, and significantly less than reflections from glass or steel, which is frequently a feature of the outdoor environment surrounding PRow. Therefore, the reflections are likely to be comparable to those from

common outdoor sources whilst navigating the natural and built environment on a regular basis;

- The typical density of pedestrians, cyclists and/or horse riders on a PRow is low in a rural environment, such as the location of the Proposed Development;
- Any resultant effect is much less serious and has far lesser consequences than, for example, solar reflections experienced by drivers on roads or the railway where the resultant impacts of a solar reflection can be much more serious to safety;
- Glint and glare effects towards observers on a PRow are transient in time and location, and observers can move beyond the solar reflection zone with ease with little impact upon safety or amenity; and
- Most solar reflections are likely to be screened by existing and proposed vegetation, and the effectiveness will increase in time as vegetation grows.

8.2.3. Overall, the PRow and bridleways analysed will receive **low or no impact** in terms of glint and glare. This will result in **no significant adverse** effects, and therefore no additional mitigation is required.

8.3. Other receptors

8.3.1. A geometric assessment of solar reflections from Parcel 2 north shows that these could be visible from the western padding fields at Hogshaw Farm (receptor **FL1**). These reflections will be visible for less than half an hour, immediately before sunset during the summer months, and they will be simultaneous with direct sunlight from the setting sun. Proposed embedded mitigation in the form of early planting up to 3.5m high on the eastern boundary of Parcel 2 north will provide significant screening to those fields to block solar reflections. Although the effectiveness of this screening may be temporarily reduced in the early years, **low impact** is predicted.

8.3.2. Although there is no specific guidance regarding glint and glare to grazing animals on fields, the predicted frequency of glare would be within recommendation for other sensitive ground-based receptors such as dwellings. Therefore, it can be considered that potential solar reflections upon these fields will result in **no significant adverse** effects, and no additional mitigation is required.

9. Technical assessments

9.1. Background

- 9.1.1. Two scenarios were considered using the minimum and maximum tilt values for the Solar PV modules: 10 and 30 degrees. The elevation angle for the Solar PV modules will be constrained between these two tilt values, as specified in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]** and secured via the **Design Commitments [EN010158/APP/5.9]**.
- 9.1.2. The results of the technical assessment are presented in **Annex B**. The output of this analysis is limited to receptors receiving solar reflections within the field of view. The receptors omitted in the output will receive no glare impacts.
- 9.1.3. The graphs show the visible reflections throughout the year and their level of glare as perceived from the receptor. For route receptors (i.e., flying paths, railways or roads), every instance in time represents the highest level of glare along the entire length of the receptor analysed. These graphs also show when these reflections are visible (days/months and times). Times are standard clock time with no summer savings.
- 9.1.4. It should be noted that the assessment assumes worst-case conditions (full sunny weather throughout the year and no cloud coverage). The risk of glare, in reality, will be significantly lower than predicted. For ground-based receptors, reflections will occur very close to direct sunlight from a viewer's point of view due to the timings (dawn and sunset) and the low tilt (between 10-30 degrees). This means that the reflection will not catch the viewer unprepared and any potential impacts will be less intense.

9.2. Results for aviation receptors

- 9.2.1. The results show green glare early in the morning (between 5AM and 7AM) in both scenarios on the following receptors (**Annex B, Table B.1**):
- Pear Tree Farm runway 07 (**FP03**);
 - Bicester Aerodrome runway 06 (**FP05**); and
 - Field Farm Helistrip (**FP06 to FP12**).
- 9.2.2. These levels of glare will result in **low impact** with **no significant adverse** effects, which would therefore require no additional mitigation.
- 9.2.3. No solar reflections will be visible from the ATCT at Bicester Aerodrome (**AT1**).

9.3. Results for railway receptors

- 9.3.1. The results show marginal green glare on **RW01** for trains travelling south early in the morning (between 6AM and 7AM) in the 10 degrees tilt scenario (**Annex B, Table B.2**), and no solar reflections in with 30 degrees tilt. As these reflections will have large glare angles from the line of sight, the impact will be **low**. This impact will have **no significant adverse** effects and therefore requires no additional mitigation.

9.4. Results for building receptors

With regards to buildings, the frequency of solar reflections is the key parameter. The analysis shows that none of the 39 buildings assessed will exceed the recommended limits of 60 minutes per day and 90 hours per year (**Annex B, Table B.3**). This will result in **low impact** with **no significant adverse** effects, which will therefore require no additional mitigation.

10. Cumulative assessment of nearby solar projects

10.1. Background

- 10.1.1. The identified four nearby solar projects do not qualify as Nationally Significant Infrastructure Projects (NSIPs) due to their anticipated generation capacity (less than 50MW). Their size implies that potential cumulative adverse effects on receptors in the study area are less likely.
- 10.1.2. It should be noted that these projects are likely to include embedded mitigation measures to avoid significant adverse effects on receptors on their own.
- 10.1.3. None of the typical glare sources in rural environments are causing adverse instances of glint or glare around the Site at present, although it is considered feasible that new (natural) glint and glare sources could be introduced to the study area in the future. These sources include:
- Rainwater collected on roofs, fields, and roads;
 - Bodies of water e.g., ponds/lakes/rivers; and
 - Building/greenhouse windows.

10.2. Ground-based receptors

- 10.2.1. Cumulative effects are only possible where study areas overlap. In the case of ground-based receptors, this implies another project within 2km that has a 1km study area.
- 10.2.2. Longbreach Solar Farm (**SF01**) can potentially cause significant effects on **BL15**, **BL16** and **RD7**. Glare from the Proposed Development on **BL15** and **BL16** is very low, and it is predicted to be marginal on the eastern part of **RD7**. Therefore, cumulative effects are likely to be **not significant**.
- 10.2.3. Fox Covert Solar Farm (**SF02**) does not share ground-based receptors with the Proposed Development.
- 10.2.4. Tuckey Solar Farm (**SF03**) could have significant effects on **BL17**, **BL18**, and **RD6**. As the Proposed Development will have no impacts on these receptors, no cumulative effects are possible. **SF03** will have no impacts on **BL19**, as it is shielded by existing woods, and on **BL20**, as it is far south. Therefore, no significant cumulative effects will affect these two properties.
- 10.2.5. Calvert Solar Farm (**SF02**) only shares the HS2 railway (**RW1**) with the Proposed Development. **SF02** is unlikely to impact **RW1**, as it is located on a slope oriented southwest, away from the railway line. As impacts

from the Proposed Development are also marginal, no significant cumulative effects are predicted.

- 10.2.6. Overall, cumulative effects on ground-based receptors will be **not significant**.

10.3. Aviation receptors

- 10.3.1. Cumulative effects on the identified aviation receptors are theoretically possible as the four nearby solar projects are within the 10km study area.
- 10.3.2. Very limited cumulative effects are predicted on Finmere Aerodrome (**FP01**) from **SP01**, **SP02** and **SP03**, and on receptors **FP03** to **FP12** from **SP04**.
- 10.3.3. The glint and glare impacts on aviation receptors from the Proposed Development are low. The limited size of nearby solar projects and large distances to these receptors are also predicted to result in low impacts. The combined effects are predicted to be **not significant**.

11. Conclusions

- 11.1.1. This assessment has considered sensitive receptors around the Site consisting of flying paths, roads, railway, buildings, PRow, bridleways and fields.
- 11.1.2. Embedded mitigation, consisting of vegetation screening 3.5m AGL, has been included within the assessment. The assessment results conclude that the Proposed Development will only have **low** impact on certain identified sensitive receptors, and all effects are predicted to be **not significant**.
- 11.1.3. Cumulative effects from nearby solar projects are also predicted to be **not significant**.

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Annex A: Analysis Elements



Annex A: Analysis elements

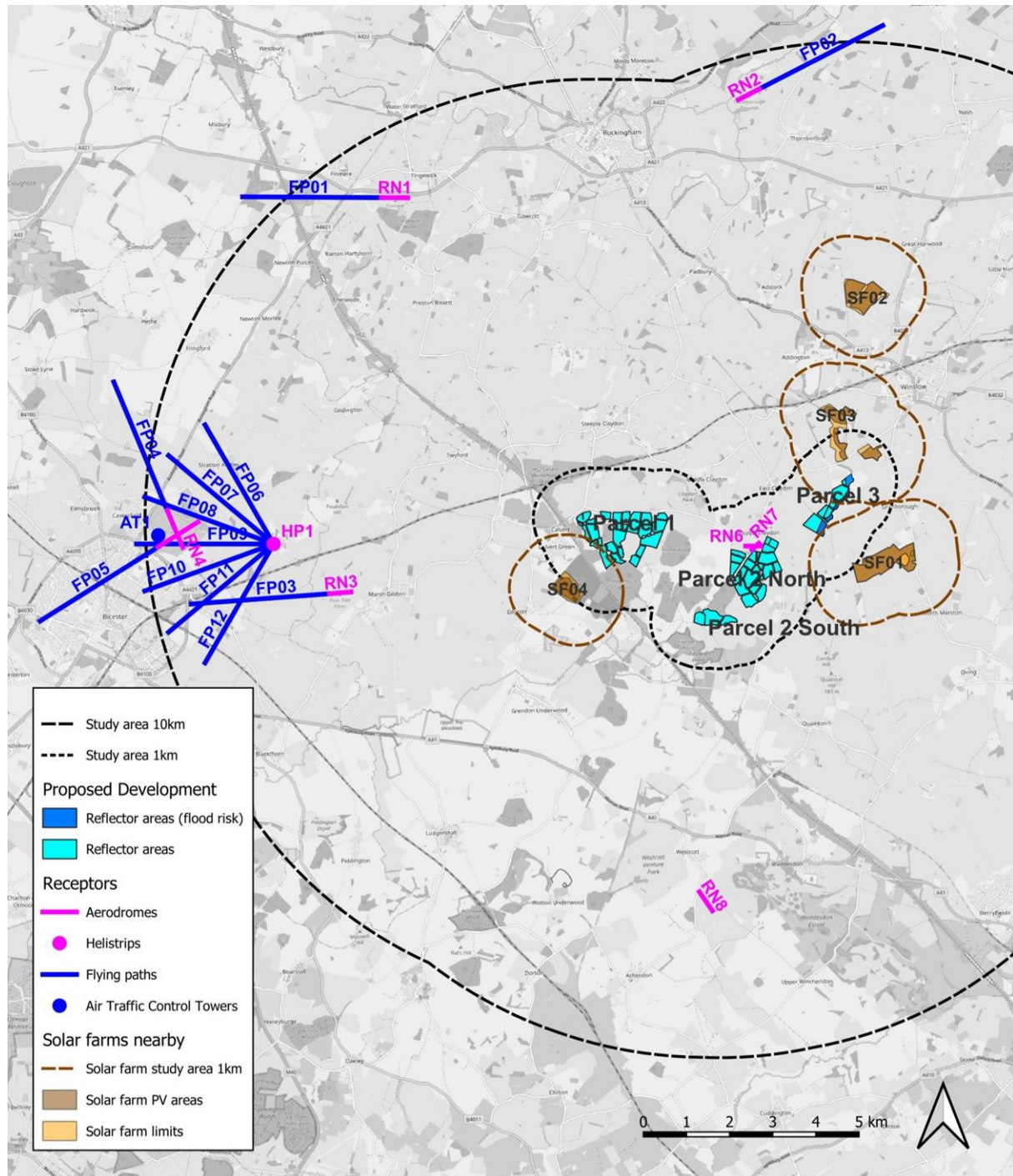


Figure A.1: Analysis elements within the 10km study area

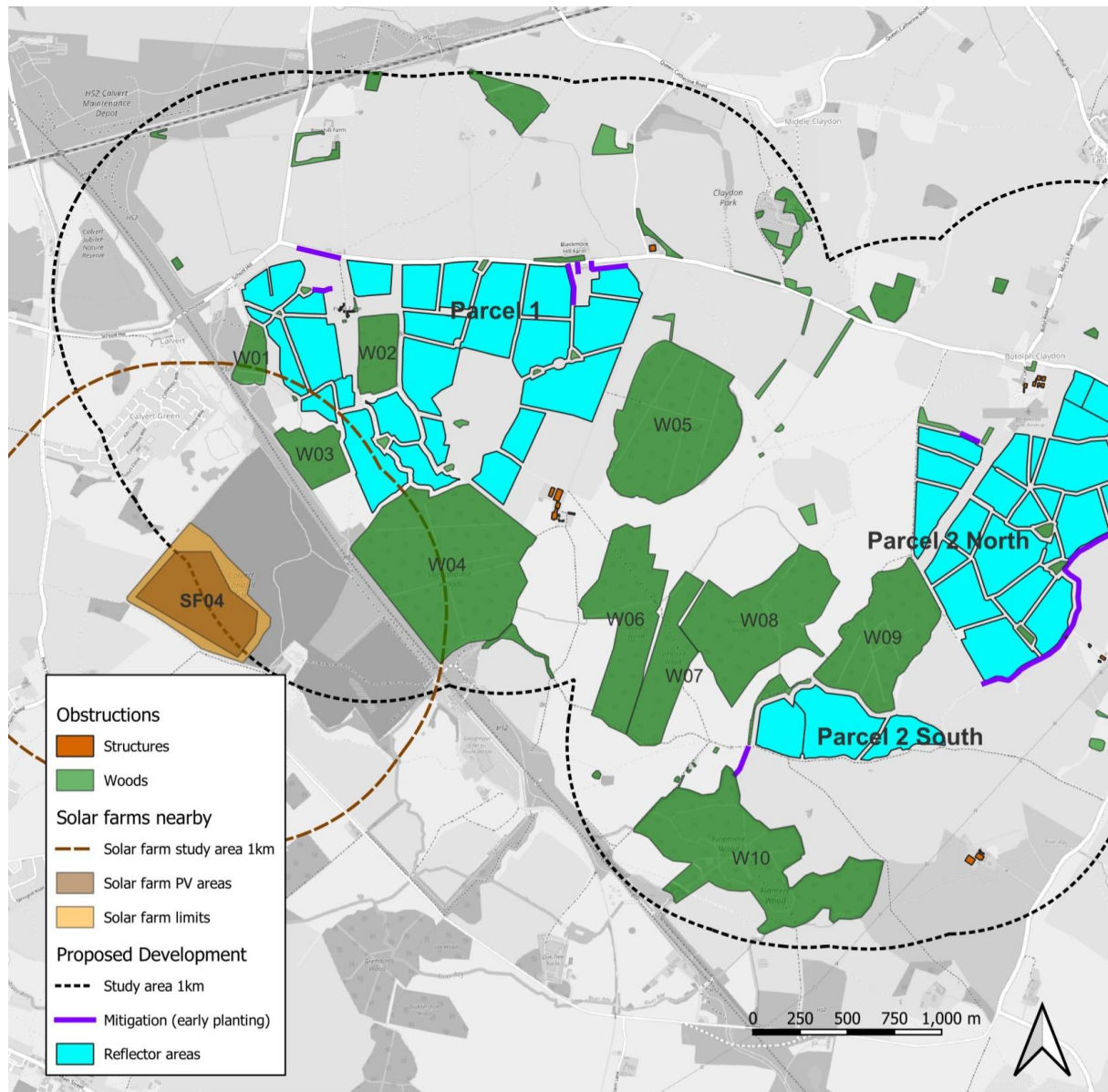


Figure A.2: Proposed Development, obstructions and solar farms nearby within the 1km study area (**WEST** section).

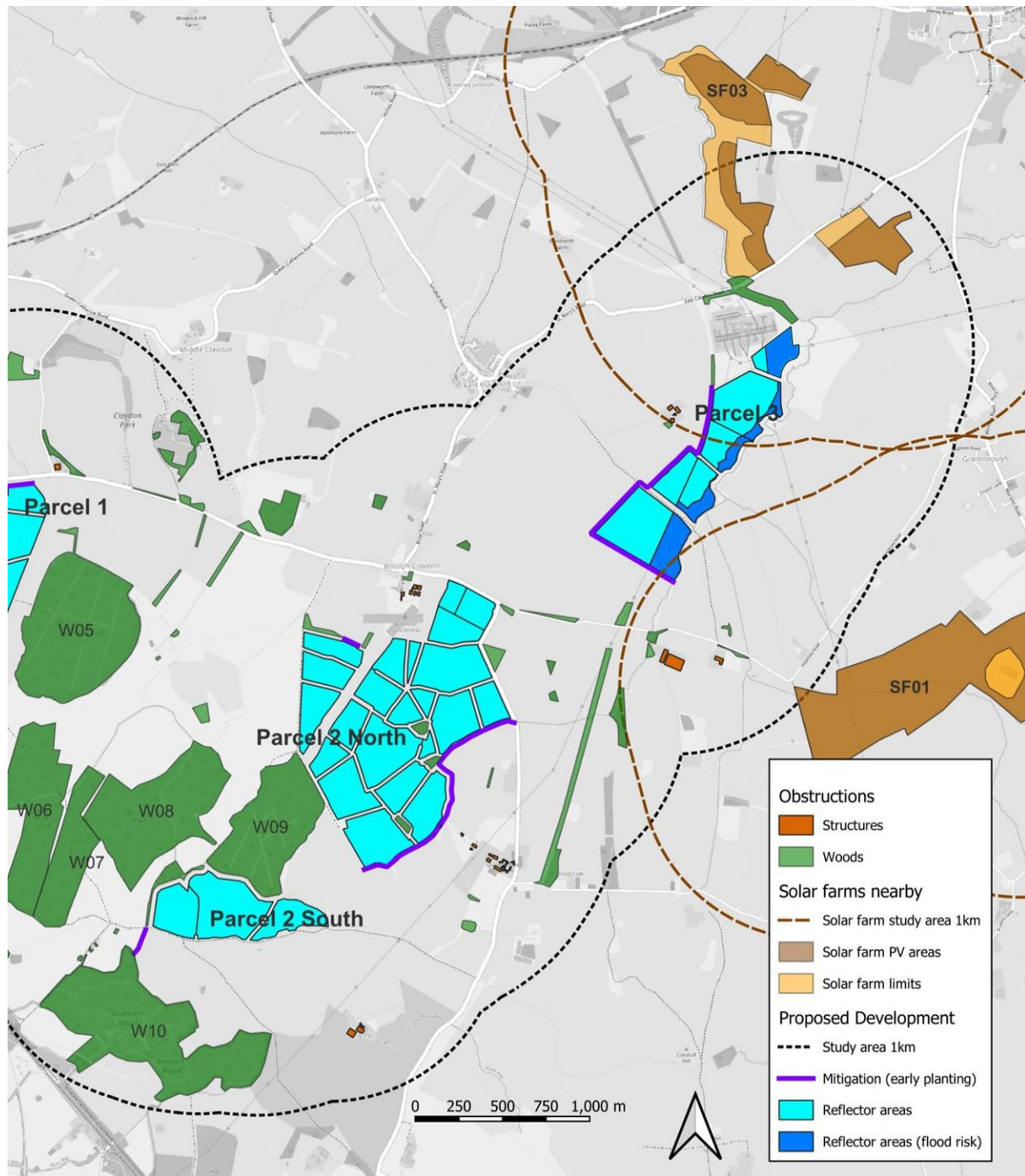


Figure A.3: Proposed Development, obstructions and solar farms nearby within the 1km study area (**EAST** section).

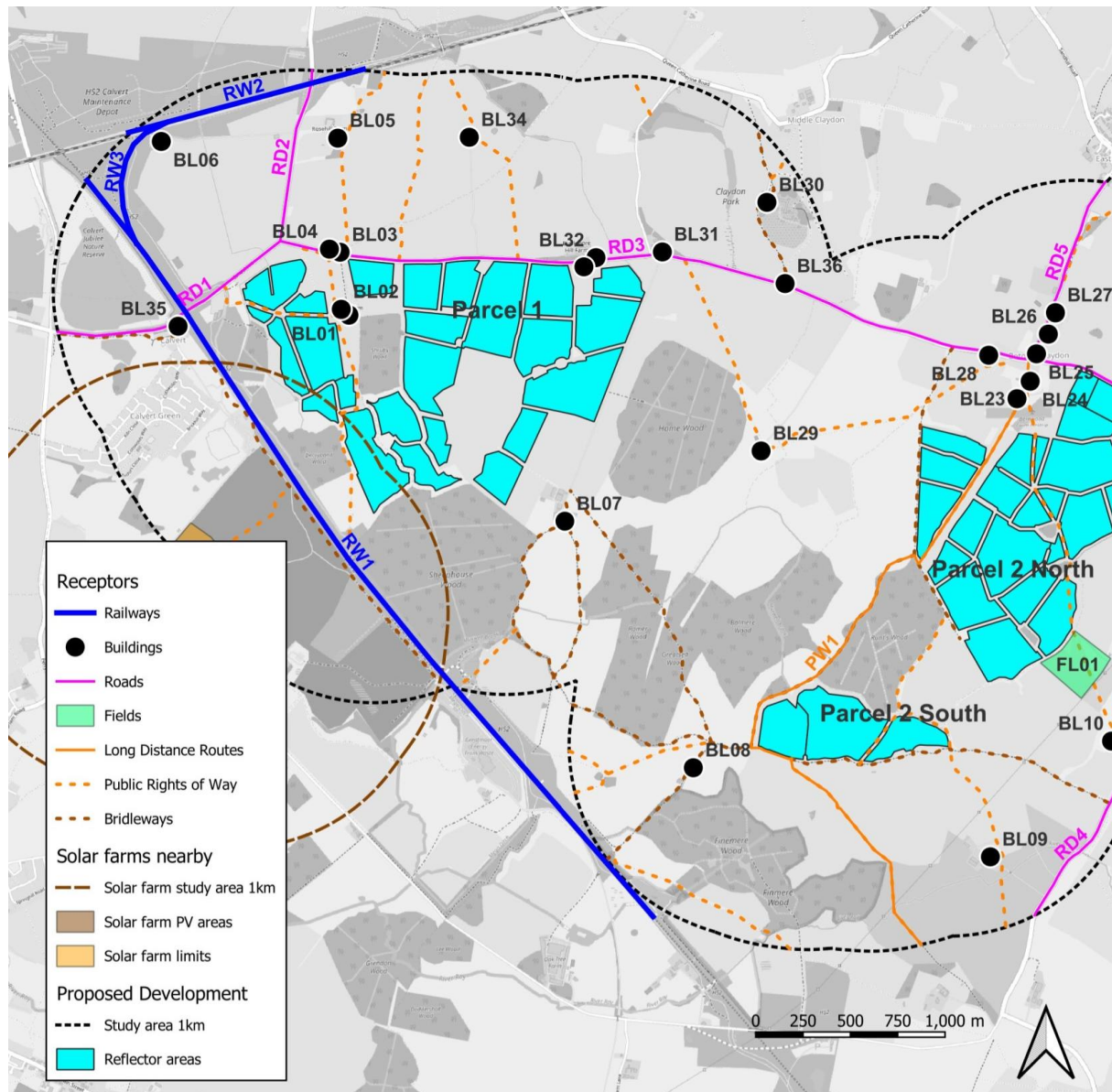


Figure A.4: Receptors within the 1km study area (**WEST** section)

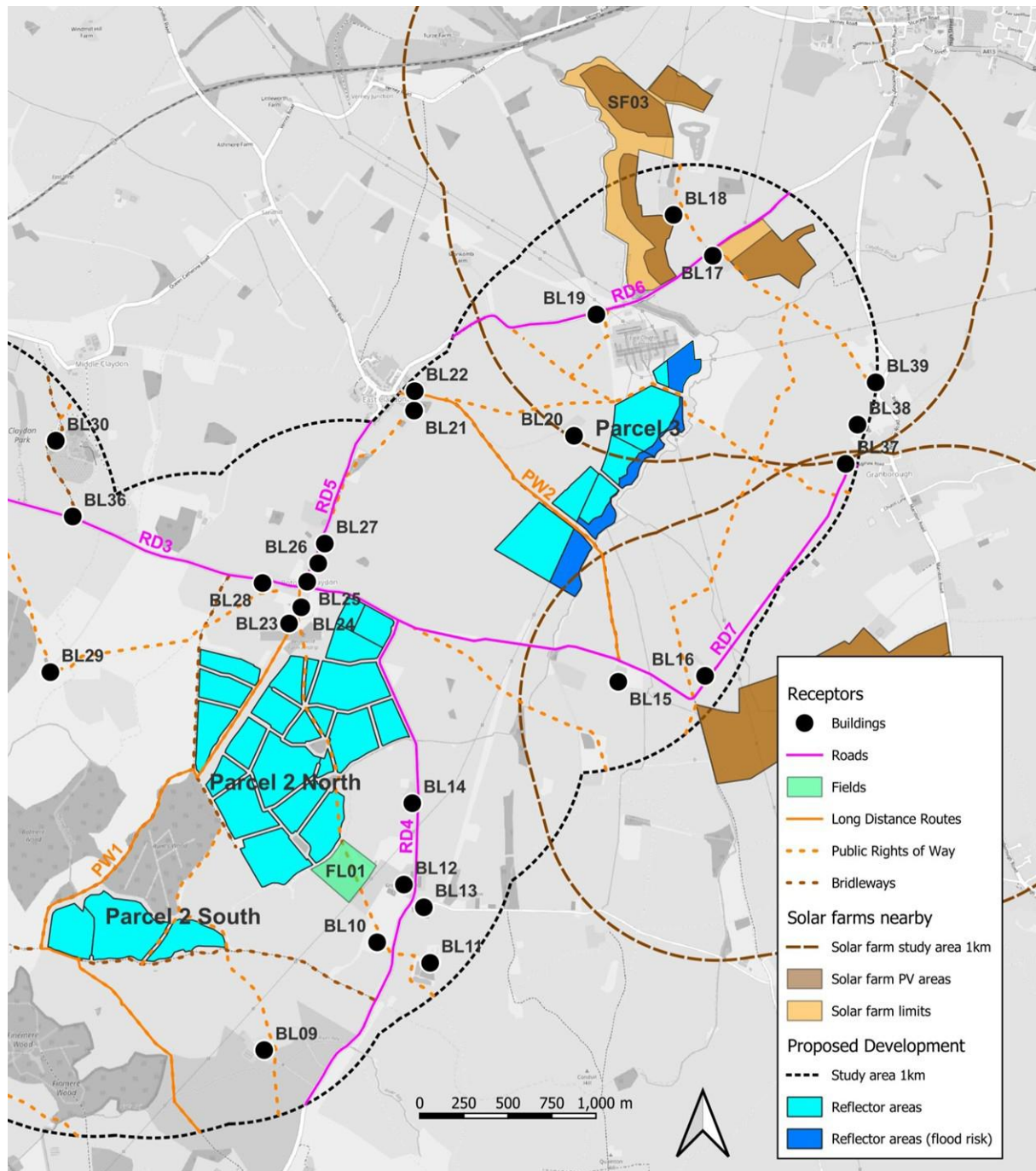


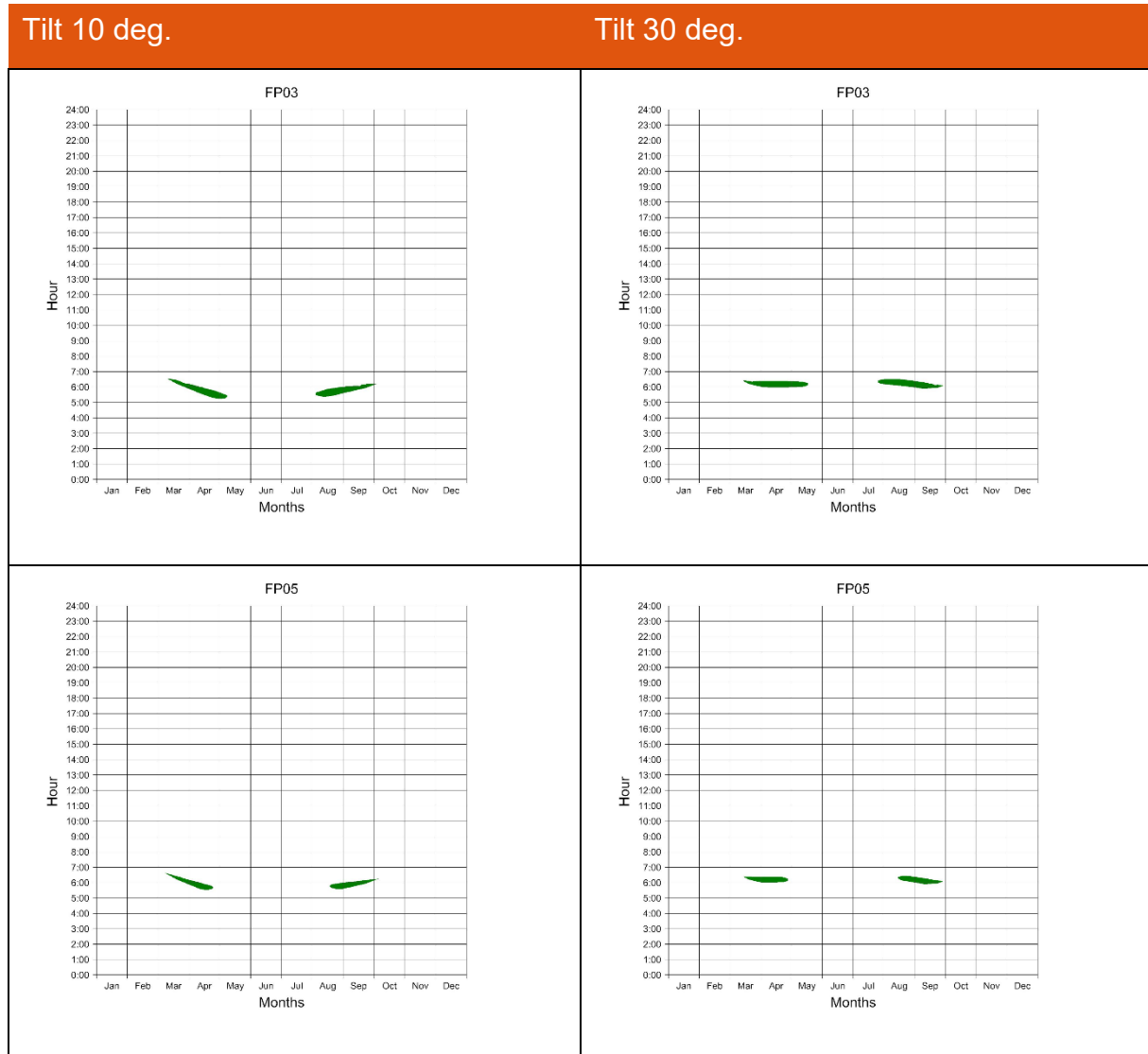
Figure A.5: Receptors within the 1km study area (**EAST** section)

Annex B: Assessment Results



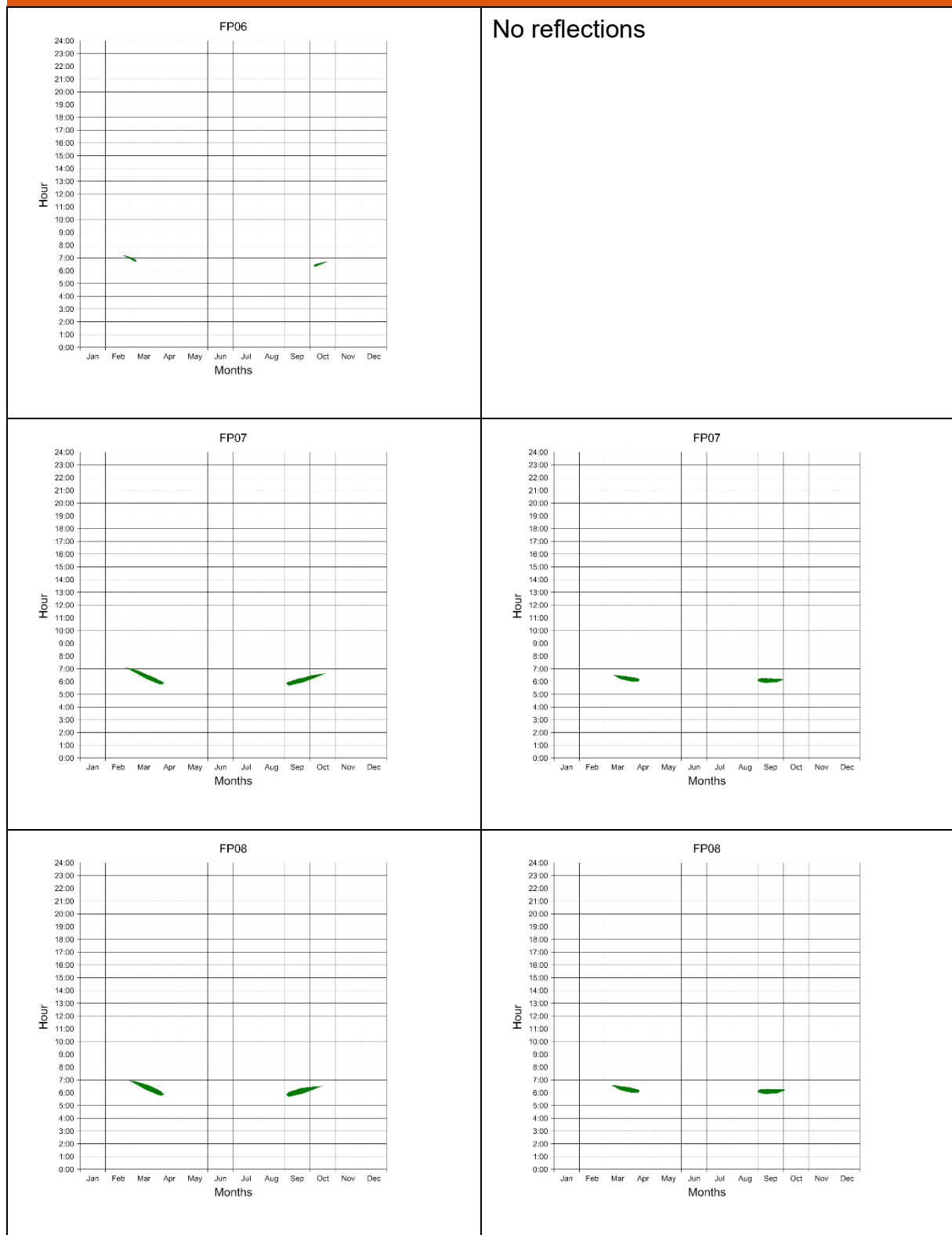
Annex B: Assessment results

Table B.1: Annual retinal glare hazard for aviation receptors



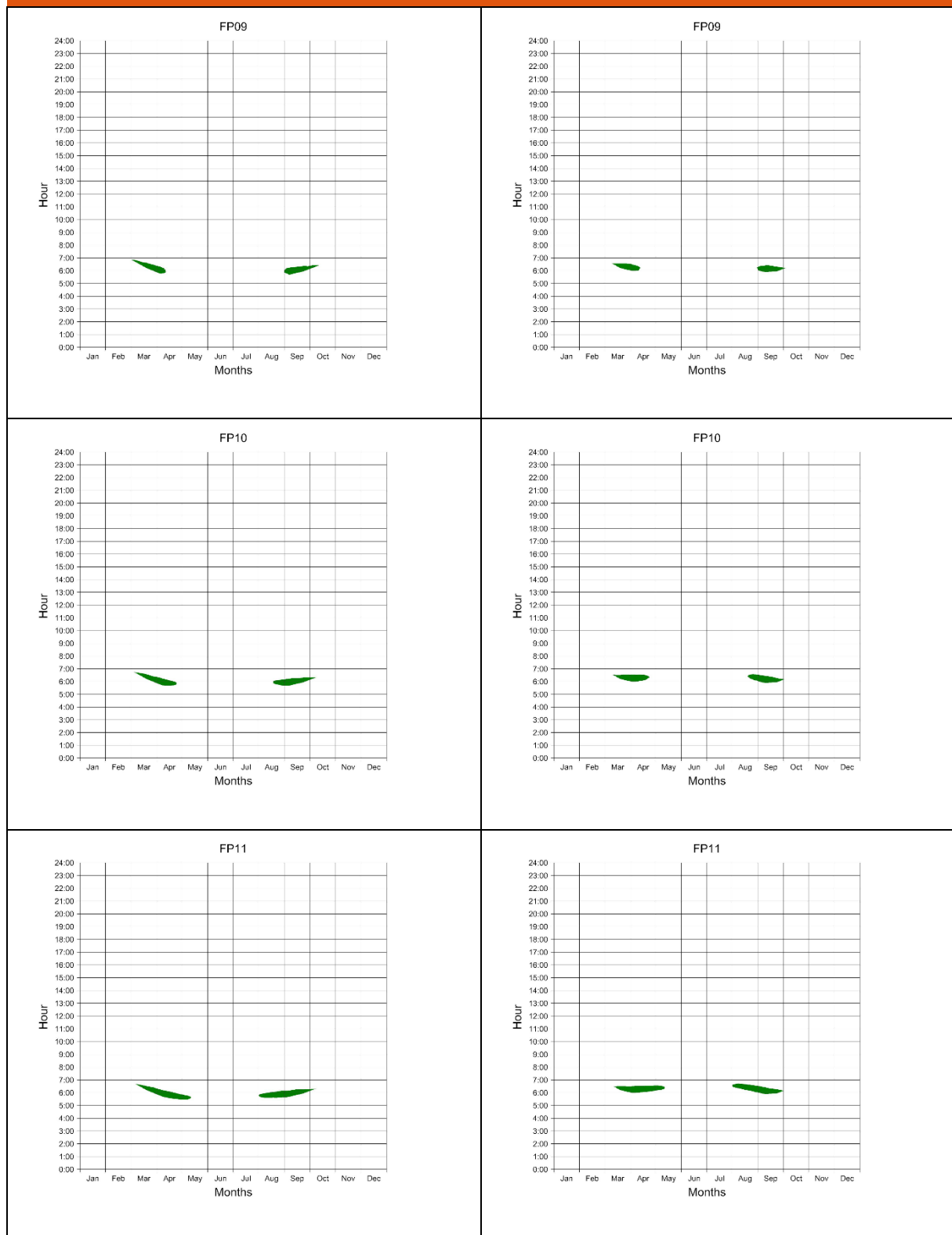
Tilt 10 deg.

Tilt 30 deg.



Tilt 10 deg.

Tilt 30 deg.



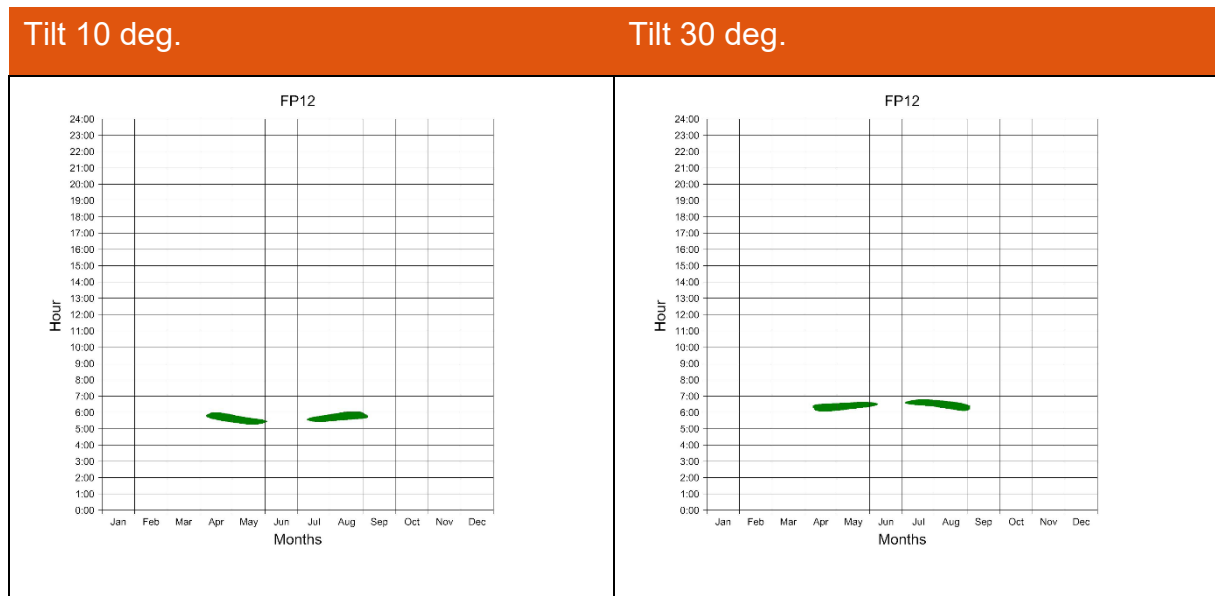


Table B.2: Annual retinal glare hazard for railway receptors

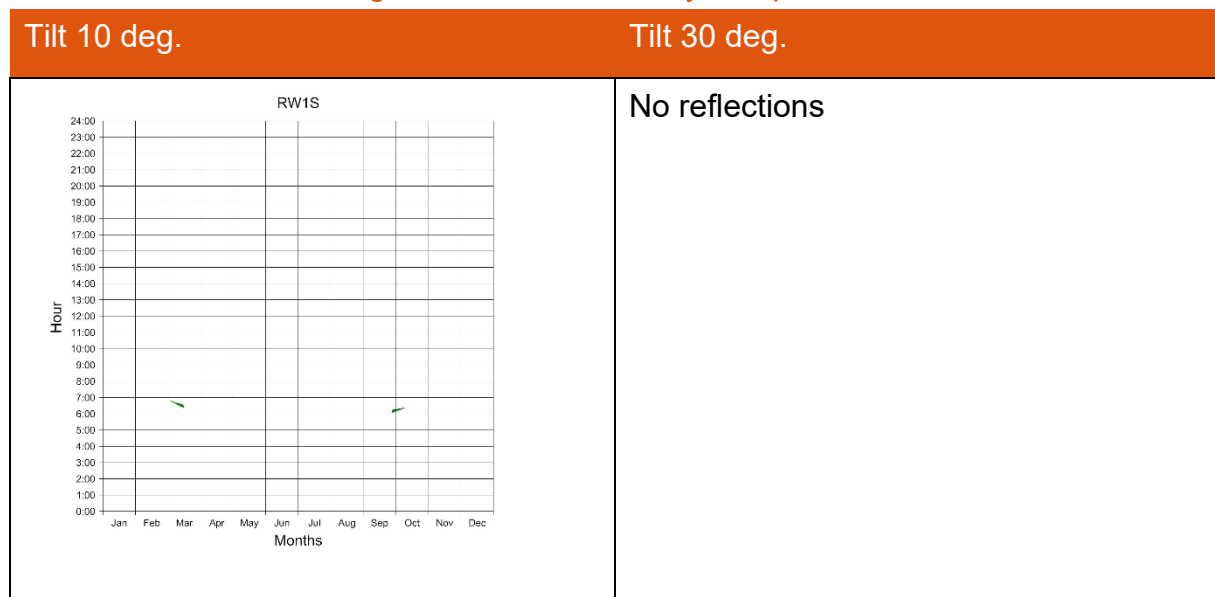


Table B.3: Daily and annual glare frequency for building receptors

Code	Name	Max. minutes/day		Hours/year	
		Tilt 10°	Tilt 30°	Tilt 10°	Tilt 30°
BL01	Pond Farm	57	42	82.8	74.4
BL02	Pond Farm	28	25	81.8	70.6
BL03	Calvert Cottages	10	0	2.5	0.0

Code	Name	Max. minutes/day		Hours/year	
		Tilt 10°	Tilt 30°	Tilt 10°	Tilt 30°
BL04	Calvert Cottages	8	0	1.7	0.0
BL05	Rosehill Farm	0	0	0.0	0.0
BL06	Shepherd's Furze Farm	0	0	0.0	0.0
BL07	Knowlhill Farm	0	0	0.0	0.0
BL08	Finemerehill House	0	0	0.0	0.0
BL09	Dry Leys Farm	0	0	0.0	0.0
BL10	The Ox House	0	0	0.0	0.0
BL11	Hill Cottage Farm	25	0	16.6	0.0
BL12	Hogshaw Farm	24	23	39.0	48.6
BL13	Oak Cottages	25	21	32.2	24.6
BL14	Borshaw Farm	0	0	0.0	0.0
BL15	Unknown	22	22	9.5	10.7
BL16	Staplers Place	22	21	18.5	13.6
BL17	Berry Lees Farm	0	0	0.0	0.0
BL18	Tuckey Farm	0	0	0.0	0.0
BL19	Station House	0	0	0.0	0.0
BL20	Sion Hill Farm	28	23	84.6	68.9
BL21	House in Churchway	0	0	0.0	0.0
BL22	Whitehouse Farm	22	21	9.1	9.2
BL23	Burnwood Farm	48	43	57.9	59.1
BL24	Touchwood	24	0	16.4	0.0
BL25	2 Botyl Road	35	29	80.2	69.8
BL26	12 Botyl Road	26	23	69.3	68.4

Code	Name	Max. minutes/day		Hours/year	
		Tilt 10°	Tilt 30°	Tilt 10°	Tilt 30°
BL27	Botyl Road	30	22	64.3	65.6
BL28	1-23 Orchard Way (odd)	20	21	6.5	7.6
BL29	Muxwell Farm	0	0	0.0	0.0
BL30	Claydon House	0	0	0.0	0.0
BL31	Catherine Farm	13	8	4.3	1.5
BL32	Blackmore Hill Farm Cottages	0	0	0.0	0.0
BL33	4-7 Catherine Cottages	0	0	0.0	0.0
BL34	Winters Tale Farmhouse	0	0	0.0	0.0
BL35	13-17 Brackley Lane	29	25	76.0	67.9
BL36	South Lodge	7	0	1.3	0.0
BL37	The Leys Cottage	27	22	35.6	35.0
BL38	Rookery Farm	0	0	0.0	0.0
BL39	Ricall Farm	25	22	33.3	30.2

Annex C: Glint and Glare Guidance



Solar Photovoltaic and Building Development – Glint and Glare Guidance

Fourth Edition

September 2022

PLANNING SOLUTIONS FOR:

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ADMINISTRATION PAGE

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Revision History		
Issue	Date	Detail of Changes
1	April, 2017	First edition.
2	October, 2018	Second edition. This revision adds a methodology for the assessment of helipad operations whilst adding clarity to the previously presented methodologies through the experience gained in the time between edition 1 and 2. The methodologies have not changed significantly. High-level comments regarding the impact of building developments, particularly façades capable of producing specular reflections, is included within the foreword, which is also a new addition.

Revision History		
Issue	Date	Detail of Changes
3	December, 2020	Third edition. Updated Pager Power details. Updated Literature Review section. Updated significance flow charts for determining the impact of solar reflections for road and dwelling receptors. Further comments on common considerations from railway stakeholders for glint and glare assessments including building and solar photovoltaic developments. Additional details regarding aviation assessments for building developments and the safeguarding of non-typical aviation receptors.
3.1	April, 2021	Update to the impact significance flow charts for road and dwelling receptors.
4	September, 2022	Updated guidance section. Updated glint and glare overall significance flow chart. Updates to impact classifications for roads, dwellings, railways and aviation within the significance flow charts. Further details surrounding aviation receptors following assessment experience and stakeholder responses.

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FOREWORD

Introduction and Background

The number, size and scale of solar photovoltaic (PV) developments continues to rise, with glint and glare assessments often required within the UK, South Africa, USA, Australia, India and elsewhere in the world. The requirement for a glint and glare assessment now extends to building developments with reflective façades. Rapid deployment of PV in the UK between 2010-2015 led to a knowledge gap in the area of glint and glare, with assessments often required without definition of what constitutes a significant impact. Pager Power has been at the forefront of this planning issue with over 250 assessments completed at the time of the publication of first edition of the guidance. Now going into the fourth edition, over 900 international glint and glare assessments have been completed by Pager Power.

The original aim of the glint and glare guidance was to produce a standardised methodology for PV developers, planners and stakeholders to follow. This was well received, adding clarity to a previously unfamiliar planning issue. The second edition, produced over a year and a half later, did not reinvent the assessment methodology for PV, it merely refined and added detail where required based on the experience gained subsequently. The requirement for glint and glare assessments of building developments, specifically those with large reflective façades, had also grown between the first and second edition and therefore further additional information regarding the methodology for assessment was provided.

The third edition refined the guidance and added additional guidance for building developments, specifically in the vicinity of airports and railway infrastructure. The focus remained on the guidance for PV panels, however where required, additional information was presented for building developments. The fourth edition has added a further guidance update and improvements to the way effects are determined, and how the significance of impacts are classified.

This guidance document presents the methodology recommended by Pager Power through assessment experience. It should be used for reference and ideally, the methodology should be agreed with the relevant stakeholder where an assessment is required. There may be cases where the assessment scenario does not match the guidance criteria, in this situation, a pragmatic approach is recommended.

It is understood that this guidance document has now been referred to internationally.

Guidance Basis

Prepared for:

Developers, planners and stakeholders.

Aim:

To provide guidance for assessing the impact of glint and glare from solar photovoltaic (PV) panels and building developments with large reflective façades upon surrounding receptors.

Receptors:

Dwellings (residential amenity), Roads (safety), Rail (safety) and Aviation (safety).

EXECUTIVE SUMMARY

Overview and Purpose

The purpose of this guidance document is to provide solar photovoltaic (PV) and building developers, planners and stakeholders with an assessment process for determining the effects of glint and glare (solar reflections) upon receptors surrounding a proposed solar PV and building development.

Throughout the document, the focus remains on the guidance for PV panels, however where required, additional information is presented for building developments. If a building development is not specifically mentioned, then assume the guidance is not applicable or relevant.

Formal guidance around glint and glare remains somewhat lacking in many cases. This guidance document has therefore been produced to bridge this knowledge gap pertaining to the assessment of glint and glare. The aim is to produce a standardised assessment process for developers, planners and stakeholders to reduce the element of risk associated with glint and glare.

The guidance presented is based on the following:

- Reviews of existing guidance in a variety of areas;
- Glint and glare assessment experience and industry knowledge;
- An overview of available solar reflection studies.

This guidance document is based on knowledge initially gained through analysis within the UK and Irish markets however the methodologies are deemed applicable, and have been used, for worldwide solar PV development and building development.

Key Receptors

Glint and glare can significantly affect nearby receptors under particular conditions. The key receptors with respect to glint and glare are residents in surrounding dwellings, road users, train infrastructure (including train drivers), and aviation infrastructure (including pilots and air traffic controllers). Other receptors do exist, however this guidance considers the four most common receptor types unless otherwise stated.

Modelling Requirements

A geometric glint and glare assessment model must include the following:

- The Earth's orbit around the Sun;
- The Earth's rotation;
- The Earth's orientation;

- The location of the solar PV development or building development including the reflector (solar panel or façade) area;
- The reflector's 3D orientation including azimuth angle of the solar panel or façade (the orientation of the reflectors relative to north and the reflector elevation angle);
- Local topography including receptor and panel or façade heights above mean sea level.

For increased accuracy, the model could account for the following:

- Terrain at the visible horizon;
- Local time zone and daylight savings times;
- Consideration of sunrise and sunset times;
- Determine which solar panels create the solar reflection within the solar PV development;
- Determine what area of the façade create the solar reflection from the building development;
- Azimuth range of the Sun¹ when a solar reflection is geometrically possible;
- Vertical elevation range of the Sun when a solar reflection is geometrically possible;
- High-resolution analysis i.e. undertaking multiple geometric calculations within the given solar PV development or façade area. For example, at intervals of between 1 and 20 metres;
- Consideration of the effect of non-specular reflective surfaces e.g. masonry between glass façades;
- The intensity² of any solar reflection produced.

Assessment Inputs – Receptors

The following paragraphs set out the key distances for identifying receptors and the height data which should be included.

Dwellings within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level within the relevant floor of the dwelling should also be considered. Dwellings are not typically assessed for building developments.

National roads, or those with greater significance, within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and

¹ The azimuth range is the angle between the Sun and North, measured clockwise around the receptor's horizon. The Sun azimuth range shows the location of the Sun when a geometric solar reflection is possible. Therefore, it is possible to determine whether the Sun and the solar reflection are both likely to be visible to a receptor.

² In W/cm² at the retina, for example.

an additional height to account for the solar panel and eye level of a road user should also be considered. Roads are not typically assessed for building developments.

Where railway infrastructure is located within approximately 100m of a proposed solar PV or building development that may have a view of the PV panels, an assessment should be undertaken. Train drivers out to 500m should be assessed. Any signals, crossings or vital railway infrastructure within 500m that could be affected by glare should be assessed especially where railway signal utilises incandescent bulb³ technology and/or where no hood is attached. Terrain heights and an additional height to account for the solar panel/façade and eye level of a train driver or the height of a railway signal should also be considered.

Aviation receptors out to 30km⁴ from a proposed PV development should be considered to determine the requirement for assessment, if any. A full technical assessment is usually undertaken for those developments located within 10km of an aerodrome or if specifically requested by the aerodrome safeguarding team. The typical receptors include the Air Traffic Control (ATC) tower and a 2-mile approach path for the relevant runway approaches. Additional receptors may be included where a solar reflection may be deemed a hazard to safety e.g. helipad approaches and the visual manoeuvring area (VMA). Aviation receptors for building developments are the same.

Assessment Significance

Determining the significance of a solar reflection varies for each receptor type. In general, the significance criteria for glint and glare effects are as follows:

- No Impact – A solar reflection is not geometrically possible or will not be visible from the assessed receptor. No mitigation required;
- Low – A solar reflection is geometrically possible however any impact is considered to be small such that mitigation is not recommended e.g. intervening screening will limit the view of the reflecting solar panels significantly or the glare time per year is considered negligible. No mitigation recommended;
- Moderate – A solar reflection is geometrically possible and visible however it occurs under conditions that do not represent a worst-case scenario e.g. a solar reflection originates from a less sensitive location. Mitigation recommended;
- High – A solar reflection is geometrically possible and visible under conditions that will produce a significant impact. Mitigation will be required if the proposed development is to proceed.

There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

³ Non-LED.

⁴ Aviation stakeholders can and have requested a glint and glare assessment beyond 30km.

See the following sections where the process for determining the significance of a solar reflection is described for each receptor type:

- Section 6 – Dwellings;
- Section 7 – Road infrastructure;
- Section 8 – Railway infrastructure;
- Section 9 – Aviation infrastructure.

In each section, the process for determining the significance of a solar reflection is described comprehensively.

Guidance Conclusions

This guidance should be followed to ensure comprehensive assessment of solar PV and building developments with respect to glint and glare. This guidance is applicable for solar PV and building development anywhere in the world.

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GLOSSARY

Term	Definition
Aerodrome	A defined area on land or water (including any buildings, installations, and equipment) intended to be used either wholly or in part for the arrival, departure, and surface movement of aircraft ⁵ .
Approach Path	The descent path of an aircraft as it comes in for landing.
ATC Tower	Air Traffic Control tower – used by air traffic controllers to observe and direct aviation activity at or near to an aerodrome.
Azimuth Angle	The angle the solar panel faces relative to north (0/360 degrees).
CAA	Civil Aviation Authority.
Diffuse Reflection	The reflection of light from a surface such that the incident light is reflected at many angles rather than at just one angle.
Elevation Angle	The angle of the solar panel relative to 0 degrees (the horizontal or flat).
FAA	Federal Aviation Administration.
Façade	The reflective surface of a building development
Glare	A continuous source of bright light.
Glint	A momentary flash of bright light.
Glint and Glare	As above. Interchangeably used with the term ‘solar reflection’ where the specific type of reflection is not necessary.
IAA	Irish Aviation Authority.
Incandescent Light Bulb	An incandescent light bulb is an electric light with a wire filament heated to a high temperature. An electric current is passed through it until it glows with visible light.

⁵ International Civil Aviation Organization (ICAO) Documents, Aerodrome Standards, Aerodrome Design and Operations. Annex 14 to The Convention on International Civil Aviation (Chicago Convention), Volume I- Aerodrome Design and Operations under Definitions.

Term	Definition
Incident Solar Reflection	The solar reflection from the solar panel appears visible and close to the location of the Sun, such that both the solar reflection and the Sun originate and are visible from a receptor's viewpoint simultaneously. The angle between the reflected light and the perpendicular (or normal) to the surface (solar panel) is the angle of incidence.
LED	A light-emitting diode (LED). It is a semiconductor diode, which glows when a voltage is applied. LED signals are brighter and more efficient than incandescent bulbs and normally do not have a reflective mirror.
Level Crossing	A crossing where (typically) a road passes over a railway line.
Level Crossing Warning Lights (LCWL)	The system of lights located next to a level crossing on a railway line, used to warn road users from crossing.
National Roads: Typically A Roads (UK) or N Roads (Ireland)	Typically a road with a one or more carriageways with a maximum speed limit of up to 60mph or 70mph (UK A Road) or 100kph (Ireland N Road). These roads typically have fast moving vehicles with moderate to busy traffic density. Other road designations or maximum speed limits may apply internationally.
Major National Roads: Typically a motorway	Typically a road with a minimum of two carriageways with a maximum speed limit of up to 70mph (UK) or 120kph (Ireland). These roads typically have fast moving vehicles with busy traffic. Other road designation or maximum speed limits may apply internationally.
Local Roads	Typically roads and lanes with the lowest traffic densities. Speed limits vary.
Normal	The mathematical term used to define the line at right angles to a reflector i.e. a solar panel.
Potential for temporary after-image	The likelihood of a solar reflection continuing to appear in one's vision after the exposure to the original image has ceased.
Railway Signal	A light or physical signalling system located beside a railway line. Used to indicate to a train driver a particular order.

Term	Definition
Receptor	A potential viewer of glint and glare effects. They may be located in a dwelling, as a pilot in a plane, as a road user, train operator etc..
Regional Roads B Roads (UK) or R Roads (Ireland)	Typically a single carriageway with a maximum speed limit of up to 60mph (UK B Road) or 80kph (Ireland R Road). The speed of vehicles will vary with a typical traffic density of low to moderate. Other road designations or maximum speed limits may apply internationally.
Runway Threshold	The beginning of the physical runway surface.
SGHAT	Solar Glare Hazard Analysis Tool - solar glint and glare model designed by Sandia National Laboratory, specifically for aviation and recommended by the FAA.
Signal Hood	A signal hood is located on a lit railway signal to screen the light from direct sunlight.
Shadow Flicker	Refers to the sunlight flickering effect caused when rotating wind turbine blades periodically cast shadows over neighbouring properties through small openings such as windows.
Solar Reflection	Also referred to as glint or glare. Used interchangeably to describe glint or glare where the type of solar reflection is not necessary.
Specular Reflection	The mirror-like reflection of light from a surface, in which light from a single incoming direction is reflected into a single outgoing direction.

Glossary

PAGER POWER COMPANY PROFILE

Company Background

Pager Power is a dedicated consultancy company based in Suffolk, UK. The company has undertaken projects in 54 countries within Europe, Africa, America, Asia and Australia.

The company comprises a team of experts to provide technical expertise and guidance on a range of planning issues for large and small developments.

Pager Power was established in 1997. Initially the company focus was on modelling the impact of wind turbines on radar systems.

Over the years, the company has expanded into numerous fields including:

- Renewable energy projects.
- Building developments.
- Aviation and telecommunication systems.

Pager Power prides itself on providing comprehensive, understandable and accurate assessments of complex issues in line with national and international standards. This is underpinned by its custom software, longstanding relationships with stakeholders and active role in conferences and research efforts around the world.

Pager Power's assessments withstand legal scrutiny and the company can provide support for a project at any stage.

Pager Power's Experience

Pager Power has undertaken over 900 Glint and Glare Assessments in the United Kingdom and internationally.

The studies have included assessment of civil and military aerodromes, railway infrastructure and other ground-based receptors including roads and dwellings.

1 OVERVIEW

Introduction

1.1 Glint and glare is a planning consideration brought about through the rise and rapid deployment of solar photovoltaic (PV) development. There has been a lack of official guidance documents for developers, planners or stakeholders to follow and therefore Pager Power has produced this document to assist with this planning consideration.

1.2 The requirement for a glint and glare assessment has now extended to new building developments, or indeed any project which has the potential to produce significant glare through a specular solar reflection.

1.3 Whilst general planning guidance for solar PV development has been established, there is no specific planning guidance, in the UK and Ireland, for assessing the effects of glint and glare on surrounding receptors. There also remains no standardised guidance in regard to glare from building developments.

1.4 This guidance document has specific focus on the UK and Irish markets however the methodologies are deemed applicable for worldwide solar PV or building development.

Purpose

1.5 This guidance has been produced for developers, planners and stakeholders.

1.6 The aims of this guidance are as follows:

- To bridge the knowledge gap for all stakeholders regarding glint and glare (solar reflections) from solar PV and building developments;
- To produce a standardised and universally agreed methodology for assessing the impact of glint and glare upon receptors surrounding a proposed solar PV and building development;
- To ensure the proper and safe development of renewable energy schemes and building projects in the UK, Ireland and internationally with respect to glint and glare.

1.7 A standardised process will reduce risk for all stakeholders of a proposed solar PV or building development.

1.8 The guidance is based on industry knowledge, consultation and experience.

Scope

1.9 Glint and glare is referenced within guidance documents⁶ throughout the UK and Internationally, however a specific methodology for assessing, contextualising and determining the impact of solar glint and glare are not provided for many receptor types. Aviation is covered within Federal Aviation Administration (FAA) guidance from the USA, however this is not strictly applicable outside of the USA (though many aviation authorities do refer to it).

1.10 This guidance document aims to present a standardised methodology for assessing glint and glare for surrounding receptors, this includes:

- Residents in surrounding dwellings;
- Road users on surrounding roads;
- Railway infrastructure (including train drivers);
- Aviation infrastructure (including pilots and air traffic controllers).

Glint and Glare Definition

1.11 The reflective properties of solar PV panels vary from different manufacturers. Whilst solar panels vary in their reflectivity with some claiming 'anti-glare' properties, no solar panel absorbs 100% of the incoming light. Therefore, any solar PV panel has the potential to produce a solar reflection. The relative absorptive properties of a solar panel should be considered on a case-by-case basis.

1.12 The reflective properties of glass are similar to PV panels, with both producing reflections of similar intensities.

1.13 The definition of glint and glare⁷ is as follows:

- Glint – a momentary flash of bright light;
- Glare – a continuous source of bright light.

1.14 In context, glint will be witnessed by moderate to fast moving receptors whilst glare would be encountered by static or slow moving receptors with respect to a solar farm. The term 'solar reflection' is used to refer to both reflection types i.e. glint and glare.

⁶ Overview of the associated guidance is presented in Section 3.

⁷ These definitions are aligned with the Draft National Policy Statement for Renewable Energy Infrastructure (in the UK) and the Federal Aviation Administration (FAA) in the United States of America.

2 CONSULTATION

Consultation Overview

Consultation with key stakeholders is essential to ensure any concerns are suitably addressed. A list of some of the key stakeholders pertaining to safety related glint and glare issues is presented in Table 1 below.

Party	Comment
UK Civil Aviation Authority (CAA)	Key stakeholders pertaining to safety.
UK Ministry of Defence (MOD)	
Irish Department of Defence (DOD)	
Irish Aviation Authority (IAA)	
Network Rail	
Irish Rail	
Relevant Highways Agencies including: • Highways England; • Transport Infrastructure Ireland.	

Table 1 Stakeholder consultation

3 LITERATURE REVIEW

Overview

3.1 A review of the available guidance and studies pertaining to solar PV developments and glint and glare is presented in this section.

Planning Guidance

UK Planning Practice Guidance

3.2 There is guidance from other nations within the UK. The following relates to English guidance only. In many instances the guidance is similar both within the UK and internationally, with no specific methodology defined.

3.3 English Planning Practice Guidance dictates that a glint and glare assessment is required in some instances. The guidance for 'Renewable and low carbon energy'⁸ dictates the following with respect to glint and glare. Note only the relevant information is presented.

The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.

Particular factors a local planning authority will need to consider include:

- *the proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on neighbouring uses and aircraft safety;*
- *the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;*
- *great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset;*
- *the potential to mitigate landscape and visual impacts through, for example, screening with native hedges.*
- *The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the*

⁸ UK Planning Practice Guidance, 2015. Renewable and low carbon energy - What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic Farms? Last accessed 01.07.2020.

case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.

3.4 The UK planning guidance does not provide a specific methodology for assessing the impact of glint and glare.

Draft National Policy Statement for Renewable Energy Infrastructure

3.5 The Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)⁹ sets out the primary policy for decisions by the Secretary of State for nationally significant renewable energy infrastructure. Section 2.52 states:

‘2.52.1 Solar panels may reflect the sun’s rays, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.

2.52.2 In some instances, it may be necessary to seek a glint and glare assessment as part of the application. This may need to account for ‘tracking’ panels if they are proposed as these may cause differential diurnal and/or seasonal impacts. The potential for solar PV panels, frames and supports to have a combined reflective quality should be assessed. This assessment needs to consider the likely reflective capacity of all of the materials used¹⁰ in the construction of the solar PV farm.

2.52.3 Applicants should consider using, and in some cases the Secretary of State may require, solar panels to be of a non-glare/ non-reflective type and the front face of the panels to comprise of (or be covered) with a non-reflective coating for the lifetime of the permission.

2.52.4 Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes and motorists.

2.52.5 There is no evidence that glint and glare from solar farms interferes in any way with aviation navigation or pilot and aircraft visibility or safety. Therefore, the Secretary of State is unlikely to have to give any weight to claims of aviation interference as a result of glint and glare from solar farms.’

3.6 Consultation to determine whether EN-3 provides a suitable framework to support decision making for nationally significant energy infrastructure ended in November 2021. Pager Power is aware that aviation stakeholders were not consulted prior to the publication of the draft

⁹ Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), Department for Business, Energy & Industrial Strategy, date: September 2021, accessed on: 01/11/2021.

¹⁰ In Pager Power’s experience, the solar panels themselves are the overriding source of specular reflections which have the potential to cause significant impacts upon safety or amenity.

policy and understands that they will still request a glint and glare assessment on the basis that glare may lead to impact upon aviation safety. It is possible that the draft policy will change in light of the consultation responses from aviation stakeholders.

3.7 Finally, it should be noted that the EN-3 relates solely to nationally significant renewable energy infrastructure and therefore does not apply to all planning applications for solar developments.

Road Safety Guidance

UK Highway Code

3.8 Information relating to solar glare and general guidelines for safer driving is presented in the UK's Highway Code¹¹. Each country will have their own guidance with respect to road safety. The relevant information is presented below for reference. Note only the relevant information is presented.

93 Slow down, and if necessary stop, if you are dazzled by bright sunlight.

125 The speed limit is the absolute maximum and does not mean it is safe to drive at that speed irrespective of conditions. Driving at speeds too fast for the road and traffic conditions is dangerous. You should always reduce your speed when:

- *the road layout or condition presents hazards, such as bends;*
- *sharing the road with pedestrians, cyclists and horse riders, particularly children, and motorcyclists;*
- *weather conditions make it safer to do so;*
- *driving at night as it is more difficult to see other road users.*

146 Adapt your driving to the appropriate type and condition of road you are on. In particular:

- *do not treat speed limits as a target. It is often not appropriate or safe to drive at the maximum speed limit;*
- *take the road and traffic conditions into account. Be prepared for unexpected or difficult situations, for example, the road being blocked beyond a blind bend. Be prepared to adjust your speed as a precaution;*
- *where there are junctions, be prepared for road users emerging;*
- *in side roads and country lanes look out for unmarked junctions where nobody has priority;*
- *be prepared to stop at traffic control systems, road works, pedestrian crossings or traffic lights as necessary;*
- *try to anticipate what pedestrians and cyclists might do. If pedestrians, particularly children, are looking the other way, they may step out into the road without seeing you.*

¹¹ The Highway Code, 2016. Department of Transport, UK Government. Last accessed 01.07.2020.

3.9 Different countries have various highway standards that must be followed. The UK Highway Code states that a driver should be aware of particular hazards such as glare from the Sun, and should adjust their driving style appropriately. Solar panels reflect sunlight producing solar reflections under specific conditions, therefore it is advised that this guidance is considered.

Railway Guidance

3.10 It is understood that that railway guidance with respect to signalling has changed¹². The following historical guidance is therefore presented for reference only.

UK Network Rail Guidance

3.11 This section provides an overview of the relevant railway guidance with respect to the siting of signals on railway lines. Network Rail is the stakeholder of the UK's railway infrastructure¹³. Generally, a railway operator's concerns would likely to relate to the following:

- The development producing a solar reflection that affects train drivers;
- The development producing a solar reflection towards level crossing warning lights (LCWL) or level crossings; and
- The development producing a solar reflection that affects railway signals.

3.12 The railway guidelines are presented below. The extract is taken from section 3.2 of the 'Guidance on Signal Positioning and Visibility' which details the visibility of signals, train drivers' field of vision and the implications with regard to signal positioning. Note only the relevant information is presented.

3.2 The visibility of signals

3.2.1 Overview

The effectiveness of an observer's visual system in detecting the existence of a target will depend upon the object's position in the observer's visual field, its contrast with its background, its luminance properties, and the observer's adaptation to the illumination level of the environment. It is also influenced by the processes relating to colour vision, visual accommodation, and visual acuity. Each of these issues is described below.

3.2.2 Field of vision

The field of vision, or visual field, is the area of the visual environment that is registered by the eyes when both eyes and head are held still. The normal extent of the visual field is approximately 135 degrees in the vertical plane and 200 degrees in the horizontal plane.

The visual field is normally divided into central and peripheral regions: the central field being the area that provides detailed information. This extends from the central point (0 degrees) to

¹² Known to Pager Power as of August 2020.

¹³ Guidance on Signal Positioning and Visibility, December 2003. Railway Group Guidance Note. Last accessed 28.03.2017.

approximately 30 degrees at each eye. The peripheral field extends from 30 degrees out to the edge of the visual field.

Objects are seen more quickly and identified more accurately if they are positioned towards the centre of the observer's field of vision, as this is where our sensitivity to contrast is highest. Peripheral vision is particularly sensitive to movement and light.

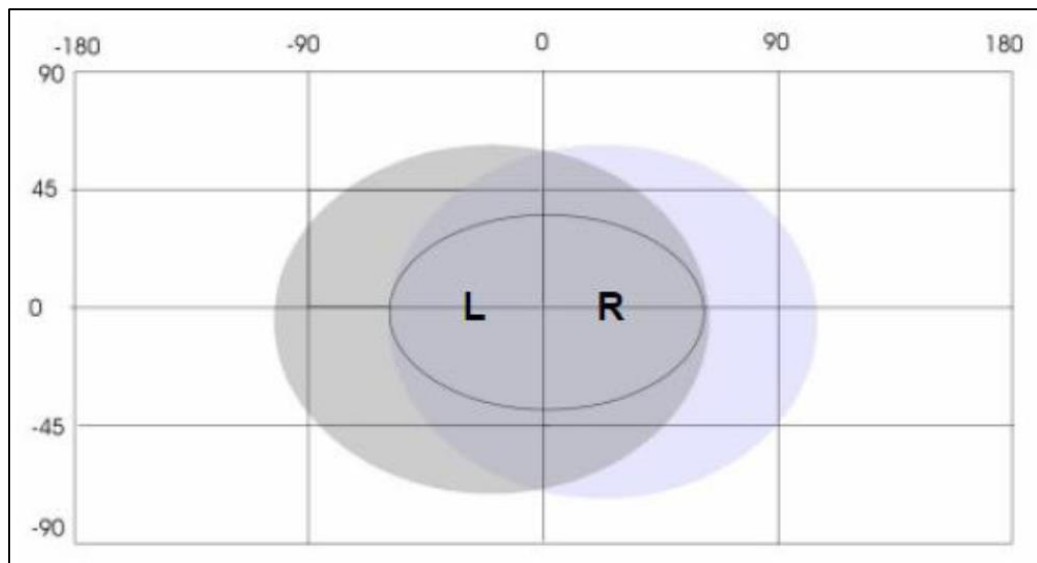


Figure 1 Field of view

In the diagram above, the two shaded regions represent the view from the left eye (L) and the right eye (R) respectively. The darker shaded region represents the region of binocular overlap. The oval in the centre represents the central field of vision.

Research has shown that vehicle drivers search for signs/signals towards the centre of the field of vision. As approach speed increases, drivers demonstrate a tunnel vision effect and focus only on objects in a field of $+ 8^\circ$ from the direction of travel

3.2.2.1 Field of vision

Drivers become increasingly dependent on central vision for signal detection at increasing train speeds, and even minor distractions can reduce the visibility of the signal if it is viewed towards the peripheral field of vision. (D I)

Because of our sensitivity to movement in the peripheral field, the presence of clutter to the sides of the running line, for example, fence posts, lamp-posts, traffic, or non-signal lights, such as house, factory or security lights, can be highly distracting. (D I)

3.2.2.2 Implications

Signals should be at a height and distance from the running line that permits them to be viewed towards the centre of the field of vision. (D)

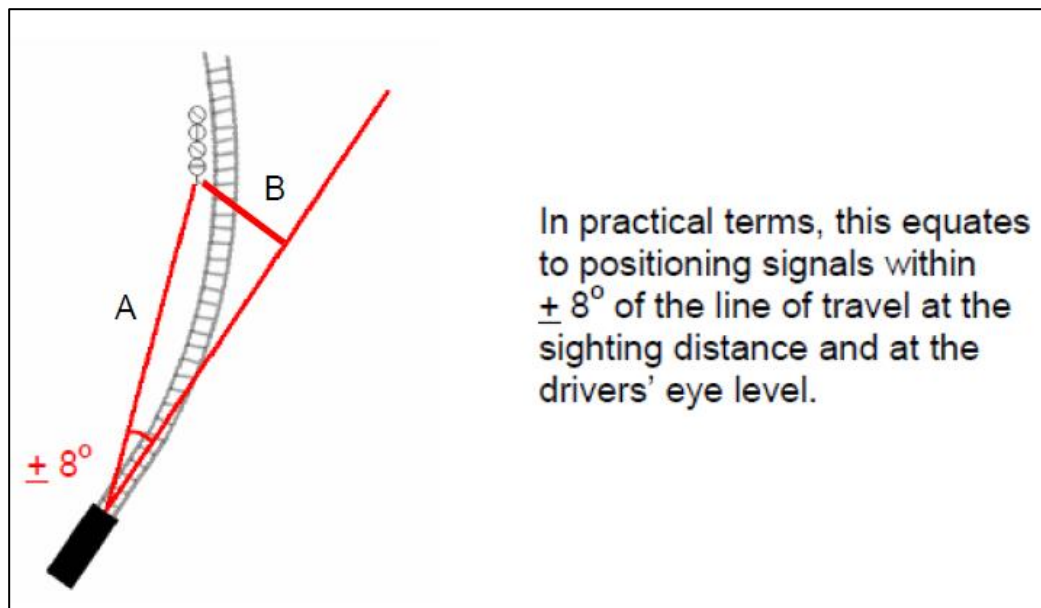


Figure 2 Signal positioning

'Car stop' signs should be positioned such that, if practicable, platform starting signals and 'OFF' indicators can be seen in the driver's central field of vision. (D)

If possible, clutter and non-signal lights in a driver's field of view should be screened off or removed so that they do not cause distraction. (D I)

The distance at which the 8° cone along the track is initiated is dependent on the minimum reading time and distance which is associated to the speed of trains along the track. The extract below is taken from section B5 (pages 8-9) of the guidance which details the required minimum reading time for a train driver when approaching a signal. Note only the relevant information is presented.

'B5.2.2 Determining the assessed minimum reading time

GE/RT8037

The assessed minimum reading time shall be no less than eight seconds travelling time before the signal.

The assessed minimum reading time shall be greater than eight seconds where there is an increased likelihood of misread or failure to observe. Circumstances where this applies include, but are not necessarily limited to, the following:

- a) the time taken to identify the signal is longer (for example, because the signal being viewed is one of a number of signals on a gantry, or because the signal is viewed against a complex background)
- b) the time taken to interpret the information presented by the signal is longer (for example, because the signal is capable of presenting route information for a complex layout ahead)

c) there is a risk that the need to perform other duties could cause distraction from viewing the signal correctly (for example, the observance of lineside signs, a station stop between the caution and stop signals, or DOO (P) duties)

d) the control of the train speed is influenced by other factors (for example, anticipation of the signal aspect changing).

The assessed minimum reading time shall be determined using a structured format approved by the infrastructure controller.

3.13 Network Rail guidance does not specifically reference the effect of glint and glare from solar PV developments on railway infrastructure. Nonetheless, the guidance references the importance of signal visibility and driver awareness, hence the guidance has merit when determining whether glint and glare will have a significant impact on railway safety.

Aviation Guidance

UK CAA Guidance

3.14 The UK Civil Aviation Authority (CAA) issued interim guidance relating to Solar Photovoltaic Systems (SPV) on 17 December 2010 and was subject to a CAA information alert 2010/53. The formal policy was cancelled on September 7th, 2012¹⁴ however it remains the most recent and comprehensive CAA guidance produced to date. The CAA guidance is presented in the section below. Note only the relevant information is presented.

Interim CAA Guidance - Solar Photovoltaic Systems

BACKGROUND

1 Airport interest in solar energy is growing rapidly as a way to reduce operating costs and to demonstrate a commitment to renewable energy and sustainable development. In response, the CAA is seeking to develop its policy on the installation of Solar Photovoltaic (SPV) Systems and their impact on aviation. In doing so, it is reviewing the results of research having been carried out in the United States by the Federal Aviation Administration (FAA) culminating in the publication of Technical Guidance for Evaluating Solar Technologies on Airports¹⁵ and also reviewing guidance issued by other National Aviation Safety Administrations and Authorities on this subject.

2 On completion of the review, the CAA, together with the assistance of other aviation stakeholders, will develop a policy and provide formal guidance material on the installation of SPV, principally on or in the vicinity¹⁶ of licensed aerodromes but will also include guidance on installations away from aerodromes (or 'en-route'¹⁷). This document therefore constitutes interim CAA guidance until a formal policy has been developed.

DISCUSSION

3 At present the key safety issue is perceived to be the potential for reflection from SPV to cause glare, dazzling pilots or leading them to confuse reflections with aeronautical lights. Whilst permission is not required from the CAA for any individual or group to shine or reflect a light or lights into the sky, SPV developers should be aware of the requirements to comply with the Air Navigation Order (ANO) 2009. In particular, developers and Local Planning Authorities (LPA) should be cognisant of the following articles of the ANO with respect to any SPV development regardless of location:

- Article 137 – Endangering safety of an aircraft.

¹⁴ CAA, 2010. Interim CAA Guidance - Solar Photovoltaic Systems. Last accessed 28.03.2017.

¹⁵ Discussed in the following section.

¹⁶ 'In this context, the term "in the vicinity" refers to officially safeguarded aerodromes noted in the Planning Circulars (see Paragraph 10) and a distance of up to 15km from the 'Aerodrome Reference Point' or the centre of the longest runway.'

¹⁷ 'SPV installations proposed further than 15km from an aerodrome are considered "en-route" developments, and may still require consultation with the CAA for an assessment on the impact, if any, to CNS equipment.'

- Article 221 – Lights liable to endanger.
- Article 222 – Lights which dazzle or distract.

4 The potential for SPV installations to cause electromagnetic or other interference with aeronautical Communications Navigational and Surveillance equipment (CNS) must be considered by the SPV developer, in coordination with the CAA, the aerodrome Air Traffic Service provider (ATS), the Air Navigation Service Provider (ANSP) and/or NATS and the MoD, as required.

5 Where SPV systems are installed on structures that, for example, extend above the roofline of tall buildings (either on, or 'off-aerodrome'), or where they are installed in the vertical plane (on plinths or towers), then there may be the potential for creating an obstacle hazard to aircraft and - in addition to the potential for creating turbulence hazard to aircraft - any infringement of the aerodrome Obstacle Limitation Surfaces (OLS) shall also need to be considered by the Aerodrome Licence Holder (ALH).

6 For all planned SPV installations it is best practice for the developer to consult with the operators of nearby aerodromes before any construction is initiated.

7 An ALH, in agreement with their LPA, may wish to initiate procedures so that it is only consulted on SPV planning applications at shorter distances from the aerodrome (for example within a 5 km radius), or at distances that would limit SPV development from within the aircraft operating visual circuit; however, this is at the discretion of the ALH and no CAA approval or endorsement of this decision is necessary.

RECOMMENDATIONS

8. It is recommended that, as part of a planning application, the SPV developer provide safety assurance documentation (including risk assessment) regarding the full potential impact of the SPV installation on aviation interests.

9. Guidance on safeguarding procedures at CAA licensed aerodromes is published within CAP 738 Safeguarding of Aerodromes and advice for unlicensed aerodromes is contained within CAP 793 Safe Operating Practices at Unlicensed Aerodromes.

10. Where proposed developments in the vicinity of aerodromes require an application for planning permission the relevant LPA normally consults aerodrome operators or NATS when aeronautical interests might be affected. This consultation procedure is a statutory obligation in the case of certain major airports, and may include military establishments and certain air traffic surveillance technical sites. These arrangements are explained in Department for Transport Circular 1/2003 and for Scotland, Scottish Government Circular 2/2003.

11. In the event of SPV developments proposed under the Electricity Act, the relevant government department should routinely consult with the CAA. There is therefore no requirement for the CAA to be separately consulted for such proposed SPV installations or developments.

12. If an installation of SPV systems is planned on-aerodrome (i.e. within its licensed boundary) then it is recommended that data on the reflectivity of the solar panel material should be included in any assessment before installation approval can be granted. Although approval for installation is the responsibility of the ALH, as part of a condition of a CAA Aerodrome Licence, the ALH is required to obtain prior consent from CAA Aerodrome Standards Department before any work is begun or approval to the developer or LPA is granted, in accordance with the procedures set out in CAP 791 Procedures for Changes to Aerodrome Infrastructure.

13. During the installation and associated construction of SPV systems there may also be a need to liaise with nearby aerodromes if cranes are to be used; CAA notification and permission is not required.

14. The CAA aims to replace this informal guidance with formal policy in due course and reserves the right to cancel, amend or alter the guidance provided in this document at its discretion upon receipt of new information.

15. Further guidance may be obtained from CAA's Aerodrome Standards Department via aerodromes@caa.co.uk.

3.15 CAP 738¹⁸ Safeguarding of Aerodromes is a later CAA document which details more on the specifics of safeguarding against solar developments. Key excerpts from the guidance are presented in the section below.

Safeguarding Scope

...

Who:

6. Aerodromes holding a certificate based on European Union (EU) regulation or a licence based on UK regulation are required by the CAA to ensure they have a system in place to safeguard their aerodrome against the growth of obstacles; or activities that may present a hazard to aircraft operations (e.g encourage wildlife, glare, lighting, building induced turbulence, etc). Responsibility for all safeguarding activities at these aerodromes' rests with the aerodrome operator. Government advice is that non-licensed sites are also encouraged to have a system of safeguarding in place with their Local Planning Authority (LPA).

...

What is Aerodrome Safeguarding

1.1 Safeguarding is the process by which the Aerodrome Operator can, in consultation with the Local Planning Authority (LPA) and within their capability, protect the environment surrounding the Aerodrome from developments and activities that have the potential to impact on the

¹⁸ CAA, CAP 738 Safeguarding of Aerodromes - 2020. Last accessed 15.08.2022.

aerodrome's safe operation. Aerodrome safeguarding covers several aspects. Its purpose is to protect:

...

h) aircraft from the risk from glint and glare, e.g. solar panels.

...

3. Calculated height of the transitional surface at that point is 33.7m, therefore giving a clearance of 4.7m between the height of the structure and the height of the transitional surface. There are no safeguarding objections, but consider a crane condition, lighting condition (including glint and glare) and landscaping condition in the response to the Planning Authority, as well as the likelihood of building induced turbulence due to the shape and location of the structure.

...

APPENDIX C

Solar Photovoltaic Cells Policy

1. In 2010 the CAA published interim guidance on Solar Photovoltaic Cells (SPCs). At that time, it was agreed that we would review our policy based on research carried out by the Federal Aviation Authorities (FAA) in the United States, in addition to reviewing guidance issued by other National Aviation Authorities. New information and field experience, particularly with respect to compatibility and glare, has resulted in the FAA reviewing its original document 'Technical Guidance for Evaluating Selected Solar Technologies on Airports', which is likely to be subject to change, see link;

<https://www.federalregister.gov/documents/2013/10/23/2013-24729/interimpolicy-faa-review-of-solar-energy-system-projects-on-federally-obligated-airports>

2. In the United Kingdom there has been a further increase in SPV cells, including some located close to aerodrome boundaries; to date the CAA has not received any detrimental comments or issues of glare at these established sites. Whilst this early indication is encouraging, those responsible for safeguarding should remain vigilant to the possibility.

3.16 The CAA Guidance does not provide a methodology for assessing the effects of glint and glare on aviation infrastructure. Many aviation stakeholders under the umbrella of the CAA in the UK utilise the US Federal Aviation Administration (FAA) guidance presented on the following page. It is known that other countries internationally recommend the FAA guidance and it remains the most detailed methodology for assessing glint and glare internationally. The FAA guidance is presented in the following subsection.

US FAA Guidance

3.17 The most comprehensive guidelines available for the assessment of solar PV developments near aerodromes were produced initially in November 2010 by the United States FAA and updated in 2013.

3.18 The 2010 document is entitled 'Technical Guidance for Evaluating Selected Solar Technologies on Airports'¹⁹.

3.19 The 2013 version is entitled 'Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports'²⁰.

3.20 The 2018 version is entitled 'Technical Guidance for Evaluating Selected Solar Technologies on Airports'²¹ and is version 1.1 of the 2013 edition. The key changes are as follows:

Version 1.1 (April 2018):

o Updated Section 3.1.2, Reflectivity, to incorporate the latest information about evaluating solar glint and glare.

o Updated corresponding references to glare throughout the document.

o Clarified the relationship between solar energy and the FAA's Voluntary Airport Low Emissions (VALE) program in Section 5.3.2.

o Added information about the FAA's Airport Energy Efficiency Program to Section 5.3.3.

o Updated FAA Contact information on Appendix A (where appropriate).

3.21 A final policy entitled 'Federal Aviation Administration Policy: Review of Solar Energy System Projects on Federally-Obligated Airports'²² was released in 2021, which superseded the all previous guidance.

3.22 Key excerpts²³ from the FAA guidance produced in 2018 are presented in the following section.

16. Abstract

Airport interest in solar energy is growing rapidly as a way to reduce airport operating costs and to demonstrate a commitment to sustainable development. In response, the Federal Aviation Administration (FAA) has prepared Technical Guidance for Evaluating Selected Solar

¹⁹ FAA, 2010. Technical Guidance for Evaluating Selected Solar Technologies on Airports. Last accessed 28.03.2017.

²⁰ FAA, 2013. Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports. Last accessed 28.03.2017.

²¹ FAA, 2018. Technical Guidance for Evaluating Selected Solar Technologies on Airports. Last accessed 06.07.2020.

²² FAA, 2021. Federal Aviation Administration Policy: Review of Solar Energy System Projects on Federally-Obligated Airports. Last accessed 08/12/2021.

²³ Edited to include only key information with respect to assessing glint and glare from solar PV developments.

Technologies on Airports to meet the regulatory and informational needs of the FAA Airports organization and airport sponsors.

For airports with favorable solar access and economics, this report provides a checklist of FAA procedures to ensure that proposed photovoltaic or solar thermal hot water systems are safe and pose no risk to pilots, air traffic controllers, or airport operations. Case studies of operating airport solar facilities are provided, including Denver International, Fresno Yosemite International, and Albuquerque International Sunport.

...

Preface

Over 15 airports around the country are operating solar facilities and airport interest in solar energy is growing rapidly. In response, the Federal Aviation Administration (FAA) has prepared this report, Technical Guidance for Evaluating Selected Solar Technologies on Airports, to meet the regulatory and information needs of FAA personnel and airport sponsors in evaluating airport solar projects.

The guidance is intended to provide a readily usable reference for FAA technical staff who review proposed airport solar projects and for airport sponsors that may be considering a solar installation. It addresses a wide range of topics including solar technology, electric grid infrastructure, FAA safety regulations, financing alternatives, and incentives.

Airport sponsors are interested in solar energy for many reasons. Solar technology has matured and is now a reliable way to reduce airport operating costs. Environmentally, solar energy shows a commitment to environmental stewardship, especially when the panels are visible to the traveling public. Among the environmental benefits are cleaner air and fewer greenhouse gases that contribute to climate change. Solar use also facilitates small business development and U.S. energy independence.

While offering benefits, solar energy introduces some new and unforeseen issues, like possible reflectivity and communication systems interference. The guidance discusses these issues and offers new information that can facilitate FAA project reviews, including a flow chart of FAA procedures to ensure that proposed systems are safe and pose no risks to pilots, air traffic controllers, or airport operations.

The guidance includes case studies of operating solar projects at Denver International, Fresno Yosemite International, Metropolitan Oakland International, Meadows Field (Bakersfield), and Albuquerque International Sunport. Each case study highlights a particular area of interest such as the selected technology, siting considerations, financing, and regulatory requirements.

...

1 AIRPORTS AND SOLAR ENERGY: CHARTING A COURSE

Though solar energy has been evolving since the early 1990's as a mainstream form of renewable energy generation, the expansion in the industry over the past 10 years and corresponding decrease in prices has only recently made it a practical consideration for airports.

Solar energy presents itself as an opportunity for FAA and airports to produce on-site electricity and to reduce long-term electricity use and energy costs. While solar energy has many benefits, it does introduce some new and unforeseen issues, like possible glare (also referred to as reflectivity) and communication systems interference, which have complicated FAA review and approval of this technology. This guide discusses such issues and how FAA reviews for solar projects can be streamlined and standardized to a greater extent.

...

3.1.2 Reflectivity

Reflectivity refers to light that is reflected off surfaces. The potential effects of reflectivity are glint (a momentary flash of bright light) and glare (a continuous source of bright light). These two effects are referred to hereinafter as “glare,” which can cause a brief loss of vision, also known as flash blindness.

FAA Order 7400.2, *Procedures for Handling Airspace Matters*, defines flash blindness as “generally, a temporary visual interference effect that persists after the source of illumination has ceased.”

The amount of light reflected off a solar panel surface depends on the amount of sunlight hitting the surface, its surface reflectivity, geographic location, time of year, cloud cover, and solar panel orientation. As illustrated on Figure 16²⁴, flat, smooth surfaces reflect a more concentrated amount of sunlight back to the receiver, which is referred to as specular reflection. The more a surface is polished, the more it shines. Rough or uneven surfaces reflect light in a diffused or scattered manner and, therefore, the light will not be received as bright.

CSP systems use mirrors to maximize reflection and focus the reflected sunlight and associated heat on a design point to produce steam, which generates electricity. About 90 percent of sunlight is reflected. However, because the reflected sunlight is controlled and focused on the heat collecting element (HCE) of the system, it generally does not reflect back to other sensitive receptors. Another source of reflection in a CSP system is the light that contacts the back of the HCE and never reaches the mirror. Parts of the metal frame can also reflect sunlight. In central receiver (or power tower) applications, the receiver can receive concentrated sunlight that is up to a thousand times the sun’s normal irradiance. Reflections from a central receiver, although approximately 90% absorptive, can still reflect a great deal of sunlight.

Solar PV and SHW panels are constructed of dark, light-absorbing materials and covered with an anti-reflective coating designed to maximize absorption and minimize reflection. However, the glass surfaces of solar PV and SHW systems also reflect sunlight to varying degrees throughout the day and year. The amount of reflected sunlight is based on the incidence angle of the sun relative to the light-sensitive receptor (e.g., a pilot or air traffic tower controller). The

²⁴ Shown as Figure 3 on the following page in this report.

amount of reflection increases with lower incidence angles. In some situations, 100% of the sun's energy can be reflected from solar PV and SHW panels.

Because solar energy systems introduce new visual surfaces to an airport setting where reflectivity could result in glare that can cause flash blindness to those that require clear, unobstructed vision, project proponents should evaluate reflectivity during project siting and design.

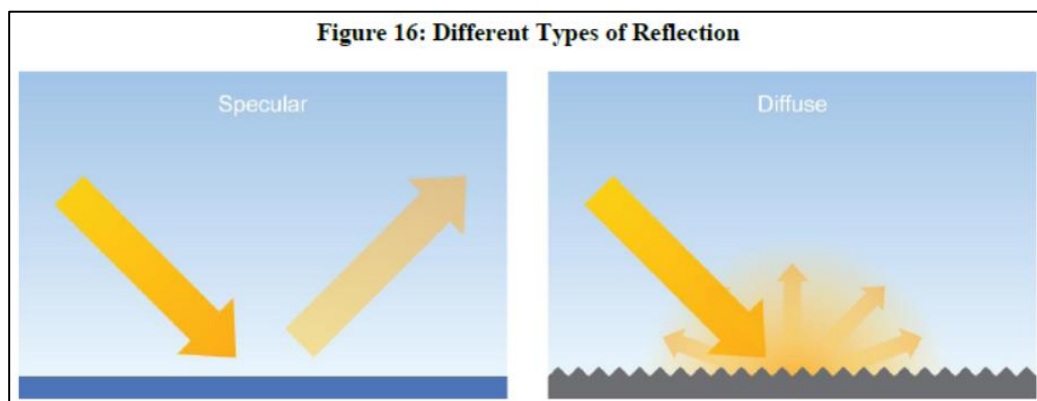


Figure 3 Specular versus diffuse reflections

Completing an Individual Glare Analysis

Evaluating glare for a specific project should be an iterative process that looks at one or more of the methodologies described below. Airport sponsors should coordinate closely with the FAA's Office of Airports to evaluate the potential for glint and glare for solar projects on airport property. These data should include a review of existing airport conditions and a comparison with existing sources of glare, as well as related information obtained from other airports with experience operating solar projects.

Because the FAA has no specific standards for airport solar facilities and potential glare, the type of glare analysis may vary. Depending on site specifics (e.g., existing land uses, location and size of the project) an acceptable evaluation could involve one or more of the following levels of assessment:

- (1) A qualitative analysis of potential impact in consultation with the Air Traffic Control Tower, pilots, and airport officials
- (2) A demonstration field test with solar panels at the proposed site in coordination with Air Traffic Control Tower personnel
- (3) A geometric analysis to determine days and times when there may be an ocular impact.

The FAA should be consulted after completing each of the following steps to determine if potential reflectivity issues have been adequately considered and addressed.

The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and system design.

1. Assessing Baseline Reflectivity Conditions

Reflection in the form of glare is present in current aviation operations. The existing sources of glare come from glass windows, auto surface parking, rooftops, and water bodies. At airports, existing reflecting surfaces may include hangar roofs, surface parking, and glassy office buildings. To minimize unexpected glare, windows of air traffic control towers and airplane cockpits are coated with anti-reflective glazing. Operators also wear polarized eye wear. Potential glare from solar panels should be viewed in this context. Any airport considering a solar PV project should first review existing sources of glare at the airport and the effectiveness of measures used to mitigate that glare.

2. Tests in the Field

Potential glare from solar panels can easily be viewed at the airport through a field test. A few airports have coordinated these tests with FAA Air Traffic Controllers to assess the significance of glare impacts. To conduct such a test, a sponsor can take a solar panel out to proposed location of the solar project, and tilt the panel in different directions to evaluate the potential for glare onto the air traffic control tower. For the two known cases where a field test was conducted, tower personnel determined the glare was not significant. If there is a significant glare impact, the project can be modified by ensuring panels are not directed in that direction.

3. Geometric Analysis

Geometric studies are the most technical approach for reflectivity issues. They are conducted when glare is difficult to assess through other methods. Studies of glare can employ geometry and the known path of the sun to predict when sunlight will reflect off of a fixed surface (like a solar panel) and contact a fixed receptor (e.g., control tower). At any given site, the sun moves across the sky every day and its path in the sky changes throughout year. This in turn alters the destination of the resultant reflections since the angle of reflection for the solar panels will be the same as the angle at which the sun hits the panels. The larger the reflective surface, the greater the likelihood of glare impacts. Figure 17 provides an example of such a geometric analysis (not shown).

Facilities placed in remote locations, like the desert, will be far from receptors and therefore potential impacts are limited to passing aircraft. Because the intensity of the light reflected from the solar panel decreases with increasing distance, an appropriate question is how far you need to be from a solar reflected surface to avoid flash blindness. It is known that this distance is directly proportional to the size of the array in question but still requires further research to definitively answer.

The FAA Airport Facilities Terminal Integration Laboratory (AFTIL), located at the William J. Hughes Technical Center at Atlantic City International Airport, provides system capabilities to evaluate control tower interior design and layout, site selection and orientation, height determination studies, and the transition of equipment into the airport traffic control tower environment. AFTIL regularly conducts computer assessments of potential penetrations of airspace for proposed airport design projects and has modeled the potential characteristics of

glare sources, though not for solar projects. AFTIL may be a resource for regional FAA officials and sponsors who seek to evaluate the potential effects of glare from proposed solar projects.

Experiences of Existing Airport Solar Projects

Solar installations are presently operating at a number of airports, including megawatt-sized solar facilities covering multiple acres. Air traffic control towers have expressed concern about glint and glare from a small number of solar installations. These were often instances when solar installations were sited between the tower and airfield, or for installations with inadequate or no reflectivity analysis. Adequate reflectivity analysis and alternative siting addressed initial issues at those installations

3.23 Key excerpts²⁵ from the final FAA guidance produced in 2021 are presented in the following section.

Initially, FAA believed that solar energy systems could introduce a novel glint and glare effect to pilots on final approach. FAA has subsequently concluded that in most cases, the glint and glare from solar energy systems to pilots on final approach is similar to glint and glare pilots routinely experience from water bodies, glass-façade buildings, parking lots, and similar features. However, FAA has continued to receive reports of potential glint and glare from on-airport solar energy systems on personnel working in ATCT cabs. Therefore, FAA has determined the scope of agency policy should be focused on the impact of on-airport solar energy systems to federally-obligated towered airports, specifically the airport's ATCT cab.

The policy in this document updates and replaces the previous policy by encouraging airport sponsors to conduct an ocular analysis of potential impacts to ATCT cabs prior to submittal of a Notice of Proposed Construction or Alteration Form 7460-1 (hereinafter Form 7460-1). Airport sponsors are no longer required to submit the results of an ocular analysis to FAA. Instead, to demonstrate compliance with 14 CFR 77.5(c), FAA will rely on the submittal of Form 7460-1 in which the sponsor confirms that it has analyzed the potential for glint and glare and determined there is no potential for ocular impact to the airport's ATCT cab. This process will enable FAA to evaluate the solar energy system project, with assurance that the system will not impact the ATCT cab.

FAA encourages airport sponsors of federally-obligated towered airports to conduct a sufficient analysis to support their assertion that a proposed solar energy system will not result in ocular impacts. There are several tools available on the open market to airport sponsors that can analyze potential glint and glare to an ATCT cab. For proposed systems that will clearly not impact ATCT cabs (e.g., on-airport solar energy systems that are blocked from the ATCT cab's view by another structure), the use of such tools may not be necessary to support the assertion that a proposed solar energy system will not result in ocular impacts.

²⁵ Edited to include only key information with respect to assessing glint and glare from solar PV developments.

The excerpt above states where a solar PV development is to be located on a federally obligated aerodrome with an ATC Tower, it will require a glint and glare assessment to accompany its application. It states that pilots on approach are no longer a specific assessment requirement due to effects from solar energy systems being similar to glint and glare pilots routinely experience from water bodies, glass-façade buildings, parking lots, and similar features. Ultimately it comes down to the specific aerodrome to ensure it is adequately safeguarded, and it is on this basis that glint and glare assessments are routinely still requested.

The policy also states that several different tools and methodologies can be used to assess the impacts of glint and glare, which was previously required to be undertaken by the Solar Glare Hazard Analysis Tool (SGHAT) using the Sandia National Laboratories methodology.

In 2018, the FAA released the latest version (Version 1.1) of the 'Technical Guidance for Evaluating Selected Solar Technologies on Airports'. Whilst the 2021 final policy also supersedes this guidance, many of the points are still relevant because aerodromes are still safeguarding against glint and glare irrespective of the FAA guidance. The key points are presented below for reference:

- Reflectivity refers to light that is reflected off surfaces. The potential effects of reflectivity are glint (a momentary flash of bright light) and glare (a continuous source of bright light). These two effects are referred to hereinafter as "glare," which can cause a brief loss of vision, also known as flash blindness²⁶.
- The amount of light reflected off a solar panel surface depends on the amount of sunlight hitting the surface, its surface reflectivity, geographic location, time of year, cloud cover, and solar panel orientation.
- As illustrated on Figure 16²⁷, flat, smooth surfaces reflect a more concentrated amount of sunlight back to the receiver, which is referred to as specular reflection. The more a surface is polished, the more it shines. Rough or uneven surfaces reflect light in a diffused or scattered manner and, therefore, the light will not be received as bright.
- Because the FAA has no specific standards for airport solar facilities and potential glare, the type of glare analysis may vary. Depending on site specifics (e.g., existing land uses, location and size of the project) an acceptable evaluation could involve one or more of the following levels of assessment:
 - A qualitative analysis of potential impact in consultation with the Control Tower, pilots and airport officials;

²⁶ Flash Blindness, as described in the FAA guidelines, can be described as a temporary visual interference effect that persists after the source of illumination has ceased. This occurs from many reflective materials in the ambient environment.

²⁷ Figure 3 above.

- A demonstration field test with solar panels at the proposed site in coordination with FAA Tower personnel;
- A geometric analysis to determine days and times when an impact is predicted.
- The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and system design.
- **1. Assessing Baseline Reflectivity Conditions** – Reflection in the form of glare is present in current aviation operations. The existing sources of glare come from glass windows, auto surface parking, rooftops, and water bodies. At airports, existing reflecting surfaces may include hangar roofs, surface parking, and glassy office buildings. To minimize unexpected glare, windows of air traffic control towers and airplane cockpits are coated with anti-reflective glazing. Operators also wear polarized eye wear. Potential glare from solar panels should be viewed in this context. Any airport considering a solar PV project should first review existing sources of glare at the airport and the effectiveness of measures used to mitigate that glare.
- **2. Tests in the Field** – Potential glare from solar panels can easily be viewed at the airport through a field test. A few airports have coordinated these tests with FAA Air Traffic Controllers to assess the significance of glare impacts. To conduct such a test, a sponsor can take a solar panel out to proposed location of the solar project, and tilt the panel in different directions to evaluate the potential for glare onto the air traffic control tower. For the two known cases where a field test was conducted, tower personnel determined the glare was not significant. If there is a significant glare impact, the project can be modified by ensuring panels are not directed in that direction.
- **3. Geometric Analysis** – Geometric studies are the most technical approach for reflectivity issues. They are conducted when glare is difficult to assess through other methods. Studies of glare can employ geometry and the known path of the sun to predict when sunlight will reflect off of a fixed surface (like a solar panel) and contact a fixed receptor (e.g., control tower). At any given site, the sun moves across the sky every day and its path in the sky changes throughout year. This in turn alters the destination of the resultant reflections since the angle of reflection for the solar panels will be the same as the angle at which the sun hits the panels. The larger the reflective surface, the greater the likelihood of glare impacts.
- Facilities placed in remote locations, like the desert, will be far from receptors and therefore potential impacts are limited to passing aircraft. Because the intensity of the light reflected from the solar panel decreases with increasing distance, an appropriate question is how far you need to be from a solar reflected surface to avoid flash blindness.

It is known that this distance is directly proportional to the size of the array in question²⁸ but still requires further research to definitively answer.

- **Experiences of Existing Airport Solar Projects** – Solar installations are presently operating at a number of airports, including megawatt-sized solar facilities covering multiple acres. Air traffic control towers have expressed concern about glint and glare from a small number of solar installations. These were often instances when solar installations were sited between the tower and airfield, or for installations with inadequate or no reflectivity analysis. Adequate reflectivity analysis and alternative siting addressed initial issues at those installations.

3.24 The previous 2018 guidance offered three assessment options however, where a proposed solar development is located where a risk to aviation safety is possible, geometric analysis, as per the 2013 guidance, was likely to be required to alleviate concerns. The 2021 final policy has taken a step back and allowed aerodromes to safeguard as they see fit, with no longer a recommendation for any given glare model. The current precedence set by aerodromes in the UK and internationally is to safeguard against glint and glare as per the 2018 guidance based on the aerodrome's operations.

²⁸ Ho, Clifford, Cheryl Ghanbari, and Richard Diver. 2009. Hazard Analysis of Glint and Glare From Concentrating Solar Power Plants. SolarPACES 2009, Berlin Germany. Sandia National Laboratories.

The Air Navigation Order

3.25 The Air Navigation Order (ANO) from 2016²⁹ contains general aviation legislation with respect to aviation safety. Key points relating to general safety and light as a hazard are presented below. Note only the relevant information is presented.

The Air Navigation Order 2009

Lights liable to endanger

224. (1) A person must not exhibit in the United Kingdom any light which—

(a) by reason of its glare is liable to endanger aircraft taking off from or landing at an aerodrome; or

(b) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft.

(2) If any light which appears to the CAA to be a light described in paragraph (1) is exhibited, the CAA may direct the person who is the occupier of the place where the light is exhibited or who has charge of the light, to take such steps within a reasonable time as are specified in the direction—

(a) to extinguish or screen the light; and

(b) to prevent in the future the exhibition of any other light which may similarly endanger aircraft.

(3) The direction may be served either personally or by post, or by affixing it in some conspicuous place near to the light to which it relates.

(4) In the case of a light which is or may be visible from any waters within the area of a general lighthouse authority, the power of the CAA under this article must not be exercised except with the consent of that authority.

Lights which dazzle or distract

225. A person must not in the United Kingdom direct or shine any light at any aircraft in flight so as to dazzle or distract the pilot of the aircraft.'

The document states that no 'light', 'dazzle' or 'glare' should be produced which will create a detrimental impact upon aircraft safety.

Endangering safety of an aircraft

240. A person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft.

²⁹ The Air Navigation Order, 2016. No. 3015. Last accessed 15.08.2022.

Endangering safety of any person or property

241. A person must not recklessly or negligently cause or permit an aircraft to endanger any person or property.

3.26 The document states that no 'light', 'dazzle' or 'glare' should be produced which would produce a detrimental impact to aircraft safety. This guidance is referenced within the CAA guidance.

4 MODELLING PARAMETER REQUIREMENTS

Overview

4.1 A glint and glare assessment requires a geometric model to accurately predict whether a solar reflection is geometrically possible towards a receptor. The following sections set out the modelling requirements.

Geometric Modelling Requirements

4.2 The requirements for a geometric model are presented below. Failure to include the parameters below is likely to result an over-simplified output that would not be considered reliable in the context of predicted impact. The calculations are three dimensional and complex, and must account for the following:

- The Earth's orbit around the Sun;
- The Earth's rotation;
- The Earth's orientation;
- The location of the solar PV development or building development including the reflector (solar panel or façade) area;
- The reflector's 3D orientation including azimuth angle of the solar panel or façade (the orientation of the reflectors relative to north and the reflector elevation angle);
- Local topography including receptor and reflector (panel or façade) heights above mean sea level.

4.3 For increased accuracy, the model could account for the following:

- Terrain at the visible horizon;
- Local time zone and daylight savings times;
- Consideration of sunrise and sunset times;
- Determine which solar panels create the solar reflection within the solar PV development;
- Determine what area of the façade create the solar reflection from the building development;
- Azimuth range of the Sun³⁰ when a solar reflection is geometrically possible;
- Vertical elevation range of the Sun when a solar reflection is geometrically possible;

³⁰ The azimuth range is the angle between the Sun and North, measured clockwise around the receptor's horizon. The Sun azimuth range shows the location of the Sun when a geometric solar reflection is possible. Therefore, it is possible to determine whether the Sun and the solar reflection are both likely to be visible to a receptor.

- High-resolution analysis i.e. undertaking multiple geometric calculations within the given solar PV development or façade area. For example, at intervals of between 1 and 20 metres;
- Consideration of the effect of non-specular reflective surfaces e.g. masonry between glass façades;
- The intensity³¹ of any solar reflection produced.

Geometric Modelling Overview

4.4 Solar reflections from a solar panel or a façade made of glass are specular meaning that a high percentage of incoming light is reflected in a particular direction. The direction of a specular solar reflection from a flat reflector is calculated by considering the normal. The normal is an imaginary line perpendicular to the reflective surface and originates from the point the incoming light intercepts the face of the reflector. Figure 4 and Figure 5 below and on the following page may be used to aid understanding of the reflection calculation process.

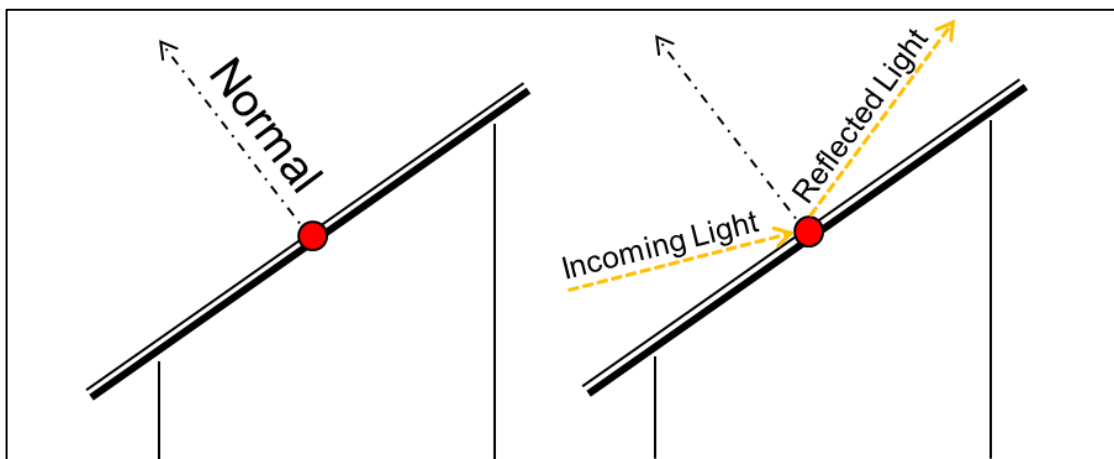


Figure 4 Illustration showing normal and solar reflection from a solar panel (side on).

³¹ In W/cm² at the retina, for example.

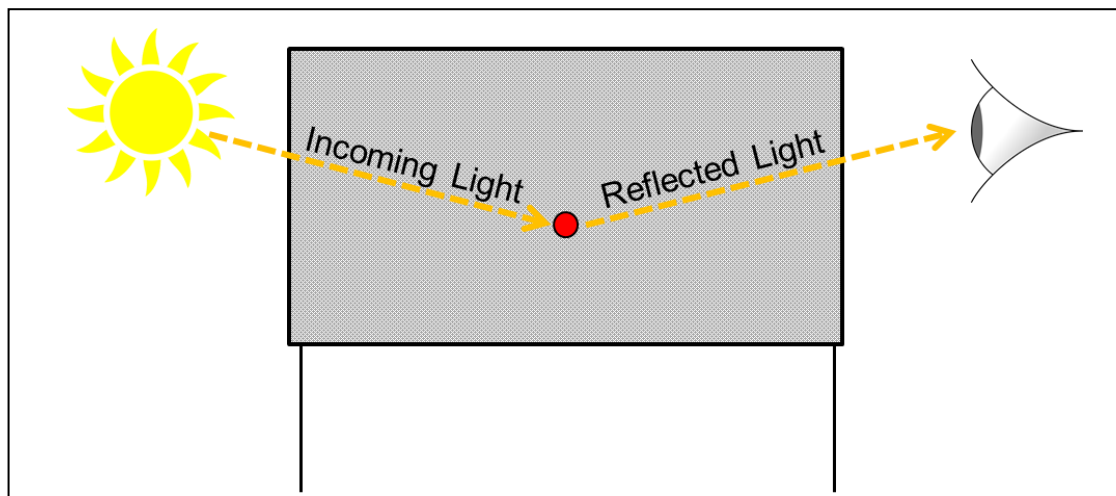


Figure 5 Illustration showing solar reflection from a solar panel (top down).

4.5 The direction of a solar reflection is also dependent on the elevation angle and the azimuth angle of a solar panel. The solar panel elevation angle and azimuth angle are illustrated in Figure 6 below.

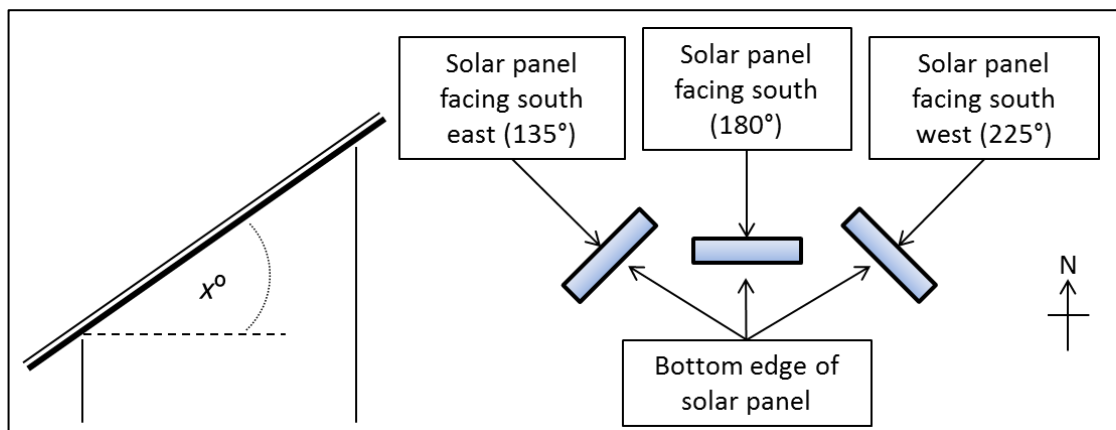


Figure 6 Illustration showing panel elevation angle (side-on) and panel azimuth angle (top down)

4.6 The left image in Figure 6 shows the panel elevation angle. A typical panel elevation angle value for x in the UK and Ireland is 15° - 35° . The right image shows the panel azimuth angle viewed from a top down perspective. A typical panel azimuth angle in the UK and Ireland is 180° (facing south towards the equator – with north facing panels typical in the southern hemisphere). Building façades are typically at 90 degrees to the horizontal, however some buildings, such as the Shard in London (UK), do not have façades that are perpendicular to the ground.

Geometric Modelling Methodology Overview

4.7 A geometric solar reflection model needs to consider a number of factors when determining whether a solar reflection is geometrically possible towards a surrounding receptors, and if so, the duration throughout the year. The following information is required for a complete geometric solar reflection model:

- A model of the Sun's path throughout the sky for an entire selected year;
- For calculating a solar reflection:
 - The 3D angle between the source and the normal;
 - The azimuth and elevation of the solar reflection, by verifying the following:
 - That the angle between source (the Sun) and normal (relative to the reflector, considering its elevation and azimuth angle) is equal to the angle between the normal and solar reflection;
 - That the source, normal and solar reflection are in the same plane;
 - A model of the path of the Sun relative to the reflector area based on the reflector's latitude and longitude;
 - The assessed receptor location's latitude and longitude relative to the above.

- The model must then be run to determine whether the Sun is ever in a position within the sky to create a solar reflection from the reflectors towards the assessed receptor. This must consider the relative heights of the reflectors and receptors. Where a solar reflection is geometrically possible, a date time graph is a suitable representational format.

4.8 The process outlined above does not describe the full methodology for undertaking a detailed geometric glint and glare assessment however, it presents the key criteria that must be considered within a model.

Modelling Parameter Requirement Conclusions

4.9 Various modelling methodologies can be used to model solar reflections from the Sun. The process outlined provides general guidance for the parameters that should be built into a geometric solar reflection model.

5 GLINT AND GLARE IMPACT SIGNIFICANCE

Overview

5.1 The significance of glint and glare will vary for different receptors. This section presents a general overview of the significance criteria with respect to experiencing a solar reflection.

Impact Significance Definition

5.2 For each glint and glare assessment, an overall conclusion should be made with reference to the requirement for mitigation for each assessed receptor. Table 2 below presents the recommended definition of 'impact significance' in glint and glare terms and the requirement for mitigation under each.

Impact Significance	Definition	Mitigation Requirement
No Impact	A solar reflection is not geometrically possible or will not be visible from the assessed receptor.	No mitigation required.
Low	A solar reflection is geometrically possible however any impact is considered to be small such that mitigation is not required e.g. intervening screening will limit the view of the reflecting solar panels significantly.	No mitigation recommended.
Moderate	A solar reflection is geometrically possible and visible however it occurs under conditions that do not represent a worst-case given individual receptor criteria.	Mitigation recommended.
High	A solar reflection is geometrically possible and visible under worst-case conditions that will produce a significant impact given individual receptor criteria	Mitigation will be required if the proposed development is to proceed.

Table 2 *Impact significance definition*

5.3 Figure 7 on the following page highlights the general conditions under which a solar reflection may be possible. These are key considerations when determining whether a solar reflection is to be considered significant and whether mitigation should be implemented.

General Overview – Determining Significant Glint and Glare Effects

5.4 The following six conditions should be considered when determining whether a predicted solar reflection will produce an impact (low to high) for the assessed receptors. These conditions are illustrated in Figure 7 to the right. Each one is explained further below.

1. The reflector can be seen by the receptor i.e. there is line of sight between the observer (receptor) and the reflector;
2. The location of the receptor relative to the solar reflection. The significance of a solar reflection may be dependent on its location of origin relative to the location of the receptor;
3. The time of day when the Sun is in the position to produce a solar reflection from a reflector towards an assessed receptor³². Some times of day may be more significant than others for some receptors;
4. The path between the Sun and reflector is clear of obstruction i.e. there is a line of sight between the Sun and the reflector when the Sun is at a location in the sky where it can produce a solar reflection;
5. The solar reflection is not coming from the same direction as the Sun. A solar reflection is less significant when a receptor is already facing directly at the Sun;
6. A momentary exposure is less significant than a prolonged one. Therefore, the duration of the solar reflection should be considered for static receptors i.e. dwellings or ATC Towers.

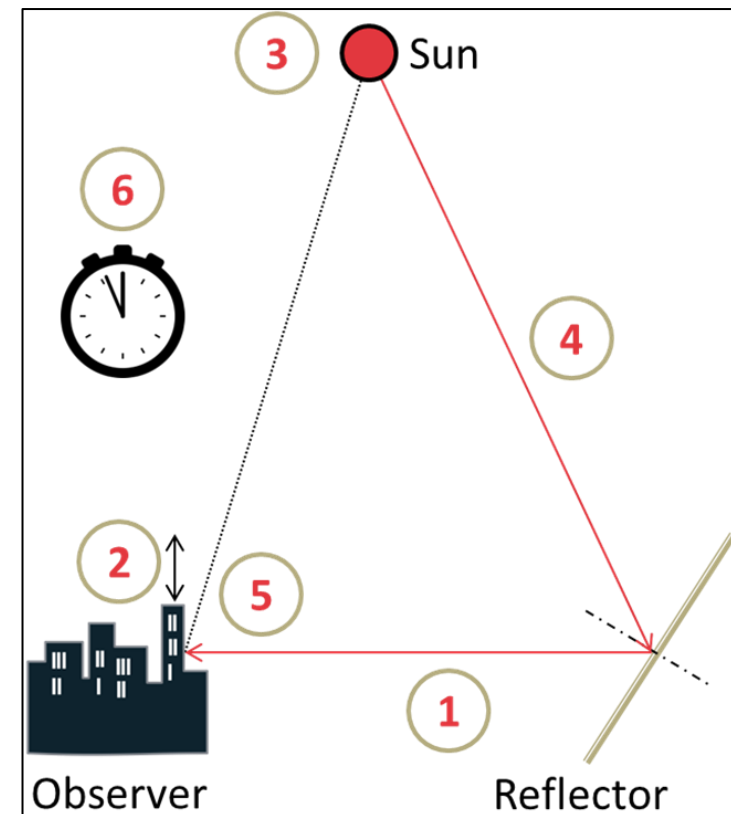


Figure 7 Conditions for determining significant glint and glare

³² Not specifically referenced within the significance criteria for each assessed receptor (dwellings, road, rail and aviation) however in some instance the time of day may warrant consideration.

5.5 Figure 8 below shows the general process for determining the significance of glint and glare.

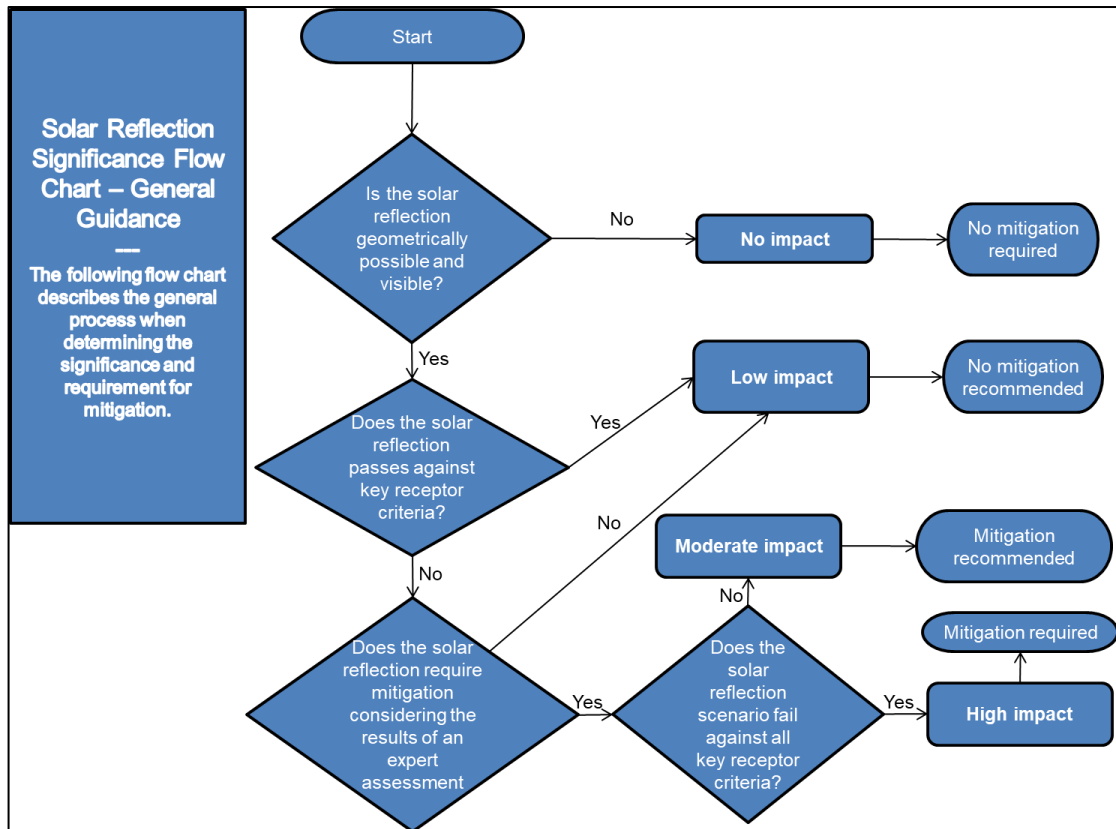


Figure 8 General process for determining the significance of glint and glare

5.6 Key receptor criteria refer to how aspects of the glare scenario may affect receptors differently e.g. field of view for a road user not being relevant to a resident in a local dwelling, or how the intensity of reflection being relevant for aviation only.

5.7 The specific methodologies for each receptor (dwellings, road, railway and aviation) are presented in Sections 6-9.

6 ASSESSING THE IMPACT UPON SURROUNDING DWELLINGS

Overview

6.1 Local residents are a key stakeholder within the local environment when proposing a solar PV development. This is because residents will be living in close proximity to the solar PV development whilst also potentially having views of the solar panels for its lifetime. Where a view of the solar panel exists, a solar reflection may be possible which may impact upon residential amenity. The following guidance has therefore been produced to determine in what instances, a solar reflection becomes significant and mitigation should be implemented. The effects of glint and glare from building developments is not typically considered however, if required, the general methodology can be applied.

Key Considerations

6.2 A list of key considerations for assessing glint and glare with respect to surrounding dwellings and residential amenity is presented below:

- Surrounding dwellings may have views of a solar PV development. Where a view of the solar panel exists, a solar reflection may be possible;
- A view of a solar panel however does not guarantee that a solar reflection is possible;
- There is no technical limit (distance) within which solar reflections is possible for a surrounding dwelling receptor however, the significance of a reflection decreases with distance. This is because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases;
- Seasonal variations or additional developments may change the view from a dwelling towards the solar panels over time;
- Terrain and shielding by vegetation are also more likely to obstruct an observer's view at longer distances;
- In general, the geometry of the relationship between typical ground mounted solar panels and the movement of the Sun in the northern hemisphere means that dwellings due east and west of the panels are most likely to view a solar reflection for south facing arrays panels. Dwellings that are north or south of the panels are unlikely to experience a solar reflection under typical conditions. In the southern hemisphere, this is reversed;
- For solar PV developments that have solar panels orientated at an azimuth angle other than south, solar reflections may be directed in alternate directions.

6.3 The following subsections present the recommended methodology for assessing the impact upon residential amenity.

Identifying Receptors

6.4 The following process should be used for identifying dwelling receptors:

1. Identify dwellings in the immediate surrounding area (out to approximately 1km from the solar PV development boundary) that may have visual line of sight to the solar panels. Figure 9 below shows the receptor identification process;
2. If visual line of sight exists between the proposed solar PV development and a dwelling, then a solar reflection could be experienced if it is geometrically possible. If there is no line of sight, then a reflection cannot be experienced;
3. An additional height should be added to the ground level at a dwelling to represent a viewing height;
4. For dwellings, a recommended additional height of 1.8 metres above ground level should be added to account for eye level on the ground floor, with additional floors being assessed as required. Additional heights should be considered where a receptor is higher than a first floor. Modelling is recommended for ground floor receptors because it is typically the most occupied during daylight hours;
5. Use the height and location data within the geometric solar reflection model.

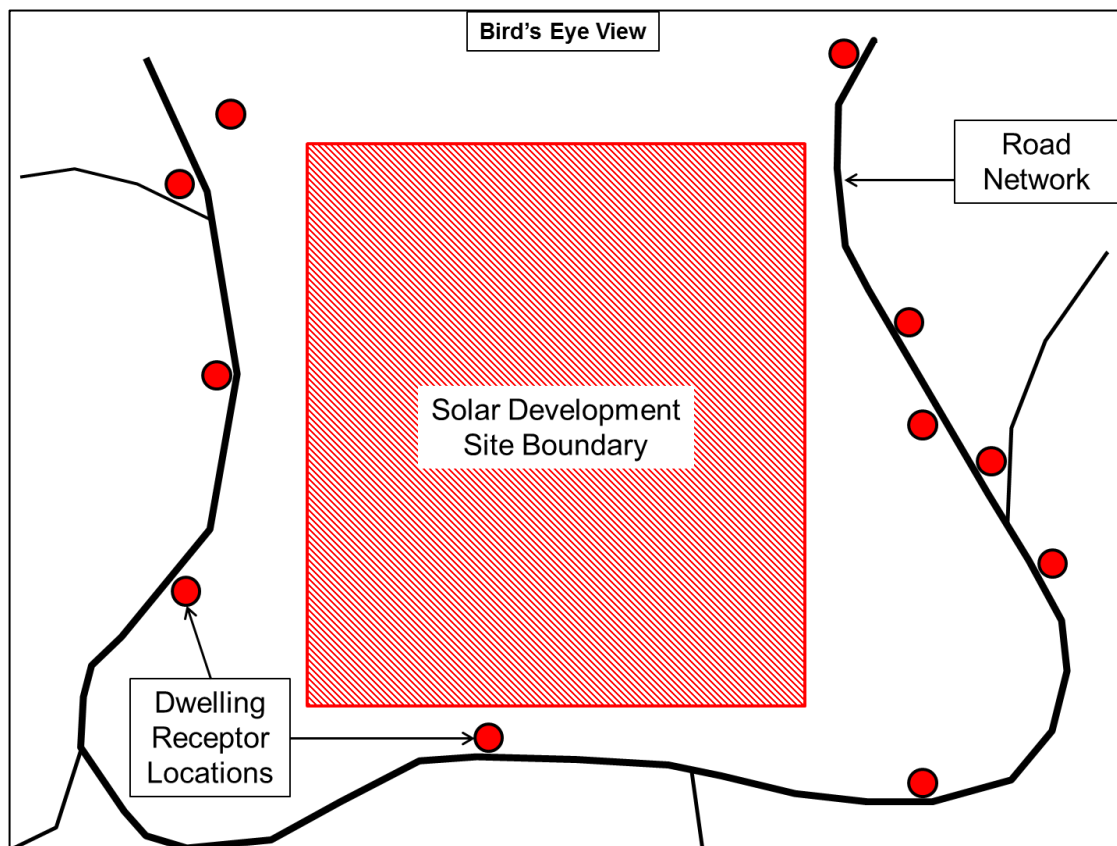


Figure 9 Illustration showing receptor identification process – dwellings

Assessment Process

6.5 The following process should be used for modelling glint and glare for the identified dwelling receptors:

1. Define the solar PV development panel area;
2. Undertake geometric calculations, as outlined within Section 4 of this guidance;
3. Produce a solar reflection chart to determine whether a solar reflection is geometrically possible, and if so at what time/duration;
4. Assess the results of the geometric glint and glare assessment in the context of the following:
 - a. Sun location relative to the solar panels;
 - b. Location of the reflecting solar panels relative to the dwelling;
 - c. Existing screening;
 - d. Proposed screening;
5. Determine whether a solar reflection is significant;
6. Consider mitigation, if required.

Discussion of Significant Effects

6.6 There are many solar PV developments where solar reflections are geometrically possible and visible from surrounding dwellings. Experiencing a solar reflection does not, however, guarantee a significant effect requiring mitigation will occur. Assuming the solar PV development is visible from a window of a room occupied during daylight hours, the duration of time for which a solar reflection could last is the most significant characteristic.

6.7 Other factors that could be considered when determining whether a solar reflection is significant include:

- Whether the solar reflection is incident to direct sunlight and the location;
- Whether the dwelling has a window facing the solar PV development;
- The room or floor within the dwelling from which a solar reflection may be visible i.e. is it occupied for a long period during daylight hours e.g. a living room;
- Whether views from a window are oblique;
- The time of day/year when a solar reflection is geometrically possible.

6.8 The duration of time for which a solar reflection is possible is the main defining characteristic when determining whether mitigation is required. Defining a minimum duration for effects to become significant is, however, subjective. For static receptors, the length of time for which a solar reflection is geometrically possible and visible will determine its significance upon residential amenity. Therefore, it is appropriate to choose a duration beyond which solar reflections become significant and where mitigation is required. Applying a strictly scientific approach is difficult however because:

- Most models generally show a worst-case scenario of glint and glare, often predicting solar reflections for a much greater length of time than will be experienced in reality;
- The scenario in which glint and glare occurs will vary for each dwelling;
- The effects of glint and glare are subjective and the significance will vary from person to person.

6.9 To quantify and determine where a significant impact is expected, previous glint and glare assessment experience has been drawn upon as well as a review of existing guidance with respect to light based environmental impacts, these include:

- Previous glint and glare assessment experience;
- Shadow flicker guidance for wind turbines³³. Guidance has been produced which sets durations beyond which a significant impact on residential amenity is expected and mitigation is required.

Previous Experience of Glint and Glare Dwelling Assessments

6.10 It is common for dwellings to be located within 1km of a proposed solar PV development. Assessment experience means that typical results for proposed ground mounted solar PV developments³⁴ are known. It is common for solar reflections to be possible in the mid-morning (~06:00-08:00 GMT) and again in the early evening (~17:00-19:00 GMT). There are many examples of dwellings located where a solar reflection is geometrically possible however, a solar reflection could only ever be significant where the solar reflection is visible from the dwelling. Assuming a solar reflection is geometrically possible, and the reflecting solar panels are visible, a solar reflection would be experienced when the following conditions are met:

1. An observer is located at a point within the dwelling where a solar reflection is possible e.g. located at a kitchen window at the time of the day when a solar reflection is geometrically possible;
2. The weather at the particular time of the day when a solar reflection is geometrically possible is clear and sunny;
3. There are clear unobstructed views from this window towards the reflecting solar panel area

6.11 The likelihood of these conditions being met varies both person to person and geographically based on local climate conditions. However, it illustrates that a predicted geometric solar reflection does not guarantee a visible solar reflection when considering real world conditions.

³³ Shadow flicker, like glint and glare, is considered a detrimental effect created through the manipulation of sunlight. Therefore the guidance has been used for comparative purposes.

³⁴ At typical solar panel azimuth and inclinations. Defined as panel elevation angle 15-30 degrees and south facing in the UK and Ireland.

Shadow Flicker Guidance

6.12 “Shadow flicker” refers to the sunlight flickering effect caused when rotating wind turbine blades periodically cast shadows over neighbouring dwellings through small openings such as windows. This can cause a significant detrimental impact upon residential amenity under certain conditions.

6.13 A review of the shadow flicker guidance has been undertaken, with specific reference to the guidance where time limits have been stated for the maximum acceptable duration of shadow flicker, beyond which mitigation is required. The guidance states the following:

1. Shadow flicker is possible at dwellings within 10 rotor diameters³⁵. A typical rotor diameter for a large-scale wind turbine is 90m, making the potential shadow flicker zone out to 900m from the wind turbine location³⁶;
2. The following must all apply:
 - a. Shadow flicker is only possible when the wind turbine is rotating; and
 - b. Shadow flicker is only possible where the Sun passes behind the rotating wind turbine relative to the assessed dwelling; and
 - c. Shadow flicker is possible within rooms where windows have a clear view of the rotating wind turbine.
3. Shadow flicker is deemed significant where it lasts for longer than 30 minutes per day and for more than 30 hours of the year within 500m of the turbine³⁷ in some European countries. Beyond this distance no maximum acceptable time is stated;
4. Mitigation is required if all of the above are satisfied.

Determination of Significant Effects

6.14 The effects of glint and glare differ to shadow flicker for a number of reasons, and could be considered less significant because:

- A solar panel produces a solar reflection and therefore the light reflected is less intense than direct sunlight because a percentage of the light is absorbed by the solar panel. Shadow flicker is the effect of the varying light levels directly from the Sun;
- Shadow flicker produces significant variations to light levels within a room. An observer does not have to be looking at the wind turbine directly to observe the effect. For glint and glare effects to be experienced, an observer has to view the solar panels directly;

³⁵ Onshore Wind Energy Planning Conditions Guidance Note, Renewables Advisory Board and BERR (2007). Last accessed 02/11/2016.

³⁶ The search radius for dwellings is within 1km from a proposed solar development for glint and glare effects. This search area is for glint and glare effects is therefore expected to be larger than the area for shadow flicker for the majority of large-scale onshore wind turbines.

³⁷ Draft PPS18: Renewable Energy Annex 1 Wind Energy Planning Issues: Shadow Flicker and Reflected Light, Planning Portal Northern Ireland (the shadow flicker recommendations are based on research by Predac, a European Union sponsored organisation promoting best practice in energy use and supply which draws on experience from Belgium, Denmark, France, the Netherlands and Germany). Last accessed 02/11/2016.

- A solar reflection from a solar panel will appear static, whereas the effect of shadow flicker will inherently flicker in time with 1/3 the frequency of the rotating blades (assuming three blades);
- The presence of shadow flicker would be a new effect experienced at a dwelling. Solar panels produce solar reflections of similar intensity to those from still water or glass for example, both common reflective sources next to dwellings.

6.15 Shadow flicker guidance states that effects for more than 30 minutes per day, over 30 hours of the year, is significant and requires mitigation. Considering the information presented within Section 6.5 and the above, it is deemed appropriate to consider the effects of glint and glare less significant than shadow flicker. Therefore, the duration beyond which mitigation should be required for glint and glare is longer than for shadow flicker.

6.16 Therefore the recommendation within this guidance is:

- If visible glint and glare is predicted for a surrounding dwelling for longer than 60 minutes per day, for three or more months of the year, then the impact should be considered significant with respect to residential amenity. In this scenario, mitigation should be implemented.

6.17 The process outlined in the following flow chart (Figure 10 below) is recommended when determining whether a solar reflection should be deemed significant and mitigation implemented.

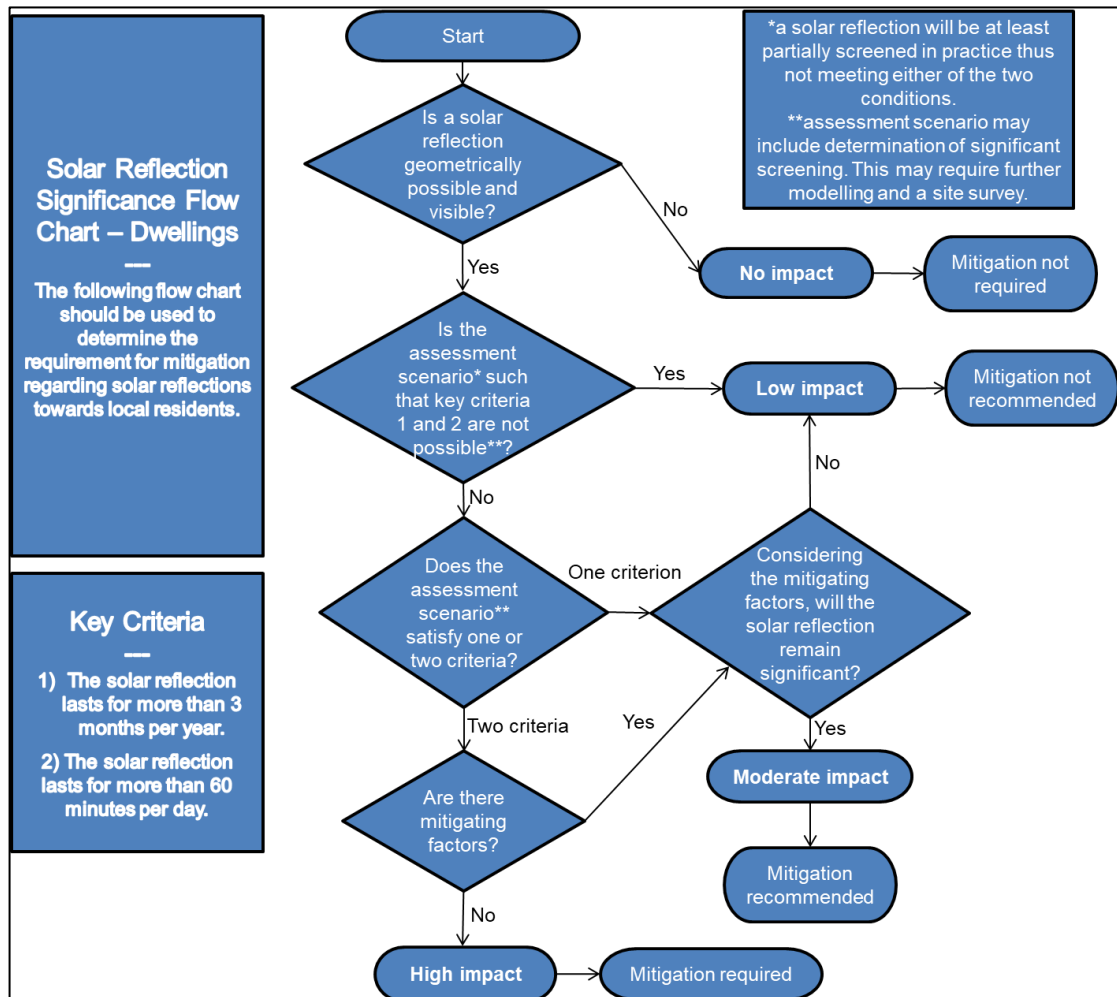


Figure 10 Dwelling impact significance flow chart

6.18 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

6.19 'Significant screening' with respect to visibility of reflecting solar panels implies that the observer's view is impeded to the extent that the presence of the solar panels cannot be easily discerned at first glance. For example, a hedgerow that contains small gaps that facilitate partial visibility of the panel face(s) would provide 'significant screening'. Figure 11 on the following page illustrates this.

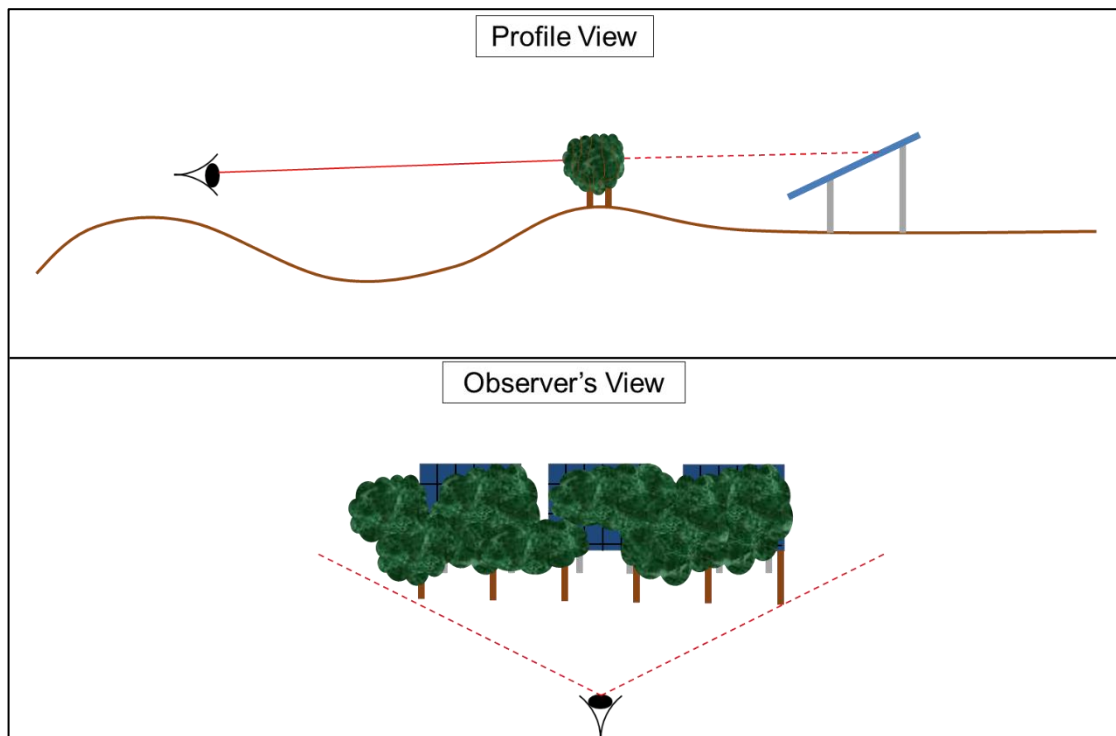


Figure 11 Illustration of 'significant screening'

Conclusions

6.20 The size of the solar panel area and visibility of the reflecting solar panels relative to the assessed dwelling will determine the duration of the solar reflection. Where solar reflections persist beyond 60 minutes per day for three or more months per year, solar reflections are considered significant and mitigation should be implemented. Consultation is recommended where there is a requirement for mitigation.

7 ASSESSING THE IMPACT UPON ROAD USERS

Overview

7.1 Locating a solar PV development next to a road is often essential due to access requirements. The possibility of glint and glare effects from the proposed solar PV development can however lead to concerns with respect to the possible impact upon road safety especially if the solar PV development is to be located next to a road with fast moving and/ or busy traffic. Therefore, a glint and glare assessment may be requested by the relevant stakeholders so that the possible effects can be understood. The effects of glint and glare from building developments is not typically considered however, if required, the general methodology can be applied.

Key Considerations

7.2 A list of key considerations for assessing glint and glare with respect to road safety is presented below:

- A road user may have views of a solar PV development. Where a view of the solar panel exists, a solar reflection may be possible;
- A view of a solar panel does not however guarantee that a solar reflection is possible;
- Where the solar reflection originates from relative to a road user is a key criterion. Pager Power considers a solar reflection to be potentially significant if it originates within 50 degrees of the direction of travel³⁸;
- There is no technical limit (distance) within which a solar reflection is possible for a surrounding road user however, the significance of a reflection decreases with distance. This is because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases;
- Seasonal variations to vegetation or new additional development may change the view from a road user towards the solar panels over time;
- Terrain and shielding by vegetation are also more likely to obstruct an observer's view over longer distances;
- In general, the geometry of the relationship between typical ground mounted solar panels and the movement of the Sun in the northern hemisphere means that roads due east and west of the panels are most likely to view a solar reflection for south facing arrays panels. Roads that are north or south of the panels are very unlikely to experience a solar reflection;
- For solar PV developments that have solar panels orientated at an azimuth angle other than south, solar reflections may be directed in alternate directions.

³⁸ As per Pager Power's white paper investigating the field of view for a road user. available [here](#).

7.3 The following subsections present the recommended methodology for assessing the impact upon road safety.

Identifying Receptors

7.4 The following process should be used for identifying road receptors:

1. Identify roads in the immediate surrounding area (out to approximately 1km from the solar PV development boundary) that may have visual line of sight to the solar panels;
2. If visual line of sight exists between the proposed solar PV development and the road, then a solar reflection could be experienced if it is geometrically possible;
3. If there is no line of sight, then a reflection cannot be experienced;
4. Assess a length of road, choosing individual receptor locations no more than 200 metres apart. This is shown in Figure 12 on the following page;
5. An additional height should be added to the ground level height to represent the typical viewing height from a road user. For road users, a height of 1.5 metres is recommended;
6. Use the height and location data within the geometric solar reflection model.

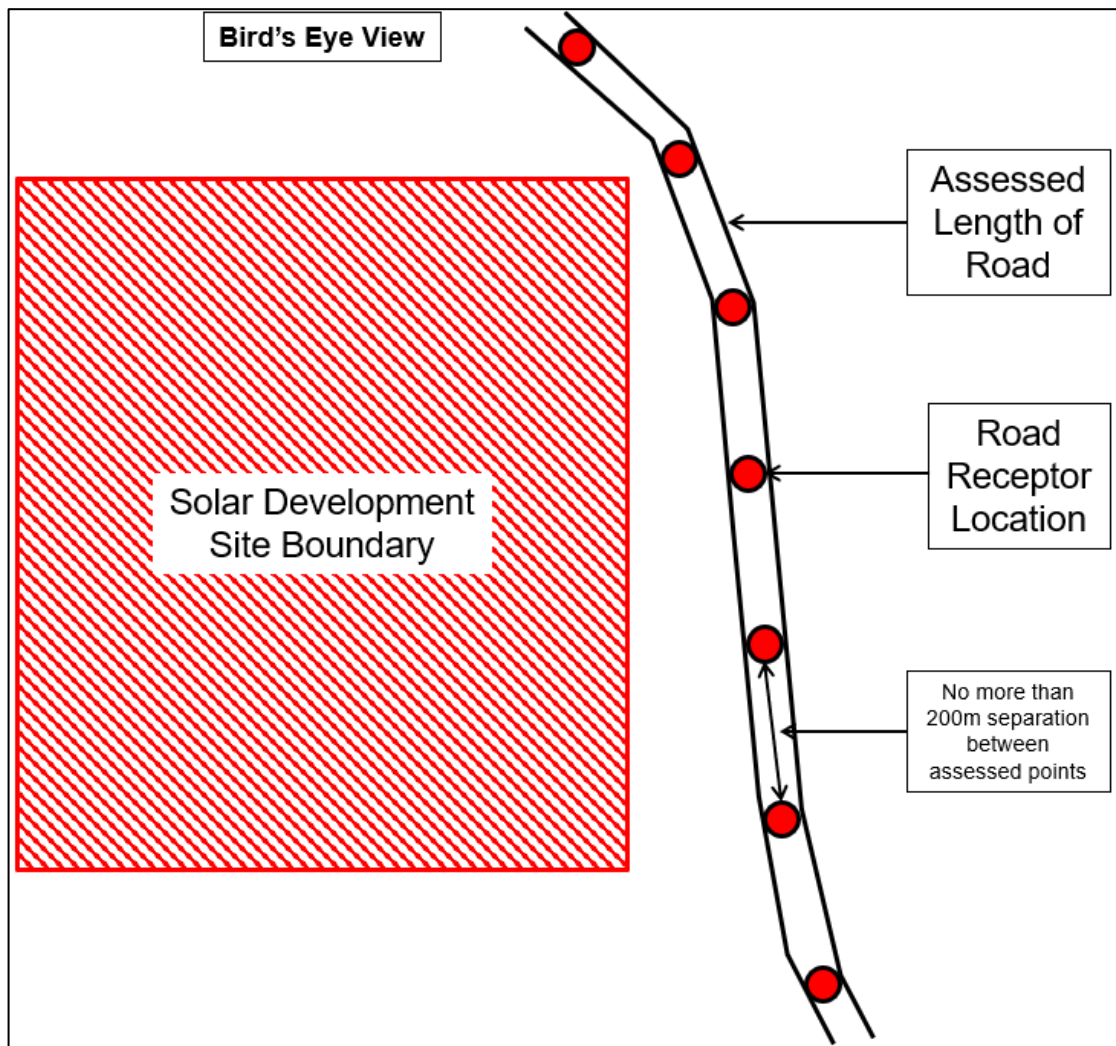


Figure 12 Illustration showing receptor identification process – roads

Assessment Process

7.5 The following process should be used for modelling glint and glare for the identified road user receptors:

1. Define the solar PV development solar panel area;
2. Undertake geometric calculations, as outlined within Section 4 of this guidance;
3. Produce a solar reflection chart to determine whether a solar reflection is geometrically possible;
4. Assess the results of the geometric glint and glare assessment in the context of the following:
 - a. Sun location relative to the solar panels;
 - b. Location of the reflecting solar panels relative to the road and direction of travel;
 - c. Consideration of existing screening;

- d. Consideration of proposed screening;
5. Determine whether a solar reflection is significant;
6. Consider mitigation, if required.

Determination of Significant Effects

7.6 A road user travelling on surrounding roads where a solar reflection is geometrically possible would experience a solar reflection that is fleeting in nature. This is because the road user is typically moving at speeds anywhere up to 70mph or 120kph. This means that the duration of a predicted solar reflection is mostly dependent on the speed of the road user travelling past the solar farm at the time when a solar reflection is geometrically possible. Therefore, the location of origin of the solar reflection is more significant than its duration because the receptor is moving.

7.7 There are many solar PV developments where solar reflections are geometrically possible towards roads. Experiencing a solar reflection does not guarantee a significant effect requiring mitigation and there are criteria that should be considered when determining the significance of a solar reflection, these are:

- Is the solar reflection incident to direct sunlight?
- What type of road is affected? Major National, National, Regional or Local roads?
- Does the solar reflection appear in-line with, or close to, the direction of travel (up to 50 degrees either side of the direction of travel)?
- What is the length of road that may experience a solar reflection?

7.8 For south facing solar panels at standard inclinations³⁹ it is likely that the Sun will be incident to the solar reflections in the UK and Ireland. Whether the solar reflection appears in-line with, or close to, the direction of travel depends on the geographic location of the surrounding road relative to the solar PV development. This, along with the size of the proposed solar PV development, determines the length of road that may be affected.

7.9 Because the length of time a solar reflection can last is mostly dependent on the road user's speed rather than the solar PV development, the length of time that a solar reflection is not considered when determining its significance. Instead, the location of origination of the solar reflection and road type are considered.

³⁹ Defined as 15-35 degrees in the UK and Ireland.

7.10 The process outlined in the flow chart below (Figure 13) is recommended when determining whether a solar reflection should be deemed significant, and mitigation implemented.

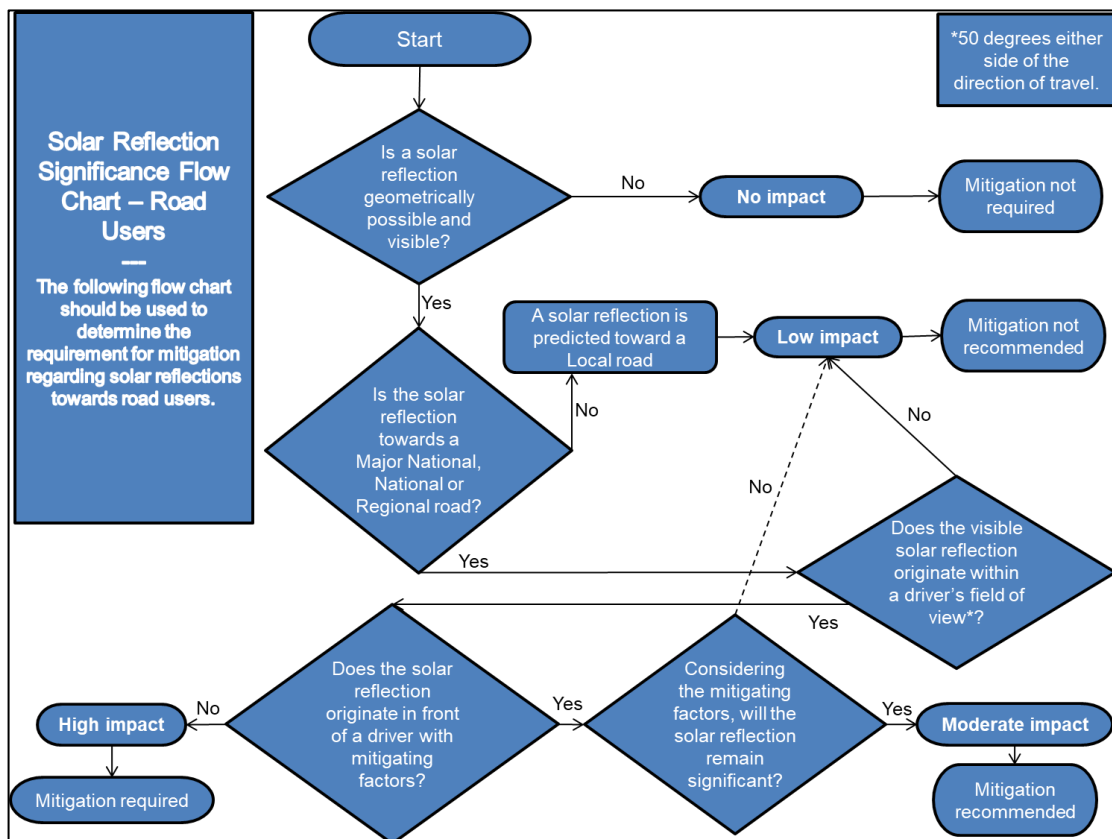


Figure 13 Road user impact significance flow chart

7.11 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

7.12 Regional, National and Major National roads are the most important in the majority of instances. Local roads may, under particular conditions, prove to be vital to the surrounding road network. Therefore, consultation with the local highway authority is recommended to ascertain the significance of a surrounding road where it is unknown.

7.13 The road classifications are based on typical UK roads, however what constitutes a regional road (for example) may vary in different countries. Therefore, alongside road classification, the road size, speed limit, surface, traffic volume and traffic speed should also be considered when applying impact significance with road classification.

Conclusions

7.14 The visibility and size of the reflecting solar panel area from an assessed road will in part, determine the duration of a solar reflection. In most scenarios, the speed of the vehicle will be the overall determining factor which determines the duration of the solar reflection. The type of road affected and location of origin of the solar reflection with respect to the direction of road travel will determine the requirement for mitigation. Consultation with the local highway authority is recommended where mitigation is required.

8 ASSESSING THE IMPACT UPON RAILWAY OPERATIONS

Overview

8.1 Solar PV and building developments can be located adjacent to railway lines. Indeed there are already a number of operational solar PV developments in these locations present in the UK^{40,41}. A consideration of a railway stakeholder may be the safety implications of glint and glare effects from a proposed solar PV or building development. It is therefore important to set a specific and standardised assessment methodology so that all proposals are assessed in the same way.

Key Considerations

8.2 A list of key considerations for assessing glint and glare with respect to rail safety is presented below:

- A train driver may have views of a solar PV or building development. Where a view of the solar panel or façade exists, a solar reflection may be possible;
- A view of the reflector does not however guarantee that a solar reflection is possible;
- There is no technical limit (distance) to which a solar reflection is possible towards a surrounding railway line however, the significance of a reflection decreases with distance. This is because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases;
- Seasonal variations or additional development may change the view from a receptor location towards the solar panels or building development over time;
- Terrain and shielding by vegetation are also more likely to obstruct an observer's view at longer distances;
- In general, the geometry of the relationship between typical ground mounted solar panels and the movement of the Sun in the northern hemisphere means that railways due east and west of the panels are most likely to view a solar reflection for traditional south facing arrays panels. Railways that are north or south of the panels are very unlikely to experience a solar reflection;
- For building developments and for solar developments that have solar panels orientated at azimuth angles other than south, solar reflections may be directed in alternate directions;

⁴⁰ Hadlow Solar Farm, Off Sherenden Road, Tudeley, Kent, England.

⁴¹ Tower Hayes Solar Farm, near Stanton under Bardon, Leicestershire, England.

8.3 The following subsections present the recommended methodology for assessing the impact upon railway safety.

Identifying Receptors – Railway Infrastructure

8.4 The following process should be used for identifying receptors⁴²:

1. Identify whether a railway line or railway infrastructure is present within 100m of the solar or building development ;
2. If visual line of sight exists between the proposed solar or building development and the railway line, then a solar reflection could be experienced if it is geometrically possible. If there is no line of sight, then a reflection cannot be experienced;
3. Assess a length of railway line, choosing individual receptor locations no more than 200 metres apart out to up to 500m from the development location. This is shown in Figure 14 on the following page with reference to a solar development;
4. An additional height should be added to the ground level height to represent the typical viewing height of a train driver. For train drivers, a height of 2.75 metres is recommended;
5. Identify any other railway infrastructure that may be present within 500m of the proposed development. This includes railway signals and crossings;
6. Use the height and location data for feeding into the geometric solar reflection model.

⁴² Railway signals are discussed separately, beginning paragraph 8.13.

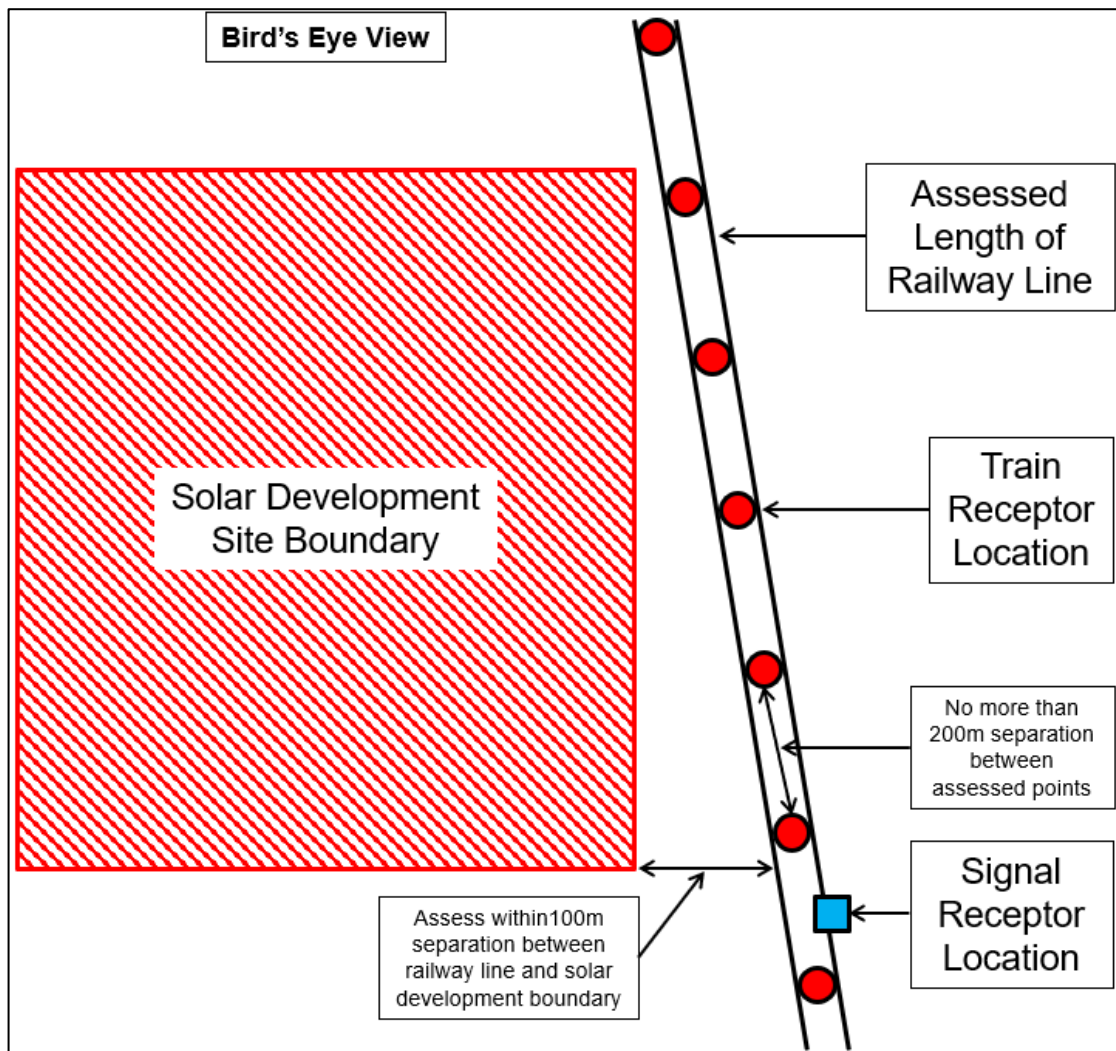


Figure 14 Illustration showing receptor identification process – train drivers and signals

Assessment Process

- 8.5 The following process should be used for modelling glint and glare for a railway line:
1. Define the solar PV development solar panel area or building façade;
 2. Undertake geometric calculations for train drivers and any other railway infrastructure, as outlined within Section 4 of this guidance;
 3. Produce a solar reflection chart to determine whether a solar reflection is geometrically possible;
 4. Assess the results of the geometric glint and glare assessment in the context of the following:
 - a. Sun location relative to the solar panels or façade;
 - b. Location of the reflecting solar panels or façade relative to the railway line, direction of trains and key infrastructure, such as railway signals;
 - c. Existing screening;

- d. Proposed screening;
5. Consider train driver workload;
6. Assess the intensity of the solar reflection, if appropriate;
7. Determine whether a solar reflection is significant;
8. Consider mitigation, if required.

Determination of Significant Effects

8.6 A train driver travelling on a section of railway line where a solar reflection is geometrically possible would experience a solar reflection that is fleeting in nature. This is because a train will typically be moving at speeds anywhere up to 120mph (~190kph). This means that the duration of a predicted solar reflection is mostly dependent on the speed of the train travelling past the solar PV or building development at the time when a solar reflection is geometrically possible. Therefore, the location of origin of the solar reflection is more significant than its duration because the receptor is moving.

8.7 There are examples of solar PV and building developments where solar reflections are geometrically possible towards an adjacent railway line. Experiencing a solar reflection does not necessarily mean there is a significant effect requiring mitigation. The following criteria should be considered when determining the significance of a solar reflection towards a train driver or train infrastructure:

- Is the solar reflection incident to direct sunlight?
- Does the affected length of railway have a signal, crossing or switch/set of points?
- Does the solar reflection appear in line with, or close to, the direction of travel?
- What is the length of railway that may experience a solar reflection?
- What is the intensity of the solar reflection?⁴³

8.8 For south facing solar panels at standard inclinations⁴⁴ it is likely that the Sun will be incident to the solar reflections in the UK and Ireland. Whether the solar reflection appears in line with, or close to, the direction of travel depends on the geographic location of the surrounding railway relative to the solar PV development. This, along with the size of the proposed solar PV development, determines the length of railway line that may be affected.

8.9 For building developments, the scenarios in which solar reflections can occur can vary significantly.

⁴³ The intensity of any calculated solar reflection may be requested by the railway stakeholder. An assessment methodology aligned with the methodology produced for aviation receptors can be utilised (Section 9).

⁴⁴ Typically 15-35 degrees in the UK and Ireland

8.10 Because the length of time a solar reflection can last is mostly dependent on a train's speed rather than the solar PV or building development, the length of time that a solar reflection can last is not considered when determining its significance. Instead, the location of origination of the solar reflection, length of railway and infrastructure present on the assessed railway line are considered.

8.11 The process outlined in the flow chart below (Figure 15) is recommended when determining whether a solar reflection should be deemed significant and mitigation implemented.

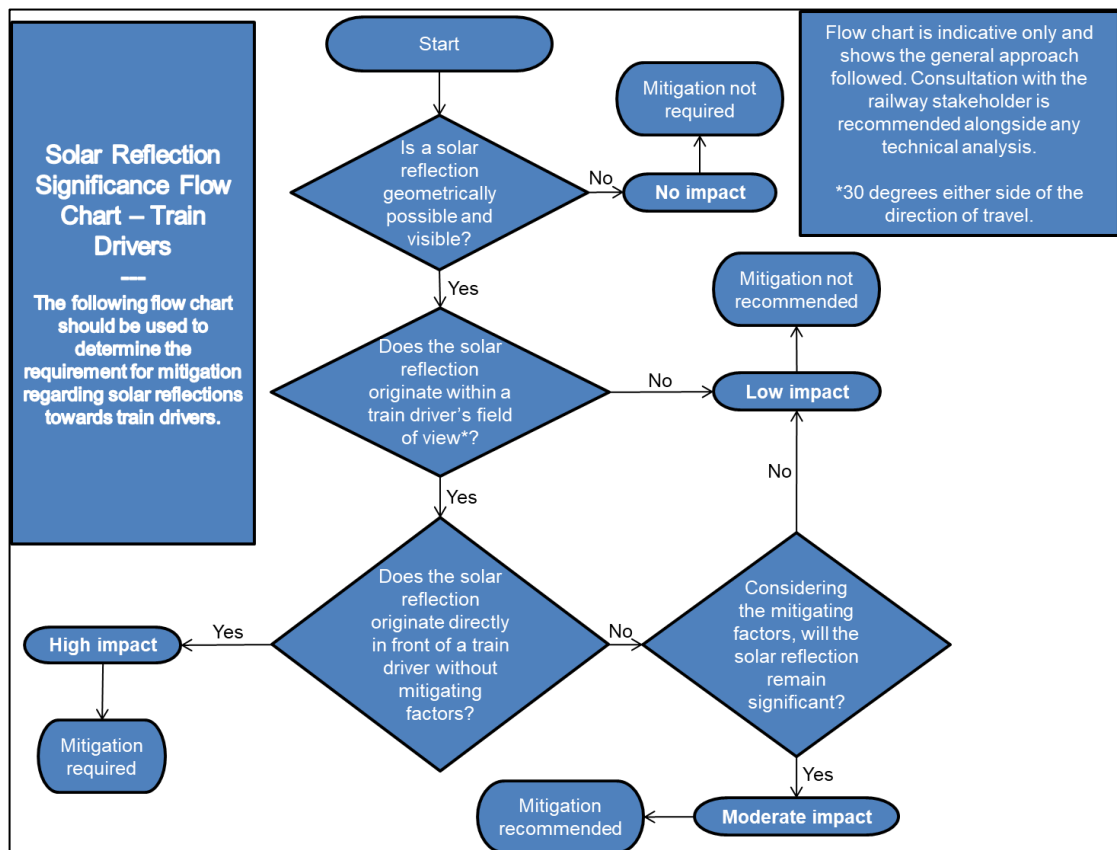


Figure 15 Train driver impact significance flow chart

8.12 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

Other considerations

Railway Signals

8.13 Railway signal lights are located immediately adjacent to or above a railway line and are used to direct trains on the lines. In some instances, signals may be difficult to identify and therefore consultation with the railway stakeholder may be beneficial to identify their location and specification. An assessment may be required because of the potential for a phantom aspect illusion occurring. The definition of phantom aspect is presented below.

'Light emitted from a Signal lens assembly that has originated from an external source (usually the Sun) and has been internally reflected within the Signal Head in such a way that the lens assembly gives the appearance of being lit⁴⁵.'

8.14 A phantom aspect is caused when the incoming light is of an intensity which causes a light signal to appear illuminated when it is not switched on. This is a particular problem for filament bulbs with a reflective mirror incorporated into the bulb design.

8.15 No known studies have shown that a phantom aspect illusion is possible due to a solar reflection from a solar panel or glass. Furthermore, modern LED signals are designed to reduce or completely eliminate the likelihood of a phantom aspect illusion occurring and many have hoods attached to reduce the risk of incoming direct light illuminating the signal lens directly. Nevertheless, following consultation with railway operators, it is recommended that an assessment of all signal lights be undertaken. A railway signal location should also be considered where there may be solar reflections towards a train driver on the railway line where the signal is present. This is because a train driver's workload may be higher where signals are present,

⁴⁵ Glossary of Signalling Terms, Railway Group Guidance Note GK/GN0802. Issue One. Date April 2004.

increasing the potential impact as a result of the solar reflection. If the assessed reflectors are not in line of sight to the signal lens, then no phantom aspect illusion is possible.

8.16 The process outlined in the flow chart below (Figure 16Figure 15) is recommended when determining whether a solar reflection should be deemed significant and mitigation implemented.

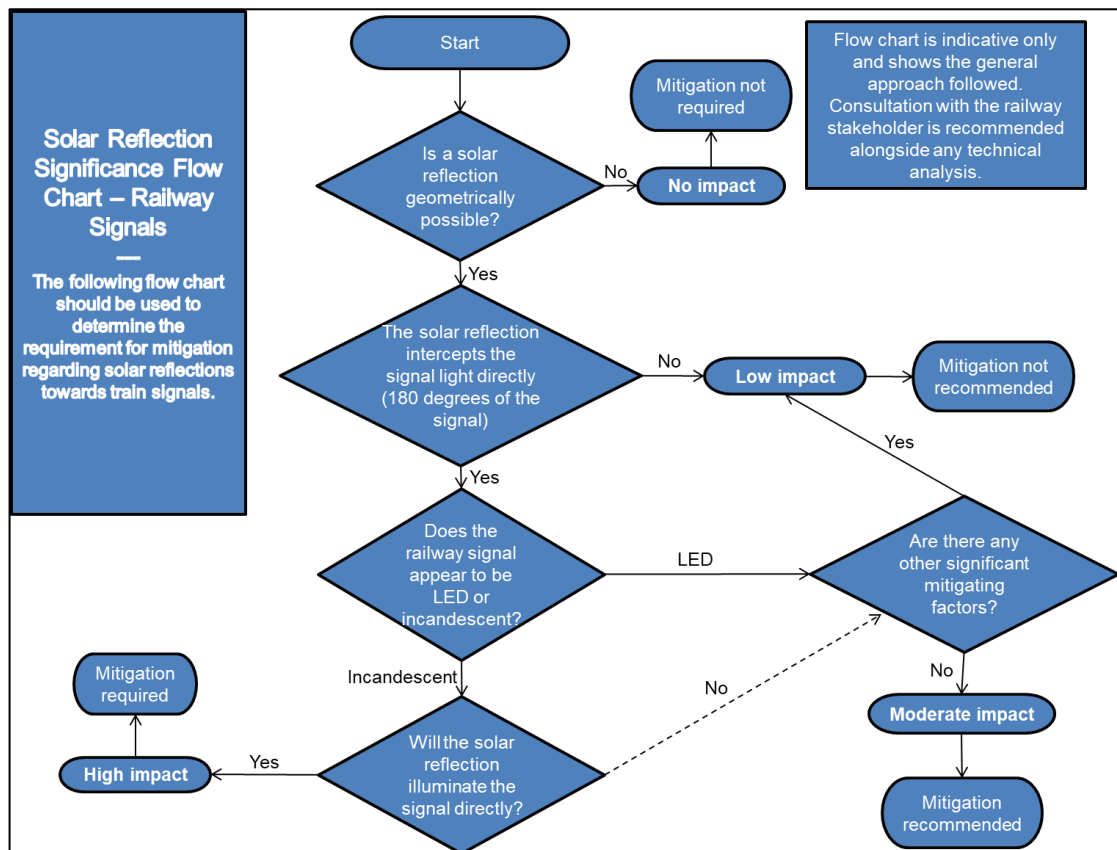


Figure 16 Railway signal impact significance flow chart

8.17 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

Level Crossings and Level Crossing Warning Lights (LCWL)

8.18 For determining the impact of glint and glare upon level crossings with respect to road users, follow the 'road users' assessment methodology presented in Section 7. For LCWLs, follow the assessment of railway signals as presented in Section 8.16 above. In both instances, consultation with the railway and/or road stakeholder is advised.

Switches/Set of Points

8.19 Switches and sets of points are present on sections of track where a train may cross from one section of a railway line to another. Where this occurs, a train driver's workload may be increased, and the effect of a solar reflection may increase the significance of a solar reflection.

Conclusions

8.20 The size of the reflector area and visibility of the reflectors relative to static infrastructure (such as signals) will determine the duration of the solar reflection. For moving trains, their speed will be the overall determining factor with regard to the duration of the solar reflection. Consultation with the railway stakeholder is recommended to determine the requirement for assessment, identify particular receptors and determine whether mitigation is required.

9 ASSESSING THE IMPACT UPON AVIATION OPERATIONS

Overview

9.1 Solar PV developments and aviation activity can safely co-exist and there is a growing number of examples of both on-aerodrome and near aerodrome solar PV developments. Safeguarding an aerodrome and its aviation activity is essential, and glint and glare effects may cause a safety concern under certain conditions. Therefore a glint and glare assessment of a proposed solar PV development is essential when it is to be sited in the vicinity of an aerodrome.

9.2 More recently, the effect of solar reflections from building developments with surfaces capable of producing specular solar reflections has been raised as a potential concern at a number of UK airports.

9.3 This section presents a recommended assessment approach, based on previous guidance and experience within the UK and internationally for on and off-aerodrome developments.

Key Considerations

9.4 The two main receptors that require consideration within an aviation glint and glare assessment are pilots in aircraft and air traffic controllers in the Air Traffic Control (ATC) Tower. Helipads and alternate aviation receptors are considered separately within this sector.

9.5 Whilst a proposed solar PV development may be located such that air traffic controllers have no view of the solar panels, pilots navigating the airspace above will almost certainly have a view of the solar panels. Where a view of the solar panel exists, a solar reflection may be possible. A view of a solar panel does not however guarantee that a solar reflection is possible.

9.6 There is no technical limit (distance) within which a solar reflection is possible towards the ATC Tower or pilots, however the significance of a reflection decreases with distance. This is because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases.

9.7 On-aerodrome reflections may be considered more significant than those that originate outside of the aerodrome's boundary, particularly at greater distances.

9.8 Seasonal variations or additional development may change the view from the ATC tower towards the solar panels over time.

9.9 Terrain and shielding by vegetation are also more likely to obstruct an air traffic controller's view at longer distances.

9.10 In general, the geometry of the relationship between typical ground mounted solar panels and the movement of the Sun in the northern hemisphere means that ATC towers due east and west of the panels are most likely to view a solar reflection for south facing arrays panels. ATC towers north or south of the panels are very unlikely to experience a solar reflection unless the solar PV development and ATC Tower are in close proximity i.e. an on-aerodrome development.

Pilots may experience solar reflection from a greater number of locations because of the changing location and altitude of the aircraft.

9.11 For building developments and for solar developments that have solar panels orientated at azimuth angles other than south, solar reflections may be directed in alternate directions.

9.12 The key considerations listed in the sections above are broadly the same for both solar and building developments.

Identifying Receptors – Aerodromes

9.13 The following process should be used for identifying the requirement for assessment:

1. Identify aerodromes within 30km of the proposed solar PV development. Complete the following depending on proximity;
 - a. Within 5km: consult with the aerodrome, complete a glint and glare assessment;
 - b. Within 5-10km: consult with the aerodrome, the aerodrome is likely to request a glint and glare assessment;
 - c. 10km-30km: consider consultation with certified and licensed aerodromes, the aerodrome may request a glint and glare assessment;
 - d. 30km+: consultation and assessment not considered a requirement, however requests for assessment have been requested beyond 30km.
2. Solar developments are becoming greater in scale, where appropriate, it may be prudent to extend the lower limits and conduct detailed analysis for licensed aerodromes.

9.14 If a glint and glare assessment is to be completed, follow the process outlined below for identifying receptors:

1. Identify any existing or proposed ATC Towers (if there is one) and approach routes for all existing or proposed runways;
2. If visual line of sight exists between the proposed solar PV development and the ATC Tower, then a solar reflection could be experienced if it is geometrically possible;
3. If there is no line of sight, then a reflection cannot be experienced;
4. Assess a 2-mile⁴⁶ approach path towards the runways using the following criteria;
 - a. Starting point taken at 50 feet (15.2m) above the runway threshold;
 - b. Measure out to 2 miles from the runway threshold using a 3 degree descent path (unless requested otherwise or as per the published aeronautical approach procedures);

⁴⁶ A statute mile (1.61km).

- c. Take reference aircraft locations at no more than $\frac{1}{4}$ mile intervals (minimum of nine points over 2-miles);
5. An additional height should be added to the ground level height to represent the viewing height of an air traffic controller within the ATC Tower;
6. Use the height and location data for feeding into the geometric solar reflection model. Figure 17 below shows the process for identifying aviation receptors.

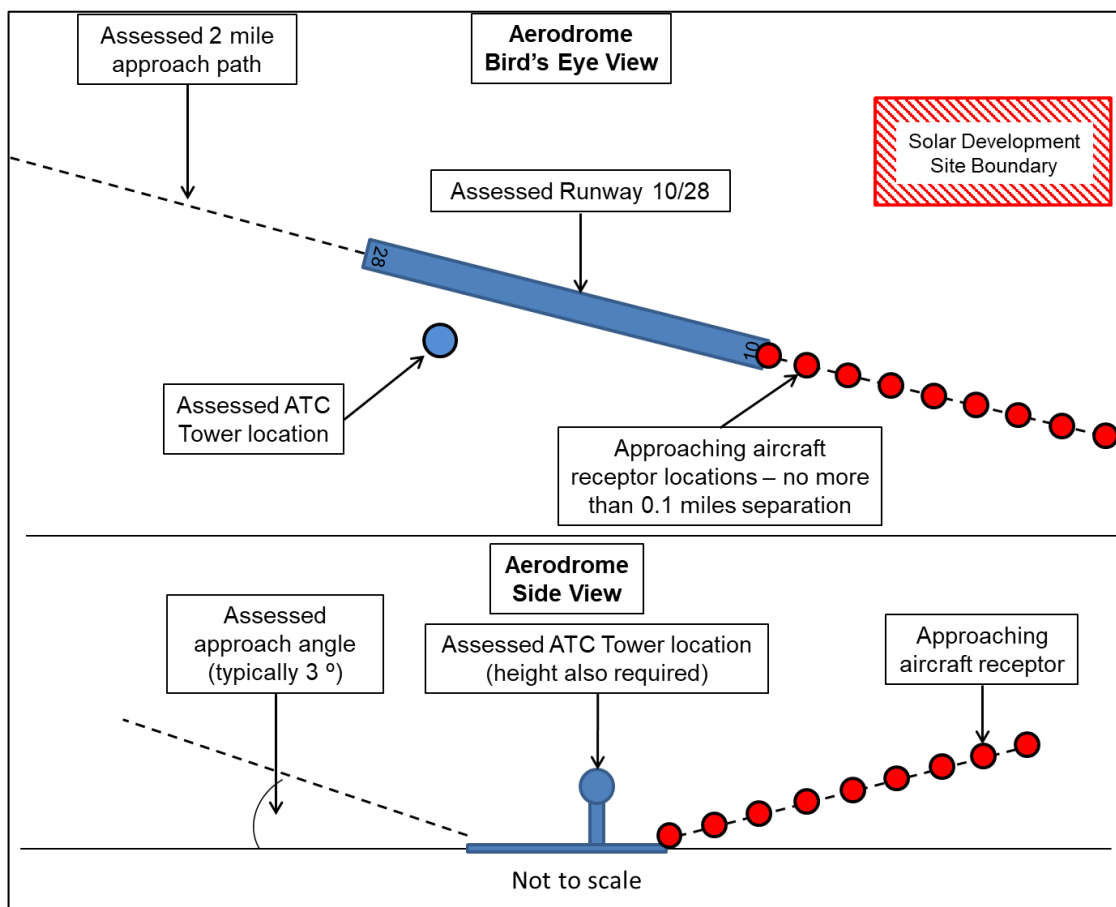


Figure 17 Illustration showing receptor identification process – aviation

Assessment Process

9.15 The following process should be used for modelling glint and glare effect for aviation activity:

1. Define the solar PV development solar panel area;
2. Undertake geometric calculations, as outlined within Section 4 of this guidance;
3. Produce a solar reflection chart to determine whether a solar reflection is geometrically possible;
4. Assess the results of the geometric glint and glare assessment in the context of the following:
 - a. Sun location relative to the solar panels;

- b. Location of the reflecting solar panels relative to the ATC Tower and/or aircraft location;
- c. Consideration of existing screening (ATC Tower only);
- d. Consideration of proposed screening (ATC Tower only);
- 5. Determine whether a solar reflection is significant;
- 6. Consider mitigation, if required.

Building Developments

9.16 The process for assessing reflective façades on building developments is similar to those for solar panels however the FAA guidance was never strictly applicable to reflective surfaces other than solar panels and therefore the significance of a reflection, as per the sections below, can be considered for reference from a technical perspective but should not be the sole determining factor in assigning an impact significance.

Determination of significant effects

Air Traffic Control

9.17 An air traffic controller uses the visual control room to monitor and direct aircraft on the ground, approaching and departing the aerodrome. It is essential that air traffic controllers have a clear unobstructed view of the aviation activity. The key areas on an aerodrome are the views toward the runway thresholds, taxiways and aircraft bays.

9.18 Whilst the FAA guidance has since been updated, the previous 2013 FAA guidance states that no solar reflection towards the ATC tower should be produced by a proposed solar PV development, and it is this guidance that many aerodromes still refer to:

'1. No potential for glint or glare in the existing or planned Airport Traffic Control Tower (ATCT) cab...'

9.19 However, it is recommended that any predicted solar reflection should be assessed pragmatically. Therefore, the following should be considered when determining whether a solar reflection is significant:

- 1. The predicted intensity of the solar reflection;
- 2. Location of origin of the solar reflection relative to the ATC Tower;
- 3. Distance between the reflecting surfaces and the ATC Tower;
- 4. Solar reflection duration per day;
- 5. Number of days a solar reflection is geometrically possible per year;
- 6. The time of day when a solar reflection is geometrically possible.

9.20 Determining a period of time and location from which a predicted solar reflection is considered significant will depend on the operations at a particular aerodrome.

9.21 The process outlined within the flow chart on the following page (Figure 18) is recommended when determining whether a solar reflection should be deemed significant and mitigation implemented.

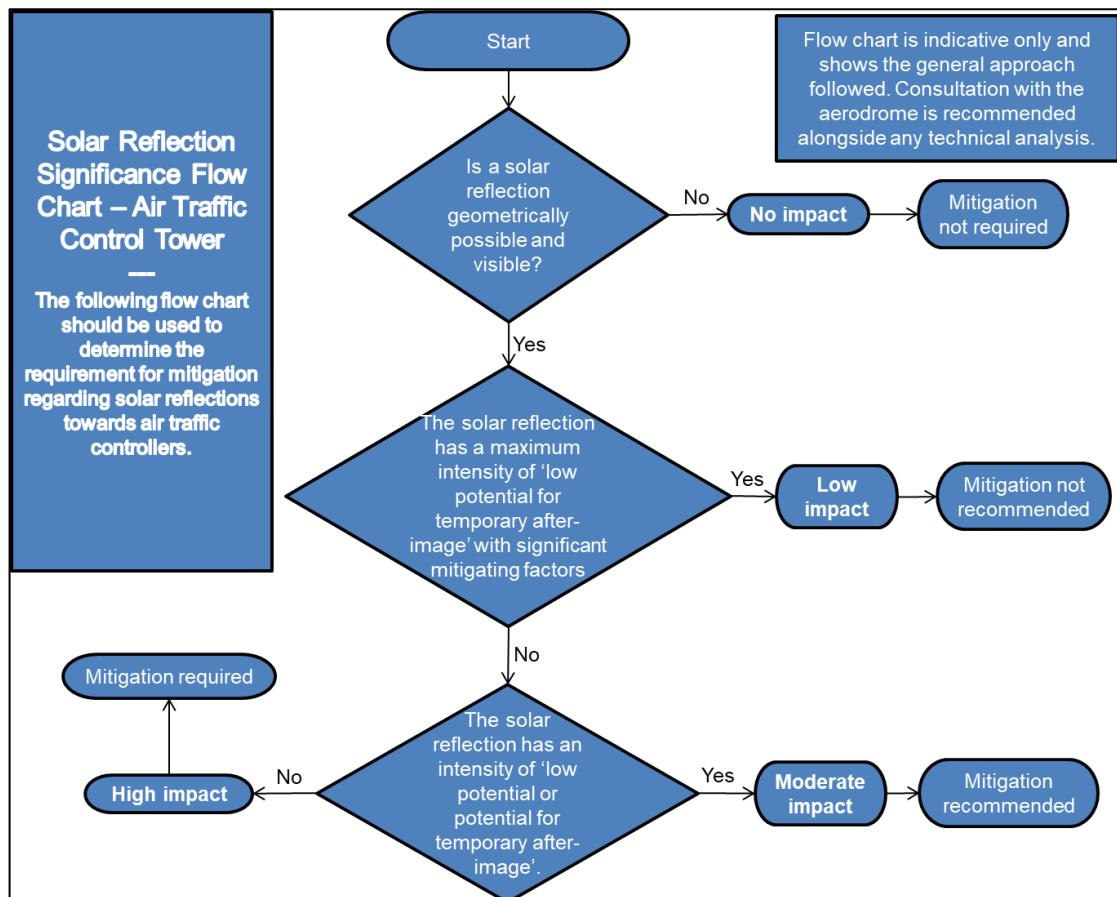


Figure 18 ATC tower impact significance flow chart

9.22 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

Approaching Aircraft

9.23 A pilot flying a 2-mile final approach path where a solar reflection is geometrically possible would experience a fleeting solar reflection as the aircraft travels through the solar reflection zone. This means that the duration of a predicted solar reflection is dependent on the speed of the aircraft above the solar PV development at the time when a solar reflection is geometrically possible. Therefore, the location of origin of the solar reflection is more significant than its

duration because it is a fast-moving receptor. The time at which the solar reflection may occur should however be considered.

9.24 There are examples of solar PV developments where solar reflections are geometrically possible towards approaching aircraft. Experiencing a solar reflection does not guarantee a significant effect requiring mitigation, however there are criteria that should be considered when determining the significance of a solar reflection and mitigation requirements, these are:

- Is the solar reflection incident to direct sunlight?
- Does the solar reflection originate from near to a runway threshold or other location of operational significance?
- What is the length of approach path that can experience a solar reflection?
- Does the solar reflection occur at a significant time?
- Does the solar reflection occur for a significant period of time?
- What is the intensity of the solar reflection?

9.25 Further comments regarding the solar reflection intensity and its effect on the significance is presented in the following sub-section.

Solar Reflection Intensity

9.26 Many UK and international aviation stakeholders have adopted the FAA guidance (2013-2018) with respect to glint glare. Along with the initial guidance, Sandia National Laboratories developed the Solar Glare Hazard Analysis Tool (SGHAT) model which is no longer freely available. This model can be used to determine the intensity of a solar reflection which is significant when determining the impact upon approaching aircraft.

9.27 The FAA 2013 guidance stated:

2. No potential for glare or “low potential for after-image” (shown in green in Figure 1) along the final approach path for any existing landing threshold or future landing thresholds (including any planned interim phases of the landing thresholds) as shown on the current FAA-approved Airport Layout Plan (ALP). The final approach path is defined as two (2) miles from fifty (50) feet above the landing threshold using a standard three (3) degree glide path.

9.28 Whilst the FAA stance has since changed (2021), it is still recommended that the previous 2013-2018 FAA guidance is used as a basis for assessment, along with a pragmatic approach to determining whether a predicted solar reflection may indeed be a hazard to aviation safety.

9.29 The process outlined within the flow chart (Figure 19) on the following page is recommended when determining whether a solar reflection should be deemed significant and mitigation implemented.

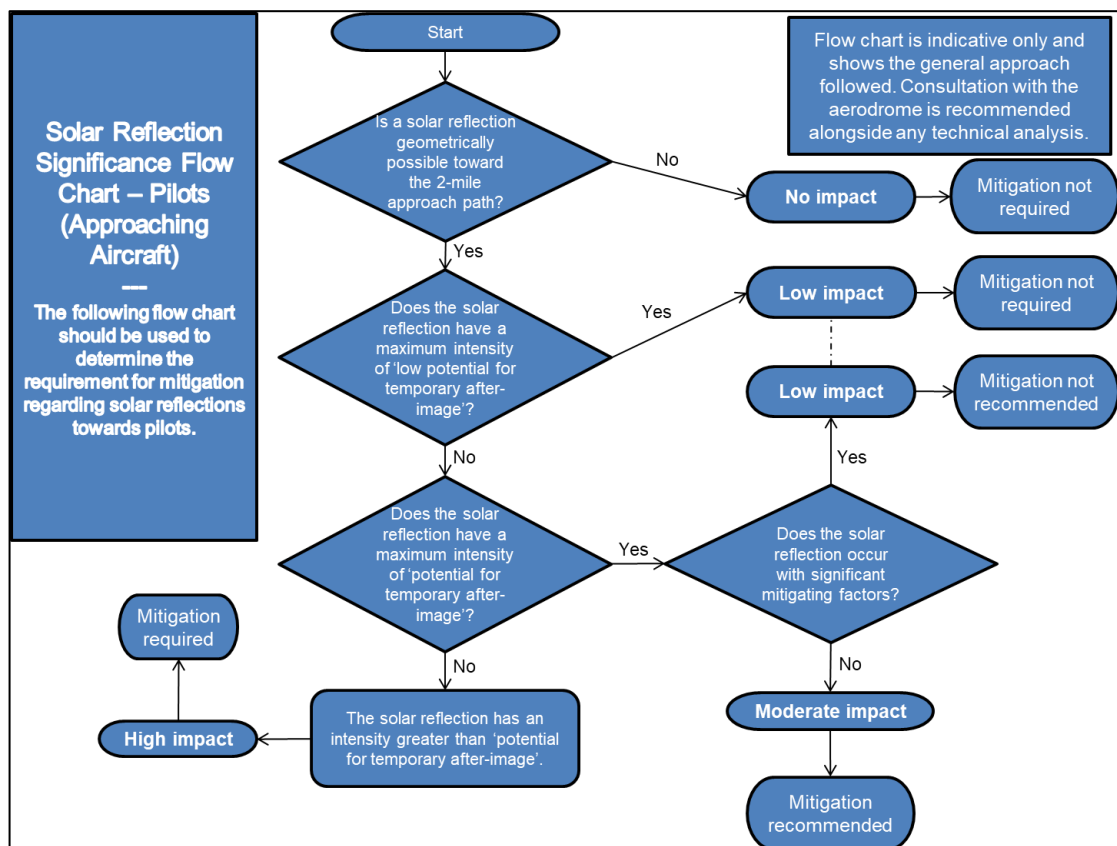


Figure 19 Pilots (approaching aircraft) impact significance flow chart

9.30 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

Helipads

9.31 Where helipads are present, a glint and glare assessment may be required. Therefore, Pager Power's has developed a standard methodology to determine the significance of a solar reflection towards a helicopter pilot on approach towards a helipad. The approach paths are assessed within the glint and glare assessment because they are considered to be the most critical stage of the flight.

9.32 In the absence of (or in addition to) the provision of specific helicopter approach routes, the Pager Power approach for determining helicopter approach paths is to select locations along each bearing (spaced at maximum of 10 degrees) based on the centre point of the helipad out to a distance of 2 miles, spaced every 0.1 mile. All possible approach paths are assessed unless specified or requested otherwise. The altitude of the aircraft is based on a 10 degree descent⁴⁷

⁴⁷ Normal helicopter descent angle on approach.

path referenced to 2m above the helipad centre point (approximate eye level of a helicopter pilot).

9.33 Similarly, to the assessment for fixed wing aircraft on approach, the location, duration, time and intensity of the solar reflection are considered to determine whether an impact may be significant. The flow chart presented in Figure 17 can therefore be followed to determine the impact significance. Results should be considered on a case-by-case basis.

Other Considerations

Circling Aircraft, Visual Manoeuvring Areas, Visual Circuits and En-Route Aircraft

9.34 Some aerodromes may request that circling aircraft, visual manoeuvring areas, visual circuits and en-route aircraft be assessed. If requested, the requirements of the assessment should be considered on a case-by-case basis and through consultation with the aerodrome. A typical assessment for aircraft in the Visual Manoeuvring Area (VMA) is as follows:

- Glint and glare calculations are undertaken for points spaced at regular intervals across a 10km radius circle centred above the airport at an altitude of 1500 feet above mean sea level⁴⁸;
- For each point where glint and glare is possible, the glare is classified in accordance with FAA standards;
- Where glint and glare is predicted to have 'potential for temporary after-image' or greater, the following should be completed:
 - The results will be overlaid on the published ICAO⁴⁹ Visual Approach Chart for the airport or similar;
 - An operational assessment should be undertaken using the overlaid Visual Approach Chart, considering the following:
 - Visual Holding Patterns;
 - Visual Reporting Points;
 - Aircraft joining approach from Visual Hold;
 - Other Visual Approach Chart features.
- Considering all of the above, it should be determined whether a significant impact is expected;
- Where glint and glare is not predicted or predicted to have a 'low-potential for temporary after-image', there will be no significant impact.

⁴⁸ Specific request may vary from an aerodrome depending on its operations.

⁴⁹ International Civil Aviation Organisation – ICAO. Chart usually available from the relevant national aviation stakeholder or aerodrome.

Conclusions

9.35 The size of the solar panel area and visibility of the reflecting solar panels relative to static infrastructure (such as the ATC Tower) will determine the duration of the solar reflection. The same is true for a reflective façade on a building development. For moving aircraft, its speed will be the overall determining factor with regard to the duration of the solar reflection. Consultation with the aviation stakeholder is essential to determine the requirement for assessment. It is recommended to consider aerodromes within 30km, though a detailed assessment may not be required.

10 OVERALL CONCLUSIONS

Overview

10.1 The purpose of this guidance document is to provide solar PV and building developers, planners and stakeholders with an assessment process for determining the effect of glint and glare (solar reflections) upon receptors surrounding a proposed solar PV or building development.

10.2 Formal guidance around glint and glare remains somewhat lacking in many cases. This guidance document has been produced to bridge this knowledge gap pertaining to the assessment of glint and glare from solar PV panels and reflective façades on building developments. The aim is to standardise an assessment process for developers, planners or stakeholders to follow.

10.3 The guidance presented within this document is based on the following:

- Reviews of existing guidance in a variety of areas;
- Glint and glare assessment experience and industry knowledge;
- Overview of available solar reflection studies.

10.4 The methodologies presented are deemed applicable for worldwide solar PV and building development.

Modelling Requirements

10.5 A geometric glint and glare assessment model must include the following:

- The Earth's orbit around the Sun;
- The Earth's rotation;
- The Earth's orientation;
- The location of the solar PV development or building development including the reflector (solar panel or façade) area;
- The reflector's 3D orientation including azimuth angle of the solar panel or façade (the orientation of the reflectors relative to north and the reflector elevation angle);
- Local topography including receptor and panel or façade heights above mean sea level.

10.6 For increased accuracy, the model could account for the following:

- Terrain at the visible horizon;
- Local time zone and daylight savings times;
- Consideration of sunrise and sunset times;
- Determine which solar panels create the solar reflection within the solar PV development;

- Determine what area of the façade create the solar reflection from the building development;
- Azimuth range of the Sun⁵⁰ when a solar reflection is geometrically possible;
- Vertical elevation range of the Sun when a solar reflection is geometrically possible;
- High-resolution analysis i.e. undertaking multiple geometric calculations within the given solar PV development or façade area. For example, at intervals of between 1 and 20 metres;
- Consideration of the effect of non-specular reflective surfaces e.g. masonry between glass façades;
- The intensity⁵¹ of any solar reflection produced.

Assessment Inputs – Receptors

10.7 The following paragraphs set out the key distances for identifying receptors and the height data which should be included.

10.8 Dwellings within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level within the relevant floor of the dwelling should also be considered. Dwellings are not typically assessed for building developments.

10.9 Roads within approximately 1km of a proposed solar PV development that may have a view of the PV panels should be assessed. Terrain heights and an additional height to account for the solar panel and eye level of a road user should also be considered. Roads are not typically assessed for building developments.

10.10 Where railway infrastructure is located within approximately 100m of a proposed solar PV or building development that may have a view of the PV panels, an assessment should be undertaken. Train drivers out to 500m should be assessed. Any signals, crossings or vital railway infrastructure within 500m that could be affected by glare should be assessed especially where railway signal utilises incandescent bulb⁵² technology and/or where no hood is attached. Terrain heights and an additional height to account for the solar panel/façade and eye level of a train driver or the height of a railway signal should also be considered.

⁵⁰ The azimuth range is the angle between the Sun and North, measured clockwise around the receptor's horizon. The Sun azimuth range shows the location of the Sun when a geometric solar reflection is possible. Therefore, it is possible to determine whether the Sun and the solar reflection are both likely to be visible to a receptor.

⁵¹ In W/cm² at the retina, for example.

⁵² Non-LED.

10.11 Aviation receptors out to 30km⁵³ from a proposed PV development should be considered to determine the requirement for assessment, if any. The typical receptors include the Air Traffic Control (ATC) tower and a 2-mile approach path for the relevant runway approaches. Additional receptors may be included where a solar reflection may be deemed a hazard to safety e.g. helipad approaches and the visual manoeuvring area (VMA). Aviation infrastructure is similarly assessed for building developments.

Assessment Significance

10.12 Determining the significance of a solar reflection varies for each receptor type. In general, the significance criteria for glint and glare effects are as follows:

- No Impact – A solar reflection is not geometrically possible or will not be visible from the assessed receptor. No mitigation required;
- Low – A solar reflection is geometrically possible however any impact is considered to be small such that mitigation is not recommended e.g. intervening screening will limit the view of the reflecting solar panels significantly or the glare time per year is considered negligible. No mitigation recommended;
- Moderate – A solar reflection is geometrically possible and visible however it occurs under conditions that do not represent a worst-case scenario e.g. a solar reflection originates from a less sensitive location. Mitigation recommended;
- High – A solar reflection is geometrically possible and visible under conditions that will produce a significant impact. Mitigation will be required if the proposed development is to proceed.

10.13 There may be instances where the solar reflection scenario does not fall accurately within the significance categories. Where this occurs, detailed consideration of the receptors and the modelling results should be undertaken.

10.14 See the following sections where the process for determining the significance of a solar reflection is described for each receptor type:

- Section 6 – Dwellings;
- Section 7 – Road infrastructure;
- Section 8 – Railway infrastructure;
- Section 9 – Aviation infrastructure.

10.15 In each section, the process for determining the significance of a solar reflection is described comprehensively.

⁵³ Aviation stakeholders can and have requested a glint and glare assessment beyond 30km.

Guidance Conclusions

10.16 This guidance should be followed to ensure comprehensive assessment of solar PV and building developments with respect to glint and glare. This guidance is applicable for solar PV and building development anywhere in the world.



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