

From: [REDACTED]
Sent: Mon 22/06/2026 12:23
To: Norwich to Tilbury NorwichtoTilbury@planninginspectorate.gov.uk
Subject: Raydon Wings Aerodrome – Interested Party Ref: [REDACTED]

Dear Inspectorate,

We write to record and highlight some serious material inaccuracies in the Applicant's latest written response to our REP4-370.

In particular, in its latest representations, the Applicant seeks to persuade the Inspectorate that it has, *"not received feedback from the CAA, nor engaged directly with the CAA's Combined Aerodrome Safeguarding Team (CAST) (our response to GEN 1.20 within 8.9.1 Applicants Responses to First Written Questions [REP3-047]."*

This is manifestly untrue. In his letter of 20 March 2025, [REDACTED] of the CAA CAST team wrote:

"Of Raydon wings, I understand that there has been some adjustment to the proposed line route in proximity to the aerodrome. At present, I understand that owners of the site face an uncertain future because of the proposed line route. Raydon wings operate and accommodate vintage aircraft types such as Spitfires. This brings its own unique challenges. Pilots of such types fly a military style circuit pattern which is ovular in shape, rather than a conventional rectangular pattern. This is important for several reasons including the inherent reduced cockpit visibility of such types, energy management in the descent (height and speed). Additionally, such types tend to exhibit greater form drag (aerodynamic) tendency, making optimised approaches important. Part of this is flying the penultimate leg of the approach (base leg) into wind as they do today. At present, the aerodrome enables aerobatics and flight training and is looking to attract approved training organisations. The ability for the site to continue to operate as it does today, as well as to adapt and change over time, (a key requirement set out in the NPPF and General Aviation Strategy), is not assured. Part of the issue seems to be the close proximity of the sealing end compound of the proposed scheme, and related pylons to the aerodrome, just 300m. We understand that the terrain is slightly lower to the north of the old railway line. An alternative location for the sealing end compound might offer greater vertical clearances by moving infrastructure away from sensitive aviation factors. Further discussion with the aerodrome will be most valuable in finding a solution." (Letter attached herewith for reference).

[REDACTED] concluded by suggesting that:

"Now that a clearer picture is emerging of the expected impact to these aerodromes, I strongly recommend swift engagement, as stated in previous commentary."

This suggests, contrary to the Applicants recent submission, the Applicant has received a good deal of guidance advocating engagement with aviation stakeholders. Despite the clear suggestion in March 2025 that the Applicant engage with aviation stakeholders, including Raydon Wings aerodrome over which [REDACTED] expressed special concern, the Applicant did not make any effort to engage or to enter into the basic conversation that, we say, would almost certainly have resulted in an acceptable compromise.

It also suggests that the Applicant seeks to mislead the Inspectorate by suggesting that it has had no interaction with the CAA CAST team when in fact it has been consistently advised to engage early, fully and in good faith. It has done none of these things and continues to refuse invitations and even instructions to do so.

Further, the Applicant seeks to cast doubt over our submission regarding the rate of engine failure suffered by piston engine light aircraft. It claims that its data, obtained it says from an Australian data source, is empirical. However, CASA, whilst the Australian aviation authority published a report regarding piston engine failure (<https://www.atsb.gov.au/investigations/ar-2013-107>), it placed the likelihood of an engine failure for piston powered aircraft as being 3.21 per 10,000 flight hours. We have presented data collated by the US Federal Aviation Administration National Transport Safety Board (FAA NTSB), which is the largest such database in the world which suggests an almost identical engine failure rate of 1 in 3,200 flight hours.

We suggest that the Applicant seeks to deliberately mislead the Inspectorate regarding a significant hazard to aviation safety. On the basis that it has seriously misrepresented the real engine failure rates, we submit that the Applicant's safety assessments should be considered void and of no value in reaching a decision.

We would like to note that we met the Applicant by virtual means on Monday 15th June. The Applicant was firm in its conviction that it need not consider moving its CSE on the basis of cost alone. The Applicant asked us to provide further evidence of lost commercial opportunities resulting from its proposals. It is clear that, despite being asked to do so by the Inspector at ISH2, the Applicant refuses to properly discuss or consider the matter of safety at Raydon Wings Aerodrome. It prefers to prevaricate and to suggest that the onus is on us to prove the hazard to aviation. As the Inspectorate will appreciate, the consideration of any safety hazard is somewhat subjective, but where a risk to life exists, the maxim, 'err on the side of caution', is surely appropriate advice.

We ask the Inspectorate to require the Applicant to return to the matter of the location of the CSE and OHL in the vicinity of Raydon Wings aerodrome in order that it carry out the work it should reasonably have undertaken over the past 3 years. Any delay to its programme arising from such work is regrettable but is entirely of the Applicant's making. If properly arranged, it need not cause a delay to the delivery of the entire project.

We would be most grateful if you could please acknowledge receipt of this email representation.

Best Regards,



Director & Accountable Manager
Raydon Wings Aerodrome




National Grid

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20/03/2025

CAA, AAT Position statement: National Grid – Great Grid Update

Dear Simon,

As you know, the Airfield Advisory Team will be disbanded at the end of March after four and a half years of providing guidance and support to government, general aviation aerodromes, local planning authorities and other stakeholders on a wide range of matters.

It has certainly been a pleasure to have provided support and input to National grid in relation to the Great Grid Update, and how proposed new line routes could adversely impact established aviation systems.

Whilst this position statement, focusses predominantly on the Norwich to Tilbury aspect of the wider GGU scheme, the sentiment can be extrapolated for other proposed routes. The purpose of this position statement is to centralise our thoughts prior to disengagement at the end of March, when the AAT will cease to function.

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.

Instead, we propose that many factors come in to play when considering the extent of impact that proposed new line routes could have on established aviation systems. On 26th July 2024, we sent you an independent assessment of potential impact to a number of aerodromes within a defined corridor along the Norwich to Tilbury Route.

See excerpt from the document which set out our assessment criteria¹

“As a baseline for assessment, the AAT has considered aerodromes within a 10km-wide corridor, centred on the proposed power line. The AAT has identified 17 aerodromes within this corridor along the length of this proposal. At this stage, we have focussed our points on the practicalities of how this scheme may impact these aerodromes and perhaps where further, more technical work could be required.

The aerodromes assessed represent the diversity of GA aerodrome sites across the network. They include large gliding sites, small commercially minded training operations, private sites and a hospital helipad.

For each aerodrome, the following has been considered as part of a desktop assessment:

Nature of aerodrome operation

The nature of an aerodrome site including traffic blend, aircraft types and movement numbers may be a key consideration for assessment.

Existing power lines

Existing power infrastructure in proximity to aerodrome sites may represent an important assessment vector. For example, do they demonstrate a level of impact at present, is this tolerable? Could additional infrastructure associated with the proposed scheme compound any existing challenges or create new ones?

Proximity of the aerodrome to the proposal

The proximity of an aerodrome site to the proposed scheme may have an important bearing on the extent of any impact to the aerodrome operation. Aerodromes located in close proximity to the proposed scheme may be impacted to a greater extent than those further away. The extent of any impact could also be influenced further by other factors.

Local topography

Consideration of aerodrome elevation and wider local topography may be relevant when establishing the extent of any potential impact. For example, where the proposed infrastructure is sited on terrain of higher elevation than that of an aerodrome, specific or compound impact may arise. This consideration should extend out to a suitable range, taking into account runway heading and associated flight tracks over the ground including circuit training where applicable, and the nuanced nature of glider launch and recovery where applicable.

Due to the number of aerodromes along the scheme’s proposed route and the complexity of assessing multiple sites, each with their own nuanced operation, we have

¹ UK CAA AAT Response to consultation -26th July 2024 – sent to National Grid

adopted a high level, ‘say what we see’ approach, accompanied by technical information as required. Our intention is to offer an objective and accessible summary of potential impacts to aerodromes along the route of the proposed scheme.”

As stated in our conclusion in our July 2024 document, our intention was to provide early horizon scanning opportunities to National Grid and their consultants, Alan Stratford and Associates and to assist with the understanding of the potential impact of the scheme.

During a stakeholder meeting on 23rd January 2025, I was pleased to learn that since our discussions in 2024 and the submission of our assessment, some modifications to the proposed line route have been made. I also thought that the suggestion of working toward a statement of common ground was very beneficial.

As of today, it seems that a much clearer picture is emerging in relation to how the proposed Norwich to Tilbury line route is expected to impact aerodromes. Of the 17 aerodromes we assessed, the majority seem to be low impact. There are however 3 aerodrome sites which are likely to be impacted to such an extent that further consideration is required to avoid the expected level of detrimental impact to them. These were discussed in some detail during the stakeholder meeting of 23rd January 2025. They are Tibenham, Priory Farm and Raydon Wings. I understand that at a recent targeted consultation, National Grid advised both Tibenham and Priory Farm that National Grid would engage more directly for further discussions. It would be beneficial to know if this has occurred yet and what the outcomes are.

To some extent, the impacts to Tibenham and Priory farm are interlinked and complex, owing to their close proximity to each other. Tibenham is an important gliding site. I was concerned by suggestions that glider tow aircraft had the performance to climb clear of the proposed powerline infrastructure. Indeed, this suggestion harked back to an earlier time in these discussions when aircraft performance was cited as the cure to any perceived obstacle issue that was identified, as referred to earlier. The reality is that the performance of both glider tow aircraft and gliders, are variable and based on many factors including meteorological conditions such as wind vectors, air temperature and air pressure, gross weight of tow aircraft including pilot and of course the glider and pilot which is being towed. Furthermore, gliders returning to Tibenham will face challenges in clearing the proposed line for a variety of reasons. Energy management height, speed and range from Tibenham are of course variable and will be impacted by other factors as described above. This has the potential to stop competition flying at Tibenham completely.

Priory Farm located 1km to the west of Tibenham. The mid point of Priory Farm’s runway is just 800m East of the proposed line route. As described in our July 2024 assessment, this will result in pilots including students directly overflying the lines at

low height and airspeed at multiple points within their airborne circuit pattern. The circuit pattern cannot be flipped to easterly directions because of Tibenham's proximity.

Of Raydon wings, I understand that there has been some adjustment to the proposed line route in proximity to the aerodrome. At present, I understand that owners of the site face an uncertain future because of the proposed line route. Raydon wings operate and accommodate vintage aircraft types such as Spitfires. This brings its own unique challenges. Pilots of such types fly a military style circuit pattern which is ovular in shape, rather than a conventional rectangular pattern. This is important for several reasons including the inherent reduced cockpit visibility of such types, energy management in the descent (height and speed). Additionally, such types tend to exhibit greater form drag (aerodynamic) tendency, making optimised approaches important. Part of this is flying the penultimate leg of the approach (base leg) into wind as they do today. At present, the aerodrome enables aerobatics and flight training and is looking to attract approved training organisations. The ability for the site to continue to operate as it does today, as well as to adapt and change over time, (a key requirement set out in the NPPF and General Aviation Strategy), is not assured. Part of the issue seems to be the close proximity of the sealing end compound of the proposed scheme, and related pylons to the aerodrome, just 300m. We understand that the terrain is slightly lower to the north of the old railway line. An alternative location for the sealing end compound might offer greater vertical clearances by moving infrastructure away from sensitive aviation factors. Further discussion with the aerodrome will be most valuable in finding a solution.

As this most important scheme progresses, it will be crucial that aerodrome safeguarding consideration is adequately understood by those considering final route alignment and those that provide aviation guidance. Both licensed and unlicensed general aviation aerodromes are encouraged to take steps to ensure that their sites are not impacted by adverse development. A misconception is that unlicensed sites do not require such consideration.

The fact is that the vast majority of general aviation aerodromes are unlicensed and are not officially safeguarded. This simply means they are not afforded a 'call in' opportunity in the event that a development they have raised concerns about, is permitted.

General aviation aerodromes may be licensed if they wish to accommodate certain movements. These might include some types of training or other level of service provision associated with their wider architecture, such as a higher number of more sophisticated / complex movements.

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.”²

In summary, it seems that a great deal has been achieved in identifying aspects of the Norwich to Tilbury route which are both likely and less likely to impact established aerodromes. It will be necessary to work closely with aerodrome owners and operators to ensure that these concerns are well understood to enable cost effective mitigation measures to be identified swiftly. Now that a clearer picture is emerging of the expected impact to these aerodromes, I strongly recommend swift engagement, as stated in previous commentary.

Should you wish to discuss this further, please don't hesitate to contact me.

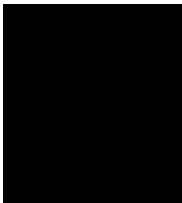
Kind Regards


Airfield Advisory Team Principal

Civil Aviation Authority

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CC to the following recipients

 – GAAC
 – Suffolk Council
London Oxford Airport
Tibenham Aerodrome

² Safeguarding Scope – CAP 738 Safeguarding of Aerodromes