

Response to EXQ1

General Aviation Awareness Council Relevant Representation Reference Number [REDACTED]

GEN 1.6

We respond as an IP.

The principle that this scheme is of Critical National Priority (CNP) is accepted.

We agree that for projects which qualify as CNP, it is 'likely' that the need case 'may' outweigh the residual effects. However, paragraph 4.1.7 of EN-1 states a clear exemption from this presumption:

'This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats...'

Paragraph 4.2.10 makes clear that the applicant must

'...show how their application meets the requirements in this NPS...'

EN-1 places great weight on the role of aviation. It states:

'5.5.1 All aerodromes, covering civil and military activities, as well as aviation technical sites, meteorological radars and other types of defence interests (both onshore and offshore) can be affected by new energy development.'

'5.5.7, ...It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, manned and unmanned air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure.'

National Grid defined the scheme, imposing the route on the aerodromes and the collaboration referred to in paragraph 5.5.7 did not occur. From the first stages of the definition of this project, in 2022, it has been clear that the scheme is principally focussed around the engineering design.

Aviation safety was not addressed at the commencement of the project. The initial route evaluation process took no account of the presence of General Aviation Aerodromes within the route corridor.

There was only one reference to one airfield in the preliminary routing report. This related to Stow Maries airfield – but not in relation to aviation operations – rather in respect of its listed heritage value as a WW1 Aerodrome.

The Applicant's Planning Statement, APP-085, at paragraphs 2.4.30 and 2.4.31 introduces the Holford and Horlock Rules, which focus on engineering scheme design. It then applies

these rules, frequently quoting them as an important factor driving scheme design. Paragraph 6.1.69 of APP-085 refers to the Holford and Horlock rules ‘alongside an iterative design approach informed by the EIA’.

The GAAC is aware of one scheme modification relating to Thurrock Airfield where it was recognised (in 2025) that adjustments to pylon height would be needed.

The GAAC is unaware of any other ‘iterative design approach’ relating to airfields. No ‘alternatives’ to address the concerns of aerodromes were discussed.

Aviation was not addressed until after the route was determined and design was well advanced. The scheme has been driven by engineering design and other material considerations have not been accorded adequate weight.

In respect of the ‘mitigation hierarchy’ which is defined in EN-1 as:

‘A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.’

Aviation impacts have not properly addressed or mitigated. There has been no attempt at Tibenham, Priory Farm, Raydon Wings, or at Chase Farm to ‘avoid, reduce, mitigate or compensate’.

The Applicant’s ‘Review of Aviation Impact’, App-267, sets out a series of ‘Specific Aerodrome Assessment Conclusions’. For each affected aerodrome it sets out some factual information and some generated performance data. We comment as follows:

- The methodology applied to determine the criteria has not been explained or described.
- There is an implicit assumption that unlicensed aerodromes are of less importance than those licenced by the CAA. This position was clearly expressed by National Grid and its aviation advisors in a small number of short meetings
- The site specific activities, environment and geographic location have not been considered.
- The CAA Airfield Advisory Team (AAT) advised National Grid in March 2025:

‘From our earliest engagement, we have provided signal that when considering proposed power line routing, it is not the aircraft performance envelope that is the limiting factor. Therefore, any intimation that a specific type can manoeuvre to avoid such vertical obstructions should be disregarded.’

- CAA advice to General Aviation Aerodromes has not been applied.

- The Civil Aviation Authority (CAA) considers the Aerodrome Operator of licensed aerodromes to hold the 'expert opinion'. It does not hold a view on unlicensed sites. However, the CAA Combined Aerodrome Safety Team (CAST) has issued publications applicable to all aerodromes, recommending that the provisions of CAP 738 are applied. It also recommends all aerodromes to lodge safeguarding plans with their local planning authority.

The aerodromes, Tibenham, Priory Farm, Raydon Wings, and Chase Farm are well established sites providing flying training, recreation and leisure activities. The operators of these aerodromes, as aviation experts with many years of experience, consider that the proximity of the pylon route, and ancillary infrastructure would cause material threats to aviation safety, in conflict with the provisions of EN-1.

The aerodrome operator, site safety officers, instructors, experienced aviators, all have intimate knowledge of their site. It is irrational not to treat those as having the same 'expert opinion' as defined in CAP 738. However, the CAA's CAP 793 does set out safe operating practices for unlicensed sites and this includes identification and risk management.

There is widespread misunderstanding, which has been applied by National Grid, that in some way, unlicensed aerodromes are less 'important' than licensed sites. The key difference between licensed and unlicensed site is:

- Training at an unlicensed site may only take place with a aircraft maximum take-off weight of 2730kg.

Flying instructors and aerodrome operators are responsible for safety and are the experts on their site, its surroundings and other proximate activity, constraints, microclimate and the skills of those operating from the site.

Therefore, the distinction is that, for larger aircraft, the site must be licenced with CAA overview. However, most flying training now takes place in microlight aircraft and does take place at unlicensed aerodromes.

The operators of unlicensed aerodromes must take as much care and responsibility for safety as those at licensed aerodromes.

The Air Navigation Order is applicable at all aerodromes. Article 240 of the Air Navigation Order (ANO) 2016 makes it a criminal offense to recklessly or negligently endanger an aircraft or any person therein.

In summary, aviation risk and safety was not addressed at the start of this project design. When National Grid started to address this in 2024, its position was that public safety at unlicensed aerodromes did not carry as much weight as at licensed sites. The affected aerodromes sought constructive engagement with National Grid to examine mitigation but this was not reciprocated.

Undoubtedly, additional risks to aviation safety arise from new tall structures, and in this case a continuous overhead cable, in close proximity to an aerodrome. The operators of the affected sites have articulated the specific risks that they identify. Such risk falls within the remit of EN-1 paragraph 4.1.7.

We do not consider that the need case outweighs residual effects. Residual effects could constitute an unacceptable risk to human health and public safety. The responsible people at each of the aerodromes affected present their own analysis of risk based on their operations and knowledge of their sites.

It is important here too to take account of the well-established 'As Low As Reasonably Possible', 'ALARP', principles, recognised by the Health and Safety Executive and the CAA. There is no evidence that National Grid has applied this principle to the design of this scheme.

The adverse aviation impacts inherent in the scheme under examination, could have been addressed at the early stages of scheme design and relatively minor adjustments to the route could have avoided the risks to aviation safety which this scheme generates.

In summary, this scheme is of Critical National Priority (CNP). However, the 'need' case does not outweigh unacceptable, negative, 'residual effects' constituting '*..unacceptable risk to ... human health and public safety*'. These effects have been clearly articulated by the affected aerodromes and must be taken into account, requiring modification to the scheme to remove unacceptable risk and interference to public safety.

GEN 1.20

The Applicant is asked to review the need for a SoCG with the General Aviation Awareness Council (GAAC) (an IP).

The GAAC acts to support representations of the affected aerodromes. They are the expert on the risk to safety and operations as their aerodromes.

The GAAC does not consider that a SoCG with the Applicant would provide significant assistance to the ExA. The salient result that the GAAC wishes to be made, is for National Grid to agree modifications with the affected aerodromes to achieve so as to avoid risks to aviation safety.