



**Norwich to Tilbury
ISH 2 28 April 2026
Written Post-Hearing Submission
Agenda Item 5: Aviation Safety**

**General Aviation Awareness Council
RF [REDACTED]**

1. Introduction

- 1.1 The General Aviation Awareness Council (GAAC) attended Issue specific hearing 2 (ISH2) on Tuesday 28 April to respond to the ExA's Item 5 questions relating to Aviation Safety.
- 1.2 In respect of this DCO the GAAC is particularly concerned about the impact of the scheme on four aerodromes – Chase Farm, Priors Farm, Raydon Wings and Tibenham.
- 1.3 This submission should be read in the context of the extensive policy information set out in our original Written Representation and our response to ExQ1.

2. Response to ISH 2 Day 1 Item 5

- 2.1 The GAAC does not dispute the critical national priority status of this scheme.
- 2.2 However, EN-1 specifically addresses human safety and aviation and we do dispute the Applicant's interpretation of those safety issues within it.. The key statements are set out below.
- 2.3 EN-1 paragraph 4.1.7, states '*...For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases.*' It goes on to say, '*This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and **public safety**...*'
- 2.4 Paragraph 4.2.3 refers to using '**smart and strategic planning**' to '**minimise impacts**'.
- 2.5 Paragraph 4.2.7 states that CNP policy '*...**does not** create an additional or cumulative need case or weighting...*'.
- 2.6 Paragraph 4.2.11 states that, '*Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.*'

- 2.7 Paragraph 4.2.14 states that the Secretary of State, ‘...*must be satisfied that the applicant’s assessment demonstrates that the requirements set out above have been met.*’
- 2.8 Paragraph 4.2.15, in addressing non-HRA and non-MCZ residual impacts, CNP infrastructure which creates ‘unacceptable risk’ to ‘human health and public safety’ is not able to claim that these residual impacts are acceptable.
- 2.9 It is also clear in EN-1 that paragraph 5.5.1 applies to ‘**All aerodromes... can be affected by new energy development**’. Paragraph 5.5.2 refers to ‘*Collaboration...*’ Paragraph 5.5.5 emphasises the importance of airspace use by civilian operations, and again refers to collaboration. It goes on to identify the important economic and social benefits of aerodromes.
- 2.10 The CAA makes clear that the responsibility for the safeguarding of general aviation aerodromes lies with the aerodrome operator – as set out in paragraph 5.5.16.
- 2.11 Paragraph 5.5.50 requires the Secretary of State to be satisfied that the proposal has been designed, **where possible**, to minimise adverse impact on the operation and safety of aerodromes.
- 2.12 Paragraph 5.5.59 states the Secretary of State should consider whether the proposed development would ‘...cause harm to aerodromes’ training...’.

3. Review of the Applicant’s adherence to EN-1

- 3.1 Despite EN-1 para 5.5.5 requiring collaborative development, the initial National Grid route made no reference to aviation or aerodromes. The presence and nature of aerodromes along the route was not taken into account for the first two years of the project being in the public domain. It is clear that the presence of aerodromes was not a consideration in route planning.
- 3.2 When National Grid appointed its aviation consultant, ASA, there were a number of cursory, high level on-line meetings and then some short visits to some aerodromes. ASA took the position that unlicensed aerodromes merited little attention, despite specific advice to the contrary by the CAA AAT.
- 3.3 At a late stage of project development, ASA undertook its simple assessments of the risk of aircraft accidents. It applied a fixed methodology which the CAA AAT had advised was inappropriate. There was no site-specific appraisal to identify specific local issues. In a small number of cases, brokered by the CAA Airfields Advisory Team, NG agreed to minor adjustments to the scheme which gave

adequate comfort to the aerodrome operator that there would not be serious adverse impacts on their site.

- 3.4 Essentially, ASA advised NG that unlicensed aerodromes were unimportant. There was no credible attempt by NG to properly appraise the site specific issues or the economic and social impacts of the pylon route and pylon height.
- 3.5 Based on ASA's approach, NG's position is that, effectively, safeguarding of an unlicensed aerodrome is immaterial. However, EN-1 includes all aerodromes.
- 3.6 NG has wrongly sought to differentiate between licensed and unlicensed. In addition, There has been a superficial and wholly inadequate assessment of the likelihood of accidents but experienced aviators and those with responsibility for aviation safety conclude that this assessment seriously underestimates this risk and its severity.
- 3.7 There should have been a tailored appraisal taking account of the nature of the flying activity, topography and context. The CAA letter of March 20 2025 set this out clearly.
- 3.8 With a different approach by NG at the start and ASA during project refinement, there could have been minor modifications to the route, potentially to pylon undergrounding or realignment. That would have been '**smart and strategic planning**' to '**minimise impacts**'.

4. ISH2

- 4.1 In the Hearing, the Applicant sought to argue that EN-1 applies only to licensed aerodromes. That is not correct. We accept that licensed aerodromes are subject to regular CAA Inspection due to the nature of their activities. However, the Air Navigation (Amendment) Order 2010, significantly changed UK aerodrome licensing by allowing flight training, testing, and examinations to occur at unlicensed aerodromes. This removed the requirement that all pilot training and tests be conducted from a licensed site. Due to the cost involved, many aerodromes chose to become unlicensed as the scope of their activities does not require licencing. But aerodrome and safety remain paramount.
- 4.2 The new Article 208A inserted into the ANO in 2010 states:

'The operator of an aerodrome which is not a licensed aerodrome must not permit an aircraft flying or intended to fly for a purpose specified in paragraph (3) to take off

from or land at the aerodrome unless satisfied on reasonable grounds that the aerodrome has adequate facilities for the safe conduct of such flights.'

4.3 The Explanatory Note clearly captures this:

'Requirements for aerodromes used for flying training and testing

1. Flying training and testing for the grant of a pilot's licence or the inclusion of an aircraft rating, a night rating or a night qualification in a licence need not be conducted from a licensed aerodrome. Aircraft commanders and aerodrome operators must be satisfied as to the adequacy of an unlicensed aerodrome for the purpose of such flying training and testing before conducting or permitting it.'

4.4 This demonstrates the responsibility placed on the aerodrome operator and the weight of judgement they must demonstrate. It follows that the operators' judgements about the safety of their aerodrome if the NG pylons are installed, must be given substantial weight.

5. Human Health and Value

5.1 Mr Harris for the Applicant, emphasised 'Public Safety' in the Hearing. However, EN-1 does not address 'Public Safety', it addresses 'Human Safety'. There seems to be an attempt to suggest that General Aviation aerodromes are small, insignificant and irrelevant and that if pilots and trainee pilots wish to use them they do so at their own risk.

5.2 That is a misrepresentation. In our original submission to this Examination we set out in detail (as did the aerodrome operators and other interested parties), the importance of General Aviation aerodromes for pilot training, recreation, connectivity and their contribution to the surrounding rural areas. We also set out all of the policy protection for General Aviation Aerodromes in the PPG.

5.3 We clearly appreciate the hierarchy of importance of aviation infrastructure across the UK. But General Aviation Aerodromes have clear policy protection for their intrinsic value – and our earlier submissions have highlighted the specific features and importance of the aerodromes affected by this DCO Application.

6. Conclusion

6.1 The Applicant did not, contrary to policy (i.e. EN-1 para 5.5.5), address General Aviation in planning its route identification. It did not place any weight on the early complaints that it had failed to do so and that there would be human safety risks associated with the project. It then applied inappropriate / incorrect policy tests and it now seeks to distinguish between the 'public' and aviators.

- 6.2 It appears that on the basis the advice from ASA to NG that it could ignore unlicensed aerodromes, NG proceeded on this basis until the CAA AAT letter of 20 March 2025 by which time the route design was substantially fixed and change resisted.
- 6.3 Since then ASA / NG has sought to justify its error and the ‘safety assessments’ prepared by ASA are designed to appear authoritative but have, in fact, failed properly to address risk to aviation safety.
- 6.4 The ‘solution’ promoted at the ISH to close aerodromes was disingenuous.
- 6.5 In order to meet EN-1 tests, the Applicant should re-engage and reappraise the aviation safety risks set out by the aerodrome operators and the scheme should be modified to minimise the risks as required by EN-1.
- 6.6 Furthermore, we understand that the North Humber to High Marnham NG route evaluation is being undertaken in a site specific manner in line with the principles set out by the CAA AAT and the CAA CAST and the Aerodrome Operators involved in this Examination.
- 6.7 The comment by the Applicant in the ISH 2 Hearing of ‘...if there is no safe way of operating, then they close.’ is not in accord with policy – whether in EN-1 or the NPPF.
- 6.8 The key issue, in line with the goals of EN-1, is that aviation safety should have been addressed at the beginning, and taken into account in route alignment and definition. This would have obviated the need for operators to invest a massive amount of time and cost, as well as removing the risk to human safety and attendant potential economic impacts on this important rural activity offering recreation, sport¹, training and connectivity. **‘smart and strategic planning’** should have been employed.

¹ As clearly set out in Sport England’s representation.