



East Pye Solar
Statement of Common Ground: Norfolk Gliding Club

Revision 1
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1 Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the application for a Development Consent Order (DCO) (the Application) for East Pye Solar (the Scheme) made by East Pye Solar Limited (the Applicant) to the Secretary of State for Energy Security and Net Zero (SoS) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 The Examining Authority has requested that the Applicant seek to agree an SoCG with Norfolk Gliding Club, as set out in Appendix F of the Rule 6 letter [PD-005].
- 1.1.3 This SoCG does not seek to replicate information which is available within the Application documents available on the Planning Inspectorate's website ([Documents | East Pye Solar](#)).
- 1.1.4 This SoCG has been produced to confirm to the Examining Authority (the ExA) where agreement has been reached between the parties and where agreement has not yet been reached.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by the Applicant and Norfolk Gliding Club (NGC). Collectively, the Applicant and NGC are referred to as the parties.

1.3 Purpose of this Document

- 1.3.1 The SoCG covers topics of the Application within the remit and of relevance to NGC.
- 1.3.2 This SoCG is a 'live' document and will be amended as the Examination progresses, including as more information becomes available and as a result of ongoing discussions between the parties to enable a final version to be submitted to the ExA.
- 1.3.3 The SoCG is intended to provide information for the Examination process, facilitate a smooth and efficient Examination, and manage the amount of material that needs to be submitted. For the purposes of Examination, this SoCG addresses key topic areas set out in **Table 1.1**. Each area of the topic has a unique reference which relate to the topic matter.

Table 1.1: Topic Referencing

Topic	Reference
Aviation	NGC TA

1.4 Terminology

- 1.4.1 This SoCG summarises the main topics covered and the status of the matter, as outlined in **Table 1.2**.

Table 1.2: Status of Matters

Colour Code	Status
	Agreed – indicates where an issue has been resolved.
	Under Discussion – indicates where points continue to be the subject of on-going discussions wherever possible to resolve, or refine, the extent of disagreement between the parties.
	Not Agreed - indicates a position where both parties have reached a final position that a matter cannot be agreed between them.

2 Scheme Description

- 2.1.1 The Scheme is a Nationally Significant Infrastructure Project (NSIP) for the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development including a Battery Energy Storage System (BESS), up to three 132kV Project Substations and up to three 400kV Project Substations, Grid Connection Infrastructure and a new National Grid Substation.
- 2.1.2 The **Location Plan [APP-005]** shows the Order Limits for the Scheme, which is 1,212.3 hectares of land within South Norfolk (the 'Order Limits').

3 Current Position between the Applicant, and Norfolk Gliding Club

3.1 Matters of Discussion

- 3.1.1 The following tables set out the position of the parties by topics, identifying matters agreed, under discussion, or not agreed between the Applicant and NGC at the point of this document being published.

3.2 Tibenham Airfield

Table 3.1: Norfolk Gliding Club – Tibenham Airfield

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant Position	Status
NGC TA-1	Engagement and consultation with Tibenham Airfield	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC considers that there was no meaningful collaboration during the design process and insufficient engagement with the aerodrome operator thereafter. NGC states that engagement only occurred following its own requests and that concerns regarding aviation safety were not proactively addressed. The Glint and Glare assessment carried out by the Applicant's consultant, Pager Power (PP), was published by them in March 2024, six months before they made contact with NGC to understand our flight operations. NGC state that there was no consultation following the design. After the initial contact by PP in October 2024 there were a number of emails between NGC and PP ostensibly to help with the preparation of a Glint and Glare study. Despite the clear and unambiguous guidance contained in NPS EN1, the NPPF, the contents of other national planning policy and guidance and that from various aviation bodies, at no point has the Applicant engaged with NGC with the aim of understanding and proactively mitigating the effects of its proposals on NGC in a meaningful way.	The Applicant has engaged with Norfolk Gliding Club (NGC) as set out at Table 18.6 of ES Volume 1 Chapter 18 - Other Environmental Matters [APP-054], to understand the specific operations and request information from NGC to inform technical assessments presented in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-026 to AS-029] and the High Level Investigative Report [APP-222]. The assessments have been undertaken in accordance with the available guidance, industry best practices, an assessment methodology employed on other NSIP and DCOs, as well as information provided by Norfolk Gliding Club. The determined impact upon Norfolk Gliding Club activities are based on geometric modelling results, recognised assessment methodologies, established aviation guidance, and professional judgement. The Applicant has assessed concerns raised by NGC specifically in ES Volume 3, Appendix 18.1 – Glint and Glare Assessment (Part 1 – 5) [AS-026 to AS-029] and the High Level Investigative Report [APP-222]. The assessment concludes that the Scheme is not predicted to significantly affect their operations.	Under Discussion
NGC TA-2	Adequacy of aviation assessment and consideration of aerodrome operations – Glint and Glare	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC considers that the Applicant and its consultants (PP) did not properly understand mixed gliding and powered aircraft operations at Tibenham Airfield when undertaking assessments, and that aviation operational requirements have not been appropriately reflected within the assessment process. Two meetings have been held, both at the request of NGC, one in January 2025 and a second in February 2026 at which detail flight operations were provided to assist PP, who admitted to having no aviation experience, in producing a realistic Glint and Glare study. At the second meeting, PP acknowledged that they had taken the Glint and Glare study published in March 2024 from another airfield and changed the names. NGC state that they have not received the	The Applicant has met with the NGC to enable their consultant to geometrically model their operational activities. The assessments undertaken by the Applicant have been carried out by competent experts with experience in over 1,800 Glint and Glare and Aviation assessments across numerous projects, including NSIPs and DCOs, on a national and international scale. The technical assessments and conclusions have considered industry best practices informed by pilots and published guidance. A High Level Investigative Report [APP-222], specifically for Norfolk Gliding Club, had	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant Position	Status
			revised assessment (which the Applicant said they would provide) as of May 2026. NGC disputes the conclusions of the glint and glare assessment, considers the assessment has not been appropriately informed by site-specific operational information, and remains concerned that glare effects could affect pilots' ability to maintain visual awareness of other aircraft.	been published by the Applicant when the application was submitted in March 2026 and published on the Planning Inspectorate website on 2 April 2026. The Applicant has assessed the glint and glare impacts specifically for Norfolk Gliding Club ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026 to AS-029] and a Glint and Glare Addendum - Norfolk Gliding Club. The assessments consider instances of significant glare relative to a pilot's position and the field of view of reflecting panels. The addendum concludes that pilots are not predicted to be significantly impacted, and that mitigation can be implemented by technical design if required.	
NGC TA-3	Tibenham Airfield - Operational Safety (aerotow launches)	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC considers that the proposal would compromise the operational safety of the club. Site 1 of the Solar Farm is located on the extended centreline of the east-west runway at Tibenham Airfield, approximately 1.5 km from the runway threshold. NGC is concerned that this could adversely affect emergency scenarios, including aborted aerotow launches where both aircraft may require emergency landing locations.	The Applicant has assessed concerns relating to aborted aerotow launches (i.e. Glider Launch Failure (GLF)) for Norfolk Gliding Club within the High Level Investigative Report [APP-222] . The assessment concludes that the Scheme is not predicted to significantly reduce the available space for Engine Failure After Take-Off (EFATO) and GLF, based on the available guidance and best practice.	Under Discussion
NGC TA-4	Tibenham Airfield – Operational Safety (Engine Failure After Take-Off (EFATO))	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC considers that the proposal would compromise the operational safety of the club by reducing available emergency landing options during Engine Failure After Take-Off (EFATO) and similar emergency scenarios. NGC's position is that, in some circumstances, the presence of solar panels could constrain emergency landing opportunities and increase aviation safety risks.	The Applicant has assessed concerns pertaining to EFATO for Norfolk Gliding Club within the High Level Investigative Report [APP-222] . The assessment concludes that the Scheme is not predicted to significantly reduce the available space for EFATO based on the available guidance and best practice.	Under Discussion
NGC TA-6	Tibenham Airfield – Thermal Plume	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC is concerned that thermal plume effects generated by the solar development could affect local flying conditions and disrupt training and circuit operations at the airfield.	The Applicant has assessed the impacts of thermal plumes within the High Level Investigative Report [APP-222] . The assessment concludes that thermal plumes are not judged to cause a significant impact, considering the weak nature of thermals arising from wasted energy from solar panels and the expected vertical separation between pilots during circuits and the height of the solar panels.	Under Discussion
NGC TA-7	Tibenham Airfield – Increased bird strike	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]	NGC considers that solar panels may attract birds through the perceived "lake effect", potentially	It is considered likely that the Scheme will result in increased opportunity for nesting bird species; primarily, this will benefit passerine species	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant Position	Status
		High Level Investigative Report [APP-222]	increasing bird strike risk to aircraft operating from Tibenham Airfield.	associated with agricultural habitats (for example: yellowhammer <i>Emberiza citrinella</i>), which pose no significant risk regarding bird strike. No large open areas of wetland habitat or similar open habitat will be created that will attract flocks of gulls and wildfowl (Canada geese <i>Branta canadensis</i> for example) potentially representing a greater risk of bird strike and the Order Limits are not present within or in close proximity to areas of wetlands that support large congregations of waterbirds and there is little existing evidence to suggest that such species are attracted to solar arrays mounted on terrestrial habitats.	
NGC TA-8	Application of aviation guidance and best practice:	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC consider that all expert aviation guidance has been rejected. The Civil Aviation Authority (CAA), their Aerodrome Advisory Team (AAT), the Combined Aerodrome Safeguarding Team (CAST) and the General Aviation Awareness Council (GAAC) amongst others have all provided advice and guidance on the aviation safety risks associated with solar panel installations.	The Applicant has outlined the guidance considered in all technical assessments within ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026 to AS-029] and the High Level Investigative Report [APP-222] , which includes guidance published by the Civil Aviation Authority (CAA), the Airport Operators Association (AAT, now disbanded) and the Commercial Aviation Safety Team (CAST). The Applicant notes that guidance published by the General Aviation Awareness Council (GAAC) outlines guidance for the DCO process and engagement, and not specific technical guidance.	Under Discussion
NGC TA-10	Tibenham Airfield - Mitigation	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029] High Level Investigative Report [APP-222]	NGC consider that there is an absence of any mitigation by East Pye. After a second meeting in February 2026, at the request of NGC, the East Pye Solar team (EPS) agreed they would consider mitigation but as May 2026, NGC do not consider that proposals have been provided to NGC for consideration.	The Applicant draws attention to the embedded design measures which have been incorporated into the Scheme, and to the technical conclusions of the assessments, which do not identify likely significant adverse effects on aviation activity at Tibenham Airfield that would necessitate further mitigation. 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). Measures to minimise glint and glare are secured through the Outline CEMP [APP-196] and the Outline OEMP [APP-197] , in accordance with Requirements 13 and 14 of the draft DCO [AS-032] .	Under Discussion
NGC TA-11	Tibenham Airfield – Agent of Change	ES Volume 3, Appendix 18.1 – Glint and Glare Assessment [AS-026] to [AS-029]	NGC considers that the Applicant has not demonstrated compliance with the Agent of Change	The Applicant notes this comment and reiterates that it has assessed the concerns pertaining to Norfolk Gliding Club within ES Volume 3, Appendix 18.1 –	Under Discussion

Reference	Matter Topic	Document Reference of Matters	Consultee Position	Applicant Position	Status
		High Level Investigative Report [APP-222]	principle and has not adequately addressed potential impacts on an existing aerodrome operation. NGC state that the Applicant has a responsibility for ensuring that its proposed infrastructure does not create new safety hazards for pre-existing airfields.	Glint and Glare Assessment [AS-026to AS-029] and the High Level Investigative Report [APP-222] .	

4 Signatories

4.1.1 The above SoCG is agreed between East Pye Solar Limited (the Applicant) and Norfolk Gliding Club, as specified below.

4.1.2 Duly authorised for and on behalf of East Pye Solar Limited.

Name:	
Job Title:	
Date:	
Signature:	

4.1.3 Duly authorised for and on behalf of Norfolk Gliding Club.

Name:	
Job Title:	
Date:	
Signature:	

Appendix A Record of Engagement

A.1.1 The parties have engaged throughout the pre-application stage, including technical meetings. In addition, the following stages of consultation has taken place:

- Non-statutory consultation ('Phase One' consultation) held between 23 October and 6 December 2024;
- Statutory consultation ('Phase Two' consultation) held between 18 June and 6 August 2025; and
- Targeted consultation held between 22 October and 26 November 2025.

A.1.2 A summary of meetings and key correspondence that have taken place between the parties in relation to the Application is provided in **Table A.1**.

Table A.1: Record of Engagement

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
Norfolk Gliding Club - Tibenham Airfield		
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

Date	Form of Correspondence	Key Topics Discussed and Key Outcomes
		receptors for the glint and glare assessment could not be confirmed by the airfield at this stage.
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.
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 in September.
7 Sep 2026	Email	Draft SoCG issued for review and discussion, with meetings proposed ahead of Deadline 1.
10 Sep 2026	Email	The Club confirmed its focus was on preparing its Written Representation for Deadline 1 and was content for the draft SoCG to be submitted with all matters recorded as "under discussion".
15 Sep 2026	Email	Further correspondence confirming that discussions would take place after Deadline 1 and that the SoCG would proceed on the basis that no agreement had yet been reached.
23 Sep 2026	Email	Follow-up seeking availability for a post-Deadline 1 SoCG meeting in early October.