

***Raydon Wings Aerodrome
Details Limited
Woodlands Farm
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Raydon
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**Norwich to Tilbury
ISH 2 28 April 2026
Written Post-Hearing Submission**

**Raydon Wings Aerodrome
Interested Party Ref: [REDACTED]**

11 May 2026

1.0 Introduction

- 1.1 Raydon Wings Aerodrome (RWA) attended Issue Specific Hearing 2 (ISH2) on Tuesday 28 April 2026 in order to make representations regarding the unresolved matters that exist between the Applicant and RWA in respect of the Norwich to Tilbury grid upgrade.
- 1.2 RWA has worked with the Applicant to draw up an SoCG identifying areas where agreement has and has not been reached. During this process, the Applicant has appeared keen place words in RWA's mouth rather than actually addressing RWA's core concerns. In particular, the Applicant appears keen to suggest that it has engaged fully RWA when, in fact, it has not engaged with RWA in any meaningful manner. This has led to difficulty in reaching agreed and common ground. The matters that remain unresolved between parties from the basis of the arguments set out herein.

2.0 Failure to Adequately Engage

- 2.1 We say that, at the outset of this project, the Applicant did not consider General Aviation (GA) and the potential safety impacts of routing its graduated swathe close to established GA aerodromes, principally because it did not undertake sufficient pre-design research that would have identified the existence of aerodromes lying within or close to the graduated swathe. We say that this amounted to a lack of basic diligence and a failure to follow planning policy.
- 2.2 It appears there are also many non-aviation but proximate amenities that were not considered or taken into account in the construction of the graduated swathe, suggesting that little or no consideration was actually given to the impact of the route of the graduated swathe. Public engagement materials tend to suggest that the route design was primarily based on cost and that the likely concerns of stakeholders and the preferences of the public

were not adequately taken into account at an early stage and before the graduated swathe was identified by the Applicant.

- 2.3 As a result of its lack of early diligence, the Applicant failed to properly consider the safety issues surrounding the proximity of general aviation aerodromes to its proposed Over Head Line (OHL).
- 2.4 The Applicant's Environmental Impact Assessment scoping did not include any consideration of major disaster (IE a loss of life) resulting from the proximity of its proposals to GA aerodromes. This was, we say, a serious error that led to undesirable outcomes.

3.0 Failure to Follow Policy and Best Practice

- 3.1 In respect of new energy infrastructure, NPS EN1 5.5.53 requires 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'*. (emphasis added)
- 3.2 We say that this required engagement should have taken place before any determination of the graduated swathe, but the Applicant did not undertake this work or make any attempt to understand the effect of its proposals on GA aerodromes.
- 3.3 During 2023 and 2024, the CAA CAST team worked with the Applicant and its expert aviation advisor, Alan Stratford Associates, regarding its proposals. The CAA repeatedly advised the Applicant of the necessity of engaging with affected aerodromes to identify and mitigate likely impacts. So, at an early stage the UK CAA made clear to the Applicant the obligation to engage with aerodromes.
- 3.4 In respect of RWA, the Applicant should also give consideration to NPPF paragraph 84 (d) which states, *'Planning policies and decisions should enable...the retention and development of accessible local services and community facilities, such as...sports venues, open space...'*.
- 3.5 Aerobatics, as ISH2 heard, forms a considerable part of the aerial activity at RWA and RWA should, therefore, be classified as a sports related amenity as well as just an aerodrome. The proposed addition of gliding activity at RWA, which has been postponed pending the outcome of this process, is also classified as a sporting activity.
- 3.6 The provision of an airfield capable of providing facilities for such sporting activities is difficult to maintain and likely impossible to establish from a green field site, making the retention of existing facilities of paramount importance.
- 3.7 Despite the clear guidance contained in NPS EN1, the advice of the CAA CAST team and the contents of other national planning policy and guidance, at no

point has the Applicant engaged with us with the aim of understanding and proactively mitigating the effects of its proposals on RWA.

3.8 Despite our offers of cooperation and our expressed desire to find solutions acceptable to all, there has been no involvement sought from RWA in the development of the proposal or in the development of any mutually acceptable mitigation. There has been no engagement whatsoever regarding the position of the OHL and CSE other than our objecting to the proposal when presented during public consultations and the Applicant then refusing to consider any changes on the grounds that it need not consider changes.

3.9 Meaningful engagement has been limited to:

- a. A 15 minute meeting at RWA on 25 July 2023 during which we pointed out that the position of the OHL which, at that stage crossed our extended runway centreline at a distance of a from the runway threshold at a distance of about 600 metres, was problematic.
- b. A 20 minute meeting at an open day at Brentwood on 25 April 2024 during which we tabled our objections to the revised location of the OHL and the CSE as presented, but offered to work with the Applicant to find a suitable compromise including moving the CSE north of the disused Hadleigh to Bentley branch railway line. At this meeting the Applicant's aviation expert insisted that the Applicant need not consider safeguarding at RWA because RWA is not a licensed aerodrome.
- c. A 30 minute virtual (Teams) meeting during the Suffolk 6 Targeted Consultation on 29 April 2025 (a year later) at which we were presented with the final iteration of the OHL and the CSE location - just 250 metres from the runway - and were told there would be no change considered or discussed.
- d. A few email exchanges that have mostly covered the Applicant's desire to have us agree an SoCG. For some time, we resisted agreement due to the chronology of communications seemingly being constructed to try to suggest that the Applicant had carried out more engagement activity than was actually the case.

3.10 At the Open Day event held in Brentwood in April 2024, RWA met with the Applicant and its aviation expert, ASA. At that meeting, RWA was unambiguously informed that it was the Applicant's aviation expert's view was that an unlicensed aerodrome was not required to consider safeguarding and that the CAA did not oversee unlicensed aerodromes and did not expect unlicensed aerodromes (and by default the Applicant itself), to consider safeguarding. This appears to be at odds with advice given to the Applicant buy the CAA at an early stage in its development.

- 3.11 As a consequence, RWA was unambiguously informed by the Applicant's aviation expert that RWA had no inherent right to object to the proposals and that the Applicant would proceed with its proposals as it saw fit and without any regard to RWA's concerns which its expert viewed as being unreasonable, it having - it claimed - unilaterally assessed that there was no impact on RWA.
- 3.12 We made it clear that this was not our interpretation of relevant regulation, guidance and best practice.
- 3.13 We reasoned that any obstacle that would be considered unsafe at a CAA licensed aerodrome would logically be no safer at an unlicensed aerodrome given that the laws of physics the skill of pilots and the capabilities of aircraft do not change simply because of the licensing regime of an airport.
- 3.14 We suggested that some simple changes - in particular the relocation of the CSE - would potentially address our concerns to a degree that, along with some operational changes, might provide an adequate mitigation.
- 3.16 The Applicant consistently rejected our suggestion and effectively refused to discuss changes to its proposals, though it did redesigned the route of the underground cable after it discovered that the proposed route interfered with a large water main, to the existence of which it was oblivious. The Applicant evidently believed, based it seems on the advice of its aviation expert, that it need not consider making changes or accommodating our valid concerns.

4.0 Civil Aviation Authority (CAA) Intervention and Advice

- 4.1 On 20th March 2025 and following a conversation with RWA and other aviation stakeholders, the CAA wrote to the Applicant in respect of safeguarding at unlicensed aerodromes setting out various key points and concerns. It ruled that,

"It should not be assumed that such aerodromes have not already achieved adequate levels of safeguarding or that any changes to their environment caused by development, will not adversely impact their operation.

"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".

- 4.2 This letter confirmed our position as being correct. Unlicensed aerodromes require the same application of safeguarding logic as do licensed aerodromes.
- 4.3 In its letter of 20th March 2025, the CAA also specifically expressed its concerns regarding the effect of the Applicant's proposals on RWA.

- 4.4 Despite this warning, the Applicant made no attempt to engage with RWA in order to mitigate the impacts of its proposals.
- 4.5 The only practical difference between a licensed aerodrome and an unlicensed aerodrome is that at a licensed aerodrome the CAA has oversight of safeguarding and issues an aerodrome licence which certifies that the aerodrome concerned meets ICAO Annex 14 conditions.
- 4.6 Somewhat ironically, the issue of safeguarding is now the one point upon which both RWA and the Applicant now agree. In the draft SoCG it is agreed between RWA and the Applicant that the same OLS slopes that apply to licensed aerodromes should be applied at unlicensed aerodromes.
- 4.7 Sadly, despite reaching agreement on this key point in the spring of 2025, the Applicant has declined to consider changes to its proposals on the basis of aerodrome safeguarding.

5.0 Outcome of Failure to adhere to Policy, CAA Advice & Regulations

- 5.1 As a result of the erroneous advice received by the Applicant, from inception of the project until late March 2025 (when the CAA corrected the position) the Applicant developed its proposed OHL and associated CSE infrastructure in the firm belief that it could ignore the concerns of proximate aerodrome operators. This resulted in a great many avoidable and highly undesirable outcomes being 'baked' into the proposals.
- 5.2 Once aware of its error, instead of engaging with RWA to identify an acceptable compromise, the Applicant simply presented RWA with its finalised proposals during the Suffolk 6 Targeted Consultation and informed RWA that whilst it acknowledged that the OHL breached the OLS slopes at RWA and it noted our concerns regarding the location of the CSE, the Applicant (or more particularly its aviation expert), did not consider these infringements material and as a consequence the position of the OHL and CSE had been based solely upon the geology and ecology reports.
- 5.3 By way of justification, the Applicant invites the Inspectorate to believe that the position of the CSE was determined according to Horlock Rules, but Horlock rules require the consideration of reduction of amenity, in this case RWA). Moving the CSE north of the disused railway line would, potentially, have satisfied this criteria without adversely affecting any other criteria.
- 5.4 In any case, we say that the risk to human health presented by the location of the CSE and the dropper cables that feed it, is unacceptable and that this condition should be satisfied before any consideration of Horlock rules.
- 5.4 Horlock rules, which are a best practice policy of the National Grid as opposed to national planning policy, become applicable only after all other criteria set out in national planning policies have been satisfied (although we acknowledge that there exists some obvious overlap).

6.0 Applicant's Damage Limitation Attempts and Flawed Safety Assessments

- 6.1 Following the CAA letter of 20th March 2025, the Applicant has, in cooperation with its aviation expert, began what can only be described as a damage limitation exercise. The Applicant sought to demonstrate that the hazards to aviation that it had 'baked' into its design during 2023/4 do not present an unacceptable risk to GA. It is essentially a "nothing to see here" approach.
- 6.2 In pursuit of this end, the Applicant has unilaterally produced safety assessments purporting to show that safety levels at various aerodromes along the graduated swathe (including RWA) are acceptable. It has produced these assessments without any reference whatsoever to aerodrome operators. The Applicant refuses to accept that aerodrome operators should be the arbiter of whether the hazards presented by its proposals are acceptably safe.
- 6.3 We say that because, in the preparation of these safety assessments, the Applicant's aviation expert did not conduct a hazard identification process (HAZID) in cooperation with aerodrome operators along the route of the OHL, its safety assessments are fatally flawed by numerous unidentified omissions and have not, therefore, properly considered all likely hazards and impacts.
- 6.4 The Applicant now invites the Inspectorate to ignore GA stakeholders and to accept that its safety assessments are credible and furthermore, are more credible than those of the aerodromes and stakeholders affected.
- 6.5 The Applicant suggests that the Inspectorate can and should rely upon the opinion of the Applicant's aviation expert in its determination as to safety.
- 6.6 We say that this position is untenable. The Applicant's aviation expert has consistently provided the Applicant with erroneous advice which has adversely affected the manner in which the Applicant has progressed its proposals.
- 6.7 Regrettably, even basic statistics and safety methodology seem beyond the competence of the Applicant's aviation expert. By example, we note that the Applicant's aviation expert was unable to present ISH2 with a satisfactory methodology for its safety assessments. Alarming, it provided ISH2 with what can only be described as grossly misleading information regarding the frequency of piston engine failures in light aircraft.
- 6.8 For the Applicant, at ISH2, Mr. Nils Jaiemson (ASA) stated that the occurrence of engine failure in piston light aircraft was around 1 in 10 million flight hours (which was presented to ISH2 as being one in ten to the power of seven).
- 6.9 The US FAA NTSB database (the largest and most authoritative database in the world) suggests that the failure rate for piston engined aircraft is actually around 1 in 3200 flight hours.
- 6.10 General aviation aerodrome operators and aerodromes are well aware of this statistic, but the fact that the Applicant's expert has this critical likelihood

of engine failure so fundamentally wrong must cast doubt upon the validity of its safety assessments as they will, presumably, have been predicated on an engine failure rate of 1 in 10 million as opposed to 1 in 3,200 flight hours, but may be as high as 1 on 10,000 in some well-maintained and low workload systems (or ten to the power of 4)

- 6.11 During ISH2, when challenged as to the validity of the aviation expert's safety assessments, Mr. Harrison, for the Applicant, suggested - for the first time that we are aware of - that if aerodrome operators do not agree with its safety assessments, those aerodromes always have the choice to cease or otherwise limit their aircraft operations.
- 6.12 If this application is approved as proposed, many GA aerodromes, including RWA, will have no option but cease operations.
- 6.13 Given the overarching aims of NPS EN1 and the government's General Aviation Strategy and other associated policy, this is an extraordinary position for the Applicant to adopt when suitable mitigation could have been found in the majority of cases and serves to demonstrate the mindset of the Applicant in dealing with general aviation interests.

7.0 Summary & Key Points

- 7.1 We say that the lack of meaningful engagement with aerodromes and an ill-conceived approach to aviation safety considerations, driven primarily by a fundamental error of understanding on the part of its aviation expert, has resulted in a complete failure on the part of the Applicant to correctly follow the protocols set out in NPS EN1 and other key planning policy. In particular, we say that the requirement set out in EN1 para 5.5.5 has not been met:

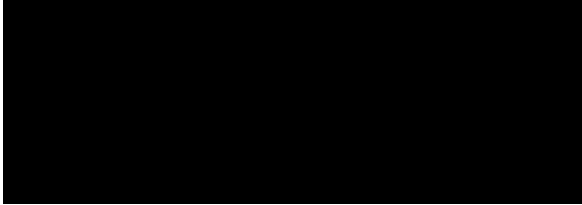
"It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure".

- 7.2 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..."*
- 7.3 During ISH2, we heard Mr. Harrison, for the Applicant, walk us through the decision making guidance NPS EN1 imposes on the Secretary of State in reaching a decision.
- 7.4 Mr. Harrison presented a hierarchy of aerodromes with licensed and officially safeguarded aerodromes being of most value and unlicensed aerodromes having less priority.

- 7.5 We do not dispute Mr. Harrison's interpretation of EN1 in this respect, but as we pointed out, that prioritisation does not preclude or annul the overarching requirement set out in EN1 5.5.5 (to ensure minimum adverse impact on aerodromes), nor does it lessen the need for the Secretary of State to be objectively assured that minimum impact has actually been achieved (EN1 5.5.50).
- 7.6 We say that the Applicant has entirely failed to adequately follow both the letter and the spirit of NPS EN1 and other national policy protecting General Aviation and the amenity it provides in its various forms.
- 7.7 As a direct consequence, the Secretary of State cannot be assured that the adverse impacts on the operation and safety of aerodromes have been minimised.
- 7.8 We say, that as a direct consequence of the somewhat arrogant and uncooperative manner in which the Applicant (and more particularly, its aviation expert) has conducted itself, a great many avoidable adverse impacts to GA were incorporated into the Applicant's proposal from an early stage.
- 7.9 As time progressed and due to the intransigence of the Applicant, these impacts became increasingly 'baked' into the proposed designs. Despite early and ongoing concern from aviation stakeholders, rather than addressing any impacts as far as practically possible, the Applicant demonstrably sought to belittle and discount the concerns of aerodrome operators, including concerns and clear and specific objections expressed by RWA.
- 8.0 Requested Remedy**
- 8.1 For the reasons set out above, we ask the Inspector to refuse this application for a DCO.
- 8.2 In the alternative, we ask the Inspector to direct the Applicant to revisit all aspects of the OHL/CSE and associated infrastructure wherever aviation stakeholders have expressed concerns in order to consider redesigning those sections where adequate mitigation cannot be achieved and/or agreement reached by other means.
- 8.3 We understand the pressing need for upgraded energy infrastructure and we broadly support the initiative. However, we believe that any small delay caused by a requirement to revisit the impacts of the proposed development is justified and results only from the Applicant's failure to adequately follow prescribed process.
- 8.3 We note that, during ISH2, the Inspector asked the Applicant to re-engage with RWA. RWA reached out to the Applicant the following day. As at the date of this submission, no response has been received.

8.4 We must, regrettably, conclude that no re-engagement with aviation stakeholders will take place unless expressly required by the Inspectorate.

Per Pro Raydon Wings Aerodrome



Will Curtis
Director and Accountable Manager