

***Raydon Wings Aerodrome
Details Ltd
Woodlands Farm
Woodlands Road
Raydon IP7 5QD***

8 October 2025

Planning Inspectorate

By Email/Electronic Submission

Dear Sirs,

Norwich to Tilbury EN020027 - Planning Objection and Request to Register as an Interested Party

We write regarding the above referenced application for a Development Consent Order for the National Grid Norwich to Tilbury project.

At the outset, we wish to make clear that we are not ideologically opposed to the development of new energy infrastructure provided that the methodology used in determining such projects is adequately robust and follows both legislation and acknowledged best practice whilst, at the same time, causing the minimum loss of economic activity, amenity and bio-diversity.

Raydon Wings Aerodrome (RWA) is a long established general aviation aerodrome and has been serving all aspects of light aviation since 1997. RWA is also an important emergency diversion aerodrome for general aviation aircraft transiting up the east coast, being sufficiently large to easily accommodate most general aviation aircraft types and (at present) having no complicating geographical features or obstacles for pilots to contend with. RWA, in common with the majority of UK general aviation aerodromes, is not licensed by the CAA.

By way of explanation, the main difference between a licensed and an unlicensed aerodrome is that the CAA exercises a higher level of oversight and assurance at any licensed aerodrome in order to certify that the internationally agreed standards set out in ICAO Annex 14 are met. Because that oversight comes with a substantial cost, licensed aerodromes are typically those with a legal requirement to hold a licence in order to facilitate activities such as commercial air transport operations. To be sufficiently safe, an unlicensed aerodrome must meet most of the standards set by the UK CAA licensing regime. However, unlicensed aerodromes are not routinely inspected or audited by the CAA and cannot, therefore, be used by most transport category operators.

We took over the operation of RWA from its former proprietor in 2022. Due only to the manner in which the above referenced application has been progressed, we have since been forced to put all development plans on hold until the impacts of the above application can be fully understood. Given the lack of engagement by the Applicant, this has proven difficult. In addition to effectively closing the aerodrome to visiting traffic, we have been forced to turn down commercial approaches from flying schools, private aircraft owners and a gliding club because we cannot say with any certainty that we will remain in operation or

be in a position to safely support such activities. RWA is currently used as a relatively safe aerobatic practice area for air display pilots, but this activity along with gliding and parachuting would be completely untenable were this application to be approved due to the proximity of hazardous overhead power lines and a high voltage cable end sealing compound to be located just 175 metres from the runway side line. All commercial activity is, therefore, on hold since no investment or employment of staff can be justified until this matter is determined and the future viability of the aerodrome can be assured.

Our concerns with this Application are as follows:

1. The Applicant did not include the consideration of major disasters (including loss of life caused by aircraft accidents) in its Environmental Impact Assessment Scoping document. It did not, therefore, consider the potential effects of its proposals on general aviation or aviation safety and consequently, it failed to take this into account in designing its 'graduated swathe' as set out in its initial consultation documents.
2. It appears to us that the Applicant entirely failed to ascertain or take into account the location of general aviation aerodromes prior to designing and then publishing its 'graduated swathe', the route of which appears to have been determined primarily on grounds of cost.
3. The Applicant did not engage properly with RWA until contacted by us. It was left to us to engage with the Applicant having learned of the proposals through public engagement materials sent to local householders, following which the Applicant persistently failed to add us to its list of consultees, stating at one point that it had no obligation to send engagement material to local businesses.
4. An initial meeting with representatives of the Applicant eventually took place in July 2023 at Raydon Wings Aerodrome, which included representatives of the Applicant and the Applicant's aviation expert. The meeting, which was held on the aerodrome surface, lasted approximately 10 minutes.
5. A second meeting took place on 25th April 2024 during the course of a public open day organised by the Applicant and held in Brentwood, Essex. We experienced some difficulty in arranging that meeting as the Applicant cancelled various appointments at more local open days. During the meeting we gave the Applicant a copy of our aerodrome safeguarding map as lodged with the LPA and expressed our concerns regarding the proposals. The Applicant's aviation consultant dismissed our safeguarding plan, which it mistook for a zone of 'no development' as opposed to simply being the trigger for engagement by developers, that being the only purpose of such safeguarding maps.
6. At that meeting, the Applicant's aviation expert confidently stated that unlicensed aerodromes were not entitled to produce safeguarding maps and were not required to consider aerodrome safeguarding and therefore RWA had no inherent right to object to the Applicant's proposals on grounds of aerodrome safeguarding. It suggested that aircraft could simply manoeuvre around the proposed overhead lines without risk to safety of flight - an extraordinary position to adopt, but one that appears to have been employed along the entire route of the proposed development. We did not accept the Applicant's position. The CAA subsequently confirmed that the Applicant's position was incorrect and that unlicensed aerodromes must consider the local obstacle environment in the same manner

applied by any licensed aerodrome, a point that has since seemingly been accepted by the Applicant in spirit if not in practice.

7. As we pointed out to the Applicant and its aviation expert, the essence of this argument is entirely logical. An obstacle that presents a danger to aircraft using a licensed aerodrome (and is therefore prohibited) presents no less a danger to an aircraft simply because it is located at an unlicensed aerodrome. The laws of physics do not change with the aerodrome's licensing regime. Therefore, if the proposed overhead lines and cable end sealing compound would be judged to be unsafe at any licensed aerodrome, then they should be judged to be equally unsafe at an unlicensed aerodrome. Layered on to that assessment of safety, by reason of vertical extent, is the consideration of ground based infrastructure occupying space in the close vicinity of the runway that is currently empty - for instance in respect of parachuting or aerobatics which require a greater margin of error than flight by powered aircraft.
8. There was no further engagement or consultation with us at any point until the Targeted Consultation Suffolk 6 of early 2025, at which revised proposals were published. Regrettably, RWA was offered no opportunity to make an input to the formulation of the revised proposals. RWA's opinion was not sought despite the planned infrastructure coming within 175 metres of the runway edge and breaching CAA CAP 168/Annexe 14 obstacle safeguarding slopes. The Applicant seeks to suggest that the re-routing of the overhead line was made to accommodate RWA, but we understand that it was, in fact, due to its proximity to Grade 1 listed Wenham Castle which had evidently not been properly taken into account when designing the graduated swathe. Even if it were a change made in response to concerns expressed by RWA, it is astonishing that the Applicant did not consult with RWA in preparing any changes. Had it done so, it is likely that we would likely have quickly reached a workable compromise and we would have been able to drop any objection and agree a Statement of Common Ground. We say that it is still not too late to do so. It is the Applicant that has refused to do so.
9. During a video conference/meeting held on 29th April 2025 during the Targeted Consultation Suffolk 6, we suggested that the cable end sealing compound might be moved north of the disused railway line where the ground level is significantly lower and the impact on Raydon Wings Aerodrome might be reduced to a degree likely to be acceptable to us. Whilst that would not directly mitigate the penetration of the OLS slopes by the overhead lines, it would remove one potential hazard close to the runway edge. It became clear during that meeting that, in fact, no meaningful consultation with us was taking place. The decision as to the location of the cable end sealing compound had already been made based, we were told at that meeting, upon the ecology and geology reports commissioned by the Applicant. We were expressly informed that no further changes would be contemplated, raising questions as to the purpose of the Targeted Consultation. We expressed our surprise and disappointment that the Applicant had not consulted us in any way regarding the proposed changes and that the ecology and geology considerations appeared to take a higher priority than aviation safety which, yet again, had not been properly considered or considered at all.
10. Again, it appears that the Applicant relied heavily upon the advice of its aviation consultant which, holding itself out as an expert in the field, ought reasonably to understand that the assessment of risk will largely depend upon the range of activities envisaged at an aerodrome. For instance, gliding, parachuting and

aerobatic activities might, for obvious reasons, necessitate a more limiting local obstacle environment.

11. NPS EN1 5.5.16 states that, *“The CAA makes clear that the responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator”*. The Applicant’s aviation expert is not qualified to make such assessments and in any case, the activities that are planned at any aerodrome (of which the Applicant’s expert has no prevision because it has not enquired) heavily influence an aerodrome’s tolerance of local obstacles.
12. We are further concerned that in the Applicant’s Review of Aviation Impact (Table A15.2.9 Raydon Wings Aerodrome Impact), the Applicant accepts that its proposal does not meet normal CAP168 aerodrome safeguarding standards in respect of the penetration of safeguarded slopes by the overhead lines. The Applicant suggests that this penetration is acceptable but has not sought our opinion in this regard and for the reasons already stated, cannot make this assessment.
13. The National Policy Statement for Energy - EN1 (NPS EN1) 5.5.53 states that *“Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate”*. We say that the Applicant has made no meaningful attempt to engage or to develop realistic mitigations in cooperation with us. It has evidently preferred to rely upon the erroneous and unqualified advice given by its aviation expert.
14. The Applicant further suggests that Raydon Wings Aerodrome *“has not confirmed that the proposed Project is acceptable and continues to propose changes to the location of the CSE compound”*. Whilst this is in part correct, what the Applicant should say is that we have strongly objected to the proposed development on grounds of safeguarding and on grounds of the limitations on future use of the aerodrome that these proposals impose (IE no parachuting, aerobatics or gliding activity due to the proximity of the lines and the location of the CSE compound). We have formed the strong impression that, backed by a strong political wind, the Applicant prefers to take its chances with the Planning Inspectorate than to work to reach a mutually acceptable resolution with us.
15. The Applicant seeks to suggest that it ‘continues’ its engagement with us in order to work with us to minimise construction impact on the aerodrome which will be adversely affected for an extended period because the underground cables will intersect the runway requiring its closure and excavation. In its Impact Review, the Applicant appears to conflate this offer of ongoing engagement with previous discourse, presumably in order to give the impression that it has hitherto behaved reasonably and that, somehow, RWA has failed to engage adequately or completely with the Applicant. This is a terrible distortion of the facts and is typical of the overbearing and high-handed manner in which we (and many other aviation stakeholders) have been treated by the Applicant, itself aided, abetted and counselled by its aviation expert. From the outset, our concerns have been belittled or dismissed and the advice given to the Applicant by its aviation consultant has been judged, by the Civil Aviation Authority CAST team to be materially incorrect.
16. Throughout the process, the Applicant has attempted to cover up its failure to follow the correct process of engagement and consultation with aviation stakeholders by attempting to rewrite history. We have been unable to agree to the Applicant’s draft

of a Statement of Common Ground only because the Applicant seeks, in the preamble, to re-write the basic facts and chronology surrounding its failure to engage with RWA.

17. The Applicant's proposals will give rise to a breach of the policies set out in NPS EN1 because the existing and future use of RWA will be adversely affected to an existential degree by the proposed development, all of which might be avoided by a few relatively simple modifications to the proposed scheme. NPS EN1 states at 5.5.5 that, *"It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure"*.
18. We have been clear with the Applicant that we have no ideological objection to its proposals and that we recognise that, as per NPS EN1 5.5.50 *"It is incumbent on operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures."* However, to give effect to this, the Applicant will need to engage and cooperate with us as opposed to simply publishing its proposals in isolation and the refusing point blank to discuss changes or compromise.
19. NPS EN1 5.5.50 also states that, *"In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes..."*. We say that because the Applicant has failed to properly engage with us or to accommodate even small changes in order to reach a workable compromise, the Secretary of State cannot be assured that this requirement has been met. We say that it has not been met.
20. On a wider point, we wish to suggest that the Applicant has not followed Gunning Principles throughout this process. It effectively produced a pre-determined route in the form of a 'graduated swathe' that, by its nature, had very little room for meaningful adjustment. No potential stakeholders were aware of this project until the first public engagement and no opportunity to influence the path of the graduated swathe was provided to stakeholders. Even then, many members of the public believed that the engagement by the Applicant related to the Bramford to Twinstead reinforcement. Judging by the Applicant's own documentation, the location of the graduated swathe appears to be based primarily on consideration of cost rather than a proper detailed evaluation of the options available and their socio-economic benefits. In making subsequent changes to its proposals, the Applicant did not follow the guidance set out in NPS EN1 and consequently it has failed to behave according to Gunning Principles.
21. With respect to the Bramford to Twinstead overhead line reinforcement, in the immediate area of Raydon Wings Aerodrome, the new overhead line (a separate project) must be considered to contribute to a cumulative impact affecting RWA and, indeed, affecting all local stakeholders. It appears to us that the Applicant has taken no account of this potential impact which will affect all those located in a triangle formed by Bramford, Hadleigh and Holton St Mary. In the area of Raydon Wings Aerodrome, the proposed overhead lines lie close together and even at the point where the proposed CSE compound is located, they will lie less than a mile apart. Given that the two projects are running almost concurrently, we question why cumulative impact has not been considered or featured in the consultation

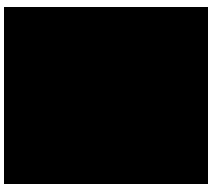
material of either project. The lack of cross referencing has caused a good deal of local confusion to the local populace.

On the above grounds, we wish to object to the proposal as presented.

In view of the limited and flawed engagement with aviation stakeholders that has been evident in the preparation of this application, **we also wish to join the General Aviation Awareness Council in asking that the matter of the safety of general aviation airfield activities is identified as a Principal Issue** such that the Examination can better assess the potential safety impacts associated with this application can be properly assessed.

We hereby apply to make our representation in person at the Examination as an interested party.

Yours faithfully,

A solid black rectangular box used to redact the signature of William Curtis.

William Curtis
Managing Director & Accountable Manager

Application by National Grid Electricity Transmission (NGET) for an Order Granting Development Consent for the Norwich to Tilbury Project

Raydon Wings Aerodrome - Interested Party Ref: [REDACTED]

Main Grounds of Objection

1. In scoping its Environmental Impact Assessment, the Applicant did not consider the possibility of a major disaster including loss of life resulting from its application. Accordingly, this possibility was never adequately addressed and remains unaddressed.
2. When creating its initial 'graduated swathe', the Applicant took no account of General Aviation (GA) aerodromes proximate to the proposed route to be taken by the overhead line.
3. There was no engagement with GA aerodromes or aircraft operators in order to identify potential hazards (HAZID) prior to publishing the graduated swathe.
4. The Applicant failed to engage with Raydon Wings Aerodrome (RWA) until it received a response from us to its initial public engagement. Further, we say that the Applicant has failed to engage meaningfully and in good faith at any point.
5. Following the initial engagement, the Applicant suggests that it re-routed the overhead line as a result of our objection to its location some 700 metres from the runway threshold (but we understand that this in fact resulted from its location close to a Grade 1 listed building).
6. The Applicant moved the overhead line and cable end sealing compound to a location less than 300 metres from the runway sideline. At no point was the feasibility or practicality of this change discussed with RWA.
7. The proposal was presented as a 'fait accompli' during an online meeting held on 29th April 2025 which formed a part of the Suffolk 6 Targeted Consultation.
8. At this meeting, which was supposed to be a consultation regarding the proposals and therefore a test of its proposals, our suggestion that the Cable End Sealing Compound should be moved a few metres north was rebuffed on the basis that the geological and ecology reports supported the chosen site. We were informed that this decision would not be reviewed or changed under any circumstances. This raised the question as to what the purpose of the consultation meeting actually was.

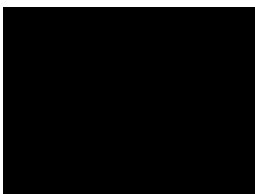
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9. The Applicant accepts that its proposal does not meet normal CAP168 aerodrome safeguarding standards in respect of the penetration of safeguarded slopes by the proposed overhead lines. The Applicant suggests that this penetration is acceptable but has not sought our opinion in this regard and for the reasons already stated, cannot make this assessment.
 10. NPS EN1 5.5.16 states that, *“The CAA makes clear that the responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator”*. The Applicant’s aviation expert is simply not qualified to make such assessments and in any case, the activities that are planned at any aerodrome (of which the Applicant’s expert has no provision because it has not taken the time to enquire) heavily influence an aerodrome’s tolerance of local obstacles.
 11. The National Policy Statement for Energy - EN1 (NPS EN1) 5.5.53 states that *“Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate”*. We say that the Applicant has made no meaningful attempt to engage or to develop realistic mitigations in cooperation with us. It has evidently preferred to rely upon the erroneous advice given by its aviation expert.
 12. The Applicant suggests that Raydon Wings Aerodrome *“has not confirmed that the proposed Project is acceptable and continues to propose changes to the location of the CSE compound”*. Whilst this is in part correct, what the Applicant should say is that we have strongly objected to the proposed development on grounds of safeguarding and on grounds of the limitations on future use of the aerodrome that these proposals impose (i.e. no parachuting, aerobatics or gliding activity due to the proximity of the lines and the location of the CSE compound). We have formed the strong impression that, backed by a strong political wind, the Applicant prefers to take its chances with the Planning Inspectorate than to work to reach a mutually acceptable resolution with us.
 13. We say that had the Applicant engaged with us to any reasonable or meaningful extent, it would have been relatively simple to agree a routing that would have minimised impact on RWA whilst, at the same time, securing the Applicant’s objectives.
 14. The Applicant’s proposals will give rise to a breach of the policies set out in NPS EN1 because the existing and future use of RWA will be adversely affected to an existential degree by the proposed development, all of which might be avoided by a few relatively simple modifications to the proposed scheme. NPS EN1 states at 5.5.5 that, *“It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure”*.
 15. We have been clear with the Applicant that we have no ideological objection to its proposals and that we recognise that, as per NPS EN1 5.5.50 *“It is incumbent on operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.”* However, to give effect to this,

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the Applicant will need to engage and cooperate with us as opposed to simply publishing its proposals in isolation and the refusing point blank to discuss changes or compromise.

16. NPS EN1 5.5.50 also states that, *“In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes...”*. We say that because the Applicant has failed to properly engage with us or to accommodate even small changes in order to reach a workable compromise, the Secretary of State cannot be assured that this requirement has been met. We say that it has not been met.
17. We believe that the Applicant, determining that it has a favourable political wind behind it, has quite deliberately and as a matter of policy taken little or no account of General Aviation activity along and adjacent to the proposed route preferring, instead, to take its chances with the Planning Inspectorate and the Secretary of State. It is otherwise difficult to see how so little meaningful engagement could have taken place. Instead, in substitution, too much reliance has been placed upon the (unqualified) opinions of an aviation expert in the pay of the Applicant, presumably with the aim of suggesting that the Applicant has properly considered aviation risks and impact. We say that this approach has not been effective and has not fulfilled the Applicant’s obligations to engage and consult with General Aviation stakeholders.
18. We ask the Inspector either to reject the application on the grounds that due process has not been followed or, alternatively, to instruct the Applicant to engage with us properly (along with other applicable GA aerodromes) in order to properly undertake the mitigation work that it should reasonably have carried out during the pre-application process with the aim of reaching agreement with us regarding an acceptable accommodation over the location of the Cable End Sealing Compound and to discuss possible mitigations relating to the proposed route of the overhead line (which agreement would not be unreasonably withheld).

For and on behalf of Raydon Wings Aerodrome



William Curtis
Director, Details Limited, Aerodrome Operator, Accountable Manager