



East Pye Solar Applicant's Position Statement on Aviation

Revision 1

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1 Introduction

1.1 Purpose and Context

- 1.1.1 This Applicant's Position Statement has been prepared on behalf of East Pye Solar Limited (the 'Applicant') in relation to the application for a Development Consent Order (DCO) for East Pye Solar (the 'Scheme'). It provides the Examining Authority (ExA) with a clear account of the Applicant's position on aviation operations and safety, the engagement undertaken and proposed, the matters that remain in disagreement, any further information required, and the mitigation measures identified.
- 1.1.2 The position statement has been prepared in response to the **ExA's Rule 6 letter [PD-005]**. The ExA noted relevant representations concerning potential effects on aviation-related operations and safety, including those submitted by Norfolk Gliding Club (NGC) **[RR-1452]** at Tibenham Airfield and the General Aviation Awareness Council (GAAC) **[RR-0664]**.
- 1.1.3 The ExA requested that the Applicant undertake further engagement with these interests before the Examination and provide a position statement at Procedural Deadline A on 1 September 2026.
- 1.1.4 The ExA separately requested Statements of Common Ground (SoCG) with NGC and GAAC. Those documents record matters agreed and not agreed between the parties and will evolve during the Examination as engagement progresses. This position statement will inform the draft Statements of Common Ground to be submitted at Deadline 1 (6 October 2026).

1.2 Scope and structure of this report

- 1.2.1 In accordance with the ExA's request, this position statement is structured around the following matters:
- Details of ongoing and future engagement with NGC and GAAC;
 - An outline of the matters of disagreement between the relevant parties concerning aviation operations and safety;
 - Details of any further or supplementary surveys and information required, including timescales for completion where these have not already been undertaken;
 - Details of any mitigation measures required; and
 - A summary of the Applicant's approach and response to aviation matters affecting airfields and flight paths, including military flight paths, near the Order limits, together with potential cumulative effects with other projects, including the Norwich to Tilbury project.

2 Engagement with Aviation Parties

2.1 Norfolk Gliding Club

- 2.1.1 The Applicant has undertaken non-statutory engagement with NGC on aviation matters relevant to the Scheme, including glint and glare, engine failure after take-off (EFATO) and thermal updrafts. A summary of the engagement undertaken to date is provided in Table 2.1.

Table 2.1: Summary of engagement with NGC

Date / period	Nature of engagement	Summary of engagement
28 October 2024	Non-statutory consultation via email	Pre-application consultation regarding glint and glare, EFATO and thermal updrafts.
26 November 2024	Non-statutory consultation via email	Further pre-application consultation, with an initial response received from NGC on 26 November 2024.
December 2024 to April 2025	Ongoing email correspondence	Ongoing exchange of emails between the Applicant and NGC throughout December 2024 and January, February and April 2025.
23 January 2025	Non-statutory consultation via on-airfield meeting	On-airfield meeting to discuss concerns regarding glint and glare and additional aviation matters.
January 2025 to June 2025	Non-statutory consultation	Engagement to establish key receptors to be considered within the glint and glare assessment. The technical information required to model the receptors for the glint and glare assessment could not be confirmed by the airfield at this stage.
July 2025	Statutory Consultation	NGC provided an objection to the Glint and Glare Report during statutory consultation, the Applicant's response to the points raised in this report are provided in Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-034] at code EPS2_EF_023.
5 January 2026	Non-statutory consultation via on-airfield meeting	On-airfield meeting at which the technical information required to model the receptors for the glint and glare assessment was confirmed by the airfield. Appendix B of the High Level Investigative Report [APP-222] contains the Tibenham Airfield circuit dimensions shared by Norfolk Gliding Club, which were confirmed as applicable to the

Date / period	Nature of engagement	Summary of engagement
		Scheme at an onsite meeting on 5 January 2026, showing the Applicant has engaged directly with NGC and used their information to inform the assessments.
Submitted to PINS 29 May 2026 – published by PINS 1 July 2026	Relevant Representation	Response drawing attention to the potential risks posed by the proposed solar farm on the aviation operations of NGC.
19 August 2026	Email	Email inviting NGC to undertake a SoCG and proposing a meeting on week commencing 7 th September.

2.2 General Aviation Awareness Council

- 2.2.1 The Applicant has undertaken pre-application consultation with GAAC on aviation matters relevant to the Scheme, including glint and glare, EFATO and thermal updrafts. A summary of the engagement undertaken to date is provided in Table 2.2.

Table 2.2: Summary of engagement with GAAC

Date / period	Nature of engagement	Summary of engagement
Pre-application stage	Pre-application consultation	Consultation in conjunction with NGC regarding glint and glare, EFATO and thermal updrafts.
3 December 2024	Correspondence received	Initial correspondence received from GAAC.
5 April 2025	Response received	Response received by the Applicant from GAAC to the Applicant's East Pye Solar Phase One Consultation Summary Report.
14 July 2025	Correspondence received	Response received by the Applicant from GAAC to the Applicant's preliminary environmental information report.
Submitted to PINS 1 June 2026 – published by PINS 1 July 2026	Relevant Representation	GAAC raised concerns regarding aviation safety, engagement with NGC, glint and glare assessment, and the assessment of effects on Tibenham Aerodrome.

Date / period	Nature of engagement	Summary of engagement
19 August 2026	Email	Email inviting GAAC to undertake a SoCG and proposing a meeting on week commencing 7 th September.

2.3 Ongoing and future engagement

- 2.3.1 On 19 August 2026, the Applicant contacted GAAC and NGC inviting them to engage in the preparation of a SoCG and requesting a meeting during the week commencing 7 September 2026.
- 2.3.2 The Applicant is currently in the process of setting up a meeting with both NGC and GAAC to discuss the matters in the SoCGs to take place in September 2026. In the meantime, the Applicant has prepared full responses to each party's relevant representation which has been submitted at Procedural Deadline A alongside this position paper.

3 Matters of Disagreement

3.1 Introduction

- 3.1.1 The matters of disagreement set out in this section align with the draft Statements of Common Ground being prepared with NGC and GAAC. At the time of submission, the relevant Statements of Common Ground have not been signed off by either party. As such, the matters identified are likely to evolve through further engagement and will be updated in the Statements of Common Ground to be submitted at Deadline 1 and across the Examination.
- 3.1.2 Table 3.1 summarises the principal matters of disagreement based on the engagement and submissions made so far.

Table 3.1: Summary of matters of disagreement with NGC

Matter	Summary of consultee position	Applicant Position
Aviation Operations		
Engagement and consultation with Tibenham Airfield	NGC considers that there was insufficient meaningful engagement during the design and assessment process, and that engagement took place primarily in response to requests from the Club.	The Applicant considers that engagement has been undertaken (see Table 2.1, as well as Consultation Report Appendix 10: Section 47 Applicant Response Table [APP-034] at code EPS2_EF_023 and the High Level Investigative Report [APP-222]) and that attempts were made to obtain technical information required to inform the aviation-related assessments. A record of engagement will be provided in the relevant SoCG as well as in this position statement. The record of engagement within the SoCG will be updated as part of the SoCG process.
Thermal plume effects	NGC is concerned that thermal effects from the solar development could affect local flying conditions, including training and circuit operations.	The Applicant considers that thermal plume effects have been assessed in the High Level Investigative Report [APP-222] and are not judged to cause a significant impact, having regard to the weak nature of thermals from solar panels and expected vertical separation from aircraft.

Matter	Summary of consultee position	Applicant Position
Agent of Change principle	NGC considers that the Applicant has not demonstrated compliance with the Agent of Change principle in relation to an existing aerodrome operation.	The Applicant considers that the potential effects on Norfolk Gliding Club have been assessed through the submitted aviation-related documentation (ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] and the High Level Investigative Report [APP-222]) and that no significant effects are predicted.
Aviation Safety		
Operational safety: aerotow launches and glider launch failure	Norfolk Gliding Club is concerned that parts of the Scheme could affect emergency landing options associated with aborted aerotow launches and glider launch failure scenarios.	The Applicant considers that these matters have been assessed in the High Level Investigative Report [APP-222] and that the Scheme is not predicted to significantly reduce available space for relevant emergency scenarios.
Operational safety: Engine Failure After Take-Off	Norfolk Gliding Club considers that the Scheme could reduce available emergency landing options during Engine Failure After Take-Off and similar emergency scenarios.	The Applicant considers that Engine Failure After Take-Off matters have been assessed in the High Level Investigative Report [APP-222] and that no significant reduction in available emergency landing space is predicted based on available guidance and best practice.
Bird strike risk	Norfolk Gliding Club considers that solar panels may attract birds through the perceived lake effect, potentially increasing bird strike risk to aircraft using Tibenham Airfield.	The Applicant's position on this matter remains under discussion through the draft SoCG process. The Scheme is likely to increase nesting opportunities for agricultural passerines, such as yellowhammer, which do not pose a significant bird strike risk. No wetlands or similar habitats that could attract higher-risk species, such as gulls or Canada geese, will be created, and there is limited evidence that waterbirds are attracted to terrestrial solar arrays.
Mitigation for aviation effects	Norfolk Gliding Club considers that insufficient mitigation has been identified or provided for review in response to its concerns.	The Applicant considers that embedded design measures and the conclusions of the assessments do not identify likely significant adverse aviation effects requiring further mitigation. Where required,

Matter	Summary of consultee position	Applicant Position
		glint and glare effects could be addressed through detailed design measures.
Surveys, assessment and further works		
Adequacy of aviation assessment and glint and glare assessment	Norfolk Gliding Club disputes the conclusions of the glint and glare assessment and considers that the assessment has not been appropriately informed by the site-specific operational characteristics of Tibenham Airfield.	The Applicant considers that the relevant glint and glare and aviation assessments have been undertaken using appropriate methods, industry guidance and available information. Additionally, the ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] was updated to include assessment of the site-specific circuits and approaches only once confirmed by the Norfolk Gliding Club in January 2026. The Applicant considers that significant effects on aviation operations are not predicted.
Application of aviation guidance and best practice	Norfolk Gliding Club and the General Aviation Awareness Council consider that relevant aviation guidance and advice has not been adequately applied to the assessment of the Scheme.	The Applicant considers that relevant guidance has been considered within the technical assessments, including guidance published by relevant aviation bodies, and that the assessments are appropriate for the consenting process. The relevant guidance is outlined in both ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] and the High Level Investigative Report [APP-222] .

Table 3.2: Summary of matters of disagreement with the GAAC

Matter	Summary of consultee position	Applicant Position
Aviation Operations		
Engagement and consultation with Tibenham Airfield	The General Aviation Awareness Council considers that the Applicant has not adequately addressed aviation safety in line with Government policy and has not engaged appropriately with Norfolk Gliding Club as the operator of Tibenham Aerodrome. GAAC states that contact has been limited and that the aerodrome operator's submissions and requests have not received an appropriate or adequate response.	The Applicant has engaged with Norfolk Gliding Club through email correspondence and meetings at the airfield to understand its operations and request technical information to inform the assessments. The Applicant considers that the relevant assessments have been undertaken in accordance with available guidance, industry best practice, recognised assessment methodologies, information provided by Norfolk Gliding Club and professional judgement based on extensive industry experience.
Surveys, assessment and further works		
Tibenham Airfield: socio-economic effects	The General Aviation Awareness Council considers that Civil Aviation Authority guidance and its own requests have not been adequately addressed. GAAC considers that the Environmental Impact Assessment should have assessed human safety, recreational value, the designation of Tibenham Aerodrome as a Nationally Significant Area for Sport, socio-economic value and the impact of the Scheme on the aerodrome.	The Applicant considers that applicable guidance from safeguarding bodies, including the Civil Aviation Authority, has been considered in the technical assessments, including ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] and the High Level Investigative Report [APP-222] . The relevant guidance is identified within those appendices.

4 Further Surveys and Information

4.1 Surveys and assessments completed

- 4.1.1 The Applicant has submitted an aviation-related glint and glare assessment as part of **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]**. The assessment considered potential glint and glare effects from fixed and single-axis tracking panels on aviation receptors, including general aviation aerodromes within 15 km of the Scheme. Tibenham Airfield was identified as an assessed receptor, with modelling undertaken for runway approach paths and final sections of visual circuits. The assessment identified instances of potential “yellow” glare, meaning glare with the potential to cause temporary after-image, towards aviation receptors, including Tibenham Airfield, but concluded that these effects could potentially be operationally accommodated, subject to consultation with the relevant aerodromes.
- 4.1.2 The Applicant has also submitted the **High Level Investigative Report [APP-222]**, which specifically considered aviation matters raised in relation to Norfolk Gliding Club at Tibenham Airfield. This report assessed Engine Failure After Take-Off (EFATO), Glider Launch Failure (GLF), thermal updrafts, and turbulence and wind shear. It identified that the closest panels at Site 1A and Site 1B are approximately 1.59 km from the closest runway threshold at Tibenham Airfield.
- 4.1.3 In relation to EFATO and GLF, the **High Level Investigative Report [APP-222]** concluded that the Scheme would not significantly reduce the available space for emergency landing scenarios. The Scheme would occupy approximately 6.46% of land within the assessed 60-degree sector and 4.30% within the assessed 90-degree sector out to 2,000 m from threshold 26, leaving the majority of the assessed areas available for emergency landing.
- 4.1.4 In relation to thermal updrafts, turbulence and wind shear, the **High Level Investigative Report [APP-222]** concluded that no significant impacts are predicted. The report notes the weak nature of thermals associated with solar panels, the expected vertical separation between aircraft and the panels during circuit operations, and the limited turbulence and wind shear potential associated with solar panels compared with larger moving structures.

4.2 Further or supplementary work

- 4.2.1 The Applicant is sharing the draft Statement of Common Ground (SoCG) with the consultee to facilitate discussions on the key aviation-related matters. This engagement will focus on the sharing and review of relevant GIS data and mapping to support a clearer understanding of potential aviation effects and any interaction with other constraints across the Site.

5 Mitigation Measures

5.1 Mitigation identified

- 5.1.1 The submitted aviation assessments do not identify likely significant adverse effects on aviation operations or safety that require additional aviation-specific mitigation. The **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]** concludes that solar reflections towards assessed aerodromes, including Tibenham Airfield, could potentially be operationally accommodated, subject to consultation with the relevant aerodromes. The **High Level Investigative Report [APP-222]** also concludes that no significant impacts are predicted in respect of EFATO, GLF, thermal updrafts, turbulence or wind shear.
- 5.1.2 Mitigation relevant to glint and glare is therefore principally secured through the design and control of the Scheme. The submitted Glint and Glare Assessment identifies that, where required, solar reflections can be reduced through detailed design measures such as adjusting panel configuration, including azimuth, tilt for fixed panels and backtracking angle for single-axis tracking panels. Measures to minimise glint and glare are secured through the **Outline Construction Environmental Management Plan [APP-196]** and **Outline Operational Environmental Management Plan [APP-197]**, in accordance with Requirements 13 and 14 of the **draft DCO [AS-032]**.
- 5.1.3 The implementation of these measures would be controlled through the discharge of the relevant DCO requirements and the approved management plans. No separate aviation monitoring regime is proposed on the basis that the submitted assessments do not predict significant aviation safety effects requiring ongoing monitoring. The Applicant will continue to engage with NGC and the GAAC through the Examination and the Statements of Common Ground process.
- 5.1.4 Whilst not related to Tibenham airfield, as set out in the **Design Approach Document [APP-212]**, Solar PV Panels were removed in the eastern part of Sub-Site 10B closest to Seething Airfield as embedded mitigation within the design of the Scheme, to make sure that aircraft suffering an EFATO on departure from runway 24 at Seething Airfield would continue to have forced landing options available (see **Potential Impact on Seething Aerodrome Forced Landing Options [APP-223]**). The Applicant is willing to amend the Scheme design where necessary if assessments demonstrate a significant increase in the risk of aircraft experiencing either EFATO or GLF events.

5.2 Outstanding mitigation matters

- 5.2.1 The principal mitigation matter that remains under discussion is whether any further aviation-specific mitigation is required in response to concerns raised by NGC and the GAAC. NGC considers that insufficient mitigation has been identified in relation to aviation safety, including emergency landing

scenarios, glint and glare and operational effects at Tibenham Airfield. The GAAC similarly considers that the Applicant has not adequately addressed aviation safety or the potential effects on Tibenham Aerodrome. NGC objects to the inclusion of Site 1.

- 5.2.2 In respect of glint and glare, solar reflections towards all aerodromes could be operationally accommodated, and if required, panels can be further mitigated by changing the backtracking angle to tilt solar reflections away from receptors; further mitigation can be implemented by changing the configuration of panels, such as the azimuth, tilt (for fixed panels) and backtracking angle (for single-axis tracking panels). This is set out in the **Outline OEMP [APP-197]**.
- 5.2.3 The Applicant's position is that the submitted assessments do not identify likely significant adverse effects requiring additional aviation-specific mitigation. The Applicant considers that potential glint and glare effects can be managed through the Scheme design and secured management plans, and that the High Level Investigative Report concludes no significant effects in respect of EFATO, GLF, thermal updrafts, turbulence or wind shear.
- 5.2.4 The parties will seek to narrow or resolve these matters through continued engagement during the Examination, including the preparation and review of Statements of Common Ground. The Applicant will continue to consider any specific, evidence-based mitigation requests made by NGC or the GAAC and will update the Statements of Common Ground and, if required, this position statement, to reflect any agreed position or any remaining disagreement.

6 Applicant's Approach to Aviation Matters

6.1 Airfields near the Order Limits

- 6.1.1 The Applicant has considered relevant airfields near the Order limits through **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]**. The assessment identified and modelled general aviation aerodromes within 15 km of the Scheme, including Seething Airfield, Long Stratton Airfield, Hardwick Airfield, Topcroft Farm Airfield, Nut Tree Farm Airfield and Tibenham Airfield. The assessment considered runway approach paths and final sections of visual circuits and concluded that, while solar reflections are geometrically possible towards a number of aviation receptors, the effects could potentially be operationally accommodated, subject to consultation with the relevant aerodromes.
- 6.1.2 In respect of Tibenham Airfield, the Applicant has also submitted the **High Level Investigative Report [APP-222]**, which assesses EFATO, GLF, thermal updrafts, turbulence and wind shear. The report concludes that no significant impacts are predicted in respect of these matters. The Applicant therefore considers that airfields near the Order limits have been appropriately assessed through the submitted application documents and that no additional aviation-specific mitigation is required on the basis of the assessments undertaken.

6.2 Civil and military flight paths

- 6.2.1 The Applicant's approach to civil flight paths has been to assess the aviation receptors most likely to be affected by the Scheme, including runway approach paths and final sections of visual circuits for identified nearby aerodromes. This assessment is set out in **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]**, which considered potential solar reflections from fixed and single-axis tracking panels. The assessment identified instances of potential "yellow" glare, meaning glare with the potential to cause temporary after-image, but concluded that these could potentially be operationally accommodated, subject to consultation with the relevant aerodromes.
- 6.2.2 No specific military flight path effects have been identified. The submitted aviation assessments focus on nearby civil general aviation receptors and Tibenham Airfield. The Applicant will consider any further evidence or representations from relevant aviation operators or authorities during the Examination and will update the SoCGs or provide relevant assessments if any additional civil or military flight path matters are identified.

6.3 Cumulative effects

- 6.3.1 Cumulative aviation effects have been considered within **ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]**. The assessment considered whether cumulative glare from the Scheme and the existing solar development at Tasburgh, located to the west of the Scheme, could affect assessed aviation receptors, including nearby general aviation aerodromes and Tibenham Airfield (operated by Norfolk Gliding Club).
- 6.3.2 For aviation receptors, the assessment concludes that cumulative glare from the proposed and existing solar developments is not predicted to exceed the geometric results already identified for assessed aerodromes. This is because the panel areas are located adjacent to each other and are not expected to create solar reflections at materially different times. As such, the cumulative aviation effect is not predicted to exceed the effects assessed for the Scheme alone.
- 6.3.3 No specific aviation-related cumulative effects with the Norwich to Tilbury project have been identified from the information currently before the Applicant. The East Pye Solar Scheme makes use of existing infrastructure to be relocated and the addition of a new pylon that is not considered to impact aviation activity in isolation. Therefore, a cumulative impact with the proposed Norwich to Tilbury project is not considered likely. The main aviation impact of the Norwich to Tilbury arises from the high-voltage pylons, which are separate from the main concern for the East Pye Solar Scheme (glint and glare).