



Application by East Pye Solar Ltd for an order granting development consent for the East Pye Solar project (EN0110014)

Post Hearing Submission ISH1

Interested Party Reference Number [REDACTED]

Aviation Safety

This matter was only very briefly addressed at the ISH1 Hearing – as only a few minutes were available before the end of the Hearing.

The GAAC briefly explained the serious risk to aviation safety that would be generated should the Application be successful and if the scheme layout were not changed.

On behalf of the Applicant, Mr Yates responded by referring to a number of the application documents. His response was to make reference to the Glint and Glare assessment. Not only can I confirm that Pager Power is not 'advisor' to the General Aviation Awareness Council but also that the Applicant's Glint and Glare assessment is flawed. The Norfolk Gliding Club's D1 submission addresses this.

Mr Yates also asserted that just because there is no Applicant document relating to engine failure or glider launch failure does not mean those matters have not been assessed. Again, as the Applicant's submissions are flawed (and there is no evidence of, or any acknowledgement that modifications to the scheme after October 2025 and , in particular , introduction of the BESS and two additional Substations have created additional threats to aviation safety. Norfolk Gliding Club's D1 submission addresses this in detail. It also addresses the comment by Mr Yates that there will not be '... a significant reduction in landing scenario.'

It was left that further comments could be made by DL1 and in the Applicant's response to PDA-006.

The additional comments that the General Aviation Awareness Council wishes to make at this point are to put the safety issues at Tibenham in context:

- a. Aviation in all of its forms is part of our essential infrastructure – military, cargo, emergency services, connectivity, travel, sport.
- b. Manifestly the safety of people in the air and on the ground is paramount and the aviation industry and aviation planning policy is steered and governed by safety requirements.



- c. Airfield safeguarding is the process by which airfield operators aim to ensure that the airspace around their airfield is safe for aircraft operations. The UK Civil Aviation Authority (CAA) states in Civil Aviation Publication (CAP), 'CAP 738'¹ that:
'The common aim of all safeguarding is to assess the implications of any development being proposed within the vicinity of an established aerodrome to ensure, as far as practicable, that the aerodrome and its surrounding airspace is not adversely impacted by the proposal, thus ensuring the continued safety of aircraft operating at the location.'

Airfield safeguarding ensures that appropriate procedures are in place when considering any development or change in activity close to an airfield. The 'Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction of 2002' states:

*'Operators of licensed aerodromes which are not officially safeguarded, **and operators of unlicensed aerodromes and sites of other aviation activities (for example gliding or parachuting)** should take steps to protect their locations from the effects of possible adverse development by establishing an agreed consultation procedure between themselves and the local planning authority or authorities'.*

Tibenham has done this.

- d. Aerodrome safeguarding at an unlicensed site such as Tibenham Airfield involves protecting against:
- Obstructions
 - An increase in wildlife risk
 - Potentially hazardous glint and glare from solar panels
 - Lighting confusion for pilots / inappropriately lit structures
 - Interference from construction (dust, smoke, wildlife attractants)
 - The risk of unacceptable building induced turbulence
 - Interference to any navigational aids from telecoms installations (e.g. 5G masts)
- e. Aviation safety is clearly addressed in EN-1 but the Applicant has not developed its proposals, '*collaboratively alongside*', Tibenham Aerodrome.
- f. Airfields such as Tibenham may be small and low key, but they train the people who run and operate the essential infrastructure. Gliding is highly skilled – and many people who start flying in gliders go on to become airline pilots. There is a huge shortage of pilots and other essential aviation staff at present and a need for safe training sites.

Tibenham offers not only flight training but a wide range of sport, recreation and business uses.

¹ [CAP 738: Safeguarding of Aerodromes \(caa.co.uk\)](https://www.caa.co.uk/publications/Pages/CAP738.aspx)



- g. In addition, the Applicant prepared a glint and glare assessment but this was generic and predicated on fixed wing flying. In particular, it did not address gliding activity which due to its nature is more likely to be impacted by glare from solar panels.
- h. The Applicant's 'High Level Investigative Report' APP-222 relating to Tibenham does not mention Seething Aerodrome and, the document relating to Seething, APP-223 does not refer to Tibenham. I have seen no explanation of why the methodology applied to the two aerodromes differs.
- i. Cumulative effects have not been considered, including the Station Road solar scheme and the National Grid pylons.