



Norwich to Tilbury National Grid: AENC-ARC-ENV-REP-0176

Summary: RR [REDACTED]

The GAAC, is an IP, on behalf of General Aviation (GA) Aerodromes adversely impacted by the NG scheme. It does not oppose the principle, but proposed route alignment adversely affects GA Aerodromes.

The CAA Airfield Advisory Team (AAT) was involved until 2025, advising NG on the impact of proposals on established aerodromes. It was disbanded but the CAA's GA unit does not seek to retract or repudiate any of its work. The CAA Combined Aerodrome Safeguarding Team (CAST) issues advice highlighting the need to take account of the safety of GA aerodromes.

GA airfields, a national asset, should be taken into account in infrastructure projects.

GAAC endorses representations by Chase Farm, Priory Farm, Raydon Wings and Tibenham aerodromes.

This addresses ES Chapter 15 and Volume 6 Appendix 15.2

A Document 6.15 ES Chapter 15 – Socio-economics, Recreation and Tourism

B Document: 6.15.A2 ES Appendix 15.2 Review of Aviation Impact

(This addresses 15.1 – 15.3. 15.4 – Aviation Assessment - is addressed by the operators)

A Document 6.15 ES Chapter 15 – Socio-economics, Recreation and Tourism

1. The 'Review of Aviation Impact' is flawed, due to interpretation, failure to apply national policy, aviation regulation, the scope of assessment and ALARP principle.
2. Chapter 15 addresses aerodromes where the promoter considers 'likely significant effects'. Therefore, it only addresses Raydon Wings and Chase Farm.
3. It concludes only Chase Farm would be subject significant adverse effects – '*as closure is anticipated*'. However, the route could have been modified. This is post-hoc justification for flawed route definition. It also suggests 'temporary' closure of Raydon Wings would take place (duration not identified). It admits it has no detailed information about the operations but concludes impact is, '*temporary, short-term, minor adverse and not significant.*'
4. The proposed development introduces major changes to airfield approaches and may deter some users (or all in some weather conditions). Flying activities – aircraft types, training and competitions - may be compromised. Changes will have negative effects on visitors and income. The recreational value of aerodromes may be compromised, affecting not just pilots but local communities. These factors have not been taken into account.
5. The ES has not properly addressed the socio-economic, recreation and tourism impacts of the proposed development.

B. Document: 6.15.A2 ES Appendix 15.2 Review of Aviation Impact

15.1 Introduction

1. Paragraph 15.1.1 refers to a 'review' of aviation impacts, implicitly accepting the development **does** have 'impacts' on aviation – including safety, nature, range and scale of operations, planned development and future opportunities.
2. Paragraph 15.1.2 refers '*the findings of Alan Stratford and Associates*' (ASA). No detail is provided. The 'findings' are an inadequate evaluation of aviation impacts.

15.2 Planning Policy and Regulatory Context

1. National Planning Policy

- 1.1 The applicant's reference (15.2.6) to EN-1 is appropriate but has not been followed. Consultation with airfields was superficial, did not address operational or cumulative effects, or propose mitigation.
- 1.2 At 15.2.8 the Applicant refers to paragraph 5.5.50 of EN-1 which states:
'...the SoS should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes, and that realistically achievable mitigation is carried out ...'
- 1.3 However, the route was identified with no attention to the existence or proximity of airfields. No change has been made. The provisions of EN-1 have not been followed.
- 1.4 EN-1 notes the CAA requires licensed aerodromes have safeguarding arrangements in place but recommends that **all aerodrome operators** should take steps to protect their aerodrome from effects of development. ASA has **not** applied this, consistently arguing CAA protection extends **only** to licenced aerodromes. Furthermore, ASA rejects any case for safeguarding principles to be varied for specific aerodrome operations or location. Therefore, EN-1 has not complied with.
- 1.5 The scheme was not designed to '*minimise adverse impacts*'.
- 1.6 There was no mention of aviation in the 2022 route selection report. One aerodrome is mentioned – Stow Maries - but for historic value and listed status.
- 1.7 Paragraph 15.2.9 notes that EN-1 places an obligation on aerodrome operators to agree reasonable changes to operating procedures. This is sound but the applicant must demonstrate '*... necessity, acceptability and reasonableness*' which was not done.
- 1.8 If initial route selection had been properly undertaken, small modifications would have avoided adverse impacts on aerodromes and avoided, or at least substantially reduced, time and cost now being incurred.

- 1.9 15.2.10 refers to mitigation with the overarching purpose of avoiding economic loss, harm to training and safety risks. However, this was not done. Its appraisal of safety risks is not comprehensive; engagement with aviation operators has been poor.
- 1.10 The Applicant's lack of consideration of the issues set out in paragraphs 15.2.6 – 15.2.10 may derive from failure to address planning policy and misinterpretation of the provisions of the ANO.

2 National Planning Policy Framework (NPPF)

- 2.1 The Applicant has not considered NPPF paragraph 111 to maintain a national network of GA aerodromes based on economic value, leisure, training and emergency service needs.
- 2.2 Affected aerodromes are businesses with rigorous operational and safety requirements. Their current and potential value – in monetary, recreational, business, training and emergency activity terms has not been addressed.
- 2.3 The NPPF recognises the importance of general aviation aerodromes for sport. Sport England recognises all flying activities as '**sports**'. This means that aerodromes are **sports venues** with NPPF protection as set out in paragraphs 88 and 96, 98, 103 and 104. Furthermore, paragraph 200, makes clear that the existence of a community facility / sports venue takes precedence over a new development (applied to airfields by PPG Paragraph: 014 Reference ID: 30-014-20190722).
- 2.4 The value and function of established general aviation businesses and community facilities have not been adequately taken into account in NG's scheme design, contrary to the provisions of the NPPF.

3 Aviation Regulation

- 3.1 Paragraph 15.2.14 of the Applicant's document is an incorrect interpretation of the ANO. It states: '*...not directly relevant as no certified aerodromes have been identified within the scope for assessment....*' This is incorrect - ANO 2016 Article 240 applies to **any** aerodrome. It states:

'Endangering safety of an aircraft

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

- 3.2 Article 265 defines offences and penalties for contravention.
- 3.3 There is little in the documents about maintenance of the scheme. NG's website refers to drones 'revolutionizing maintenance' which would create an added threat to aviation safety.

4 CAP 738: Safeguarding of Aerodromes

- 4.1 The Applicant correctly states that CAP 738 (paragraph 1) provides advice and guidance to *'...certified, licensed and non-licensed aerodromes...'* Paragraph 7 of CAP 738 also states that whilst it considers the aerodrome operator of certificated and licensed sites to hold expert opinion on safeguarding their site, it does not *'...hold a view on safeguarding at non-licensed sites.'*
- 4.2 However, other advice is relevant. In particular, the T&CP (Safeguarded Aerodromes, etc) Direction 2002 Annex 1 – Circular 1/2003 states:
- 'Operators of licensed aerodromes which are not officially safeguarded, and operators of unlicensed aerodromes and sites for other aviation activities (for example gliding or parachuting) should take steps to protect their locations from the effects of possible adverse development ...'*
- 4.3 CAST publication GA1: 'Safeguarding Guidance to GA...' states *'Whilst, ..., it is not a requirement for an unlicensed aerodrome to have a safeguarding arrangement it is a very good idea to do so.'*
- 4.4 All unlicensed aerodromes should maintain a safe operating environment. To be sufficiently safe, an unlicensed aerodrome must meet most of the standards set by the CAA licensing regime.

5 CAP 793: Safe Operating Practices at Unlicensed Aerodromes

- 5.1 CAP 793 is referred to in paragraph 15.2.18. The Applicant has not articulated its relevance. Prior to 2010, all flying training had to be undertaken at licenced aerodromes. The Applicant erroneously implies unlicensed aerodromes are less important and less worthy of safeguarding protection.
- 5.2 Chapter 1 paragraph 2 of CAP 793 refers to the 'sound practice' of safeguarding and paragraph 4 states, *'...where flying training is taking place additional safety margins should be considered.'* Paragraph 9 also states, *'This publication is written primarily to cover unlicensed aerodromes used by aeroplanes. Less demanding criteria may apply to aerodromes solely used by helicopters, gyroplanes or microlights.'* Paragraph 8 states: *'The fact that an aerodrome is unlicensed does not preclude compliance with the ANO or the Rules of the Air Regulations.'*
- 5.3 Chapter 2, paragraph 3.2 confirms HM Government advises that aerodrome owners should take steps to safeguard their operations.
- 5.4 Paragraph 5.1 goes on to address obstacles, stating, *'Anything that, because of its height or position, could be a hazard to an aircraft landing or taking off should be conspicuously*

marked if it cannot be practicably removed or minimised.’ This proposed obstacle is not capable of being removed or minimised and, in an emergency, marking is not mitigation.

- 5.5 The specific circumstances at Tibenham Aerodrome underline the failure adequately to take account of the provisions of CAP 793. Paragraph 15.2.18 acknowledges the CAP793 requirement to have no obstacle of 150 ft within 2000 m of a runway mid-point (a climb gradient of 2.286%). The proposed pylons are 2300m from the centre of Tibenham’s runway 26 but are a continuous obstacle of at least 180ft (a climb gradient of 2.385% which is 4% greater than that implied by CAP793).

15.3 Scope of the Assessment

1. EN-1 (15.3.1 of the Applicant’s document) makes no distinction between the safety of different ‘categories’ of aerodrome. It includes the following:

- 5.5.1: *‘All aerodromes can be affected by new energy development.’*
- 5.5.2: *‘Collaboration and co-existence between aviation, ... and energy industry stakeholders should be strived for ... such that neither is unduly compromised.’*
- 5.5.5: *‘UK airspace is important for ... civilian ... aviation interests. 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’*
- 5.5.14: *‘The DfT/ODPM Circular 01/2003196 and CAA guidance also recommends that the operators of aerodromes which are not officially safeguarded should take steps to protect their aerodrome from the possible effects of development’*
- 5.5.50: *‘..., 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....’*

2. The Applicant has not taken account of the salient issues set out above. The method of assessment set out in 5.3.4 – 5.3.35 is flawed. The conclusions in 5.4 are not supported.

3. There is no mention of ALARP principles. Paragraph 5 of CAP 738 states:

‘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.’

4. CAP 738, paragraph 3.2 requires the aerodrome operator to assess the risks:

*‘as a **minimum**: any development or change in land use in the aerodrome area;’*

5. CAP 760 confirms how assessment and mitigation of risk is to be managed. It was prepared to *'...enhance safety regulation and potentially enhances safety performance...'* It defines 'ALARP' as:

'A risk is low enough that attempting to make it lower, or the cost of assessing the improvement gained in an attempted risk reduction, would actually be more costly than any cost likely to come from the risk itself.'
6. The cost of risk generated by the proposed development is high. In its EIA Scoping the Applicant has not addressed tolerability or considered major disasters (including loss of life caused by aircraft accidents).
7. The NPPF definition of **general aviation airfields** is *'Licenced or unlicensed aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.'* It makes no distinction between licensed or unlicensed.
8. Paragraph 15.3.6 notes the consultant's 'professional judgement' originally applied a 2km radius for its assessment. Paragraph 15.3.7, explains the advice of the CAA, to extend to a 5km radius.
9. The CAA does not define an 'acceptable' obstacle clearance. The aerodrome operator is the expert responsible for ensuring ongoing safety of the airfield and its surroundings.
10. There is no foundation for assertions in paragraphs 15.3.28/36 that an obstacle clearance height of 100 ft is acceptable. The rules of the air state a 500ft clearance is required (save for take-off and landing).
11. Paragraph 15.3.38 acknowledges *'...overhead line may not be fully visible over the nose of an aircraft on take-off and approach...'* whilst proposing no measures to change this. Paragraph 15.3.50 makes reference to marker balls but no proposal for their use. In any case, marking is irrelevant in an emergency – such as engine failure on take-off.

Conclusion

Aviation has not been properly or adequately addressed. Threats to safety and viability could be resolved through scheme amendments. This could have been avoided if addressed at project definition. Aviation is important in East Anglia, fully recognised in national aviation policy. Safety is paramount. The Aerodrome Operator is the expert responsible for ensuring ongoing safety.



Appendices to full representation

1. CAA Airfield Advisory Team; UK Civil Aviation Authority Professional Services Group
Letter of 20 March 2025
2. CAA CAST Advice Note 1
3. GA2 CAST Aerodrome Safeguarding Guidance Note
4. GA5 CAST Aerodrome Safeguarding Alert

