

Norwich to Tilbury
ISH 4 25 June 2026
Written Post-Hearing Submission

General Aviation Awareness Council
[REDACTED]

We have already set out relevant policies and principles. Those are not repeated here but we wish to respond to the Applicant's response to the ExA questions.

We have not read all 400 odd pages, but have endeavoured to fully grasp the thrust of the Applicant's comments in respect of airfields and aviation safety.

It is wholly inappropriate for the Applicant to be insinuating that some airfields were helpful and happy whereas others were just being difficult.

The 'happy' airfields are generally those where [REDACTED] Head of the CAA AAT, undertook a thorough and detailed appraisal of the site and was able to suggest appropriate changes to the aerodrome operations or minor route realignment

But, [REDACTED] raised serious concerns about the risk to Tibenham, Priory Farm and Raydon Wings and was not able to identify any means of appropriate mitigation.

In [REDACTED] letter to the Applicant dated March 2025 he wrote

'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'

Followed by

'To some extent, the impacts to Tibenham and Priory farm are interlinked and complex, owing to their close proximity to each other'

Yet only a few weeks after receipt of that report in 2025, the Applicant published their simplified Aviation Impact Assessment that ignored that expert advice and concluded that, in respect of Tibenham:

'An aerotow combination would have sufficient room to manoeuvre away from the OHL after take-off'

I have revisited my notes of meetings in 2024.

I am clear that ASA clearly predicated their approach based on their position that unlicensed sites don't count. This was clear at the first meeting on 11 March 2024.

The second meeting with ASA was on 7 May 2024. It was stated at that meeting:

‘Operators have the right not to operate - that is their choice’

But that choice should not be forced on them by an NSIP application that does not comply with EN-1 or paragraphs (in particular) 111(f) and 200 of the NPPF.

It was also stated:

‘There are different safety standards. Licensed airfields have a higher level of safety assurance,’ ‘Unlicensed sites can set their own safety standards.’ ‘That’s why there are licensed and unlicensed.’

This is incorrect. The requirement for licensing relates to the nature of activities, not to safety standards

I am also aware that in talking to [REDACTED] at Raydon Wings that on 6 May 2024, [REDACTED] had a conversation with ASA and the same principle was put to [REDACTED].

I remain convinced that NG ignored aviation safety at the start of scheme design. There was no reference to aviation in the original ‘East Anglia Green’ documents and the GAAC wrote to EAG on 13 June 2022 and again on 11 July 2023 urging engagement with aerodrome operators. There was no response to these requests.

At a late stage of scheme planning they realised they needed to address it, but the route was already fairly firmly defined. So, without any proper appraisal / and not wishing to look at this issue properly they used ASA as they knew they would do whatever NG wanted.

I am also aware that another NG project is conducting the aviation risk assessment in a professional manner and prior to detailed route alignment. This approach involves site specific appraisals defining the nature of the activities, examining topography and site characteristics, and is endeavouring to make adjustments so as to minimise adverse impacts on the aviation interests.

I believe that this is the correct approach, but it was not carried out properly for this project which raises the question of dual standards in the Applicant’s approach.

It is stated in the Applicant rebuttal that the team at ASA is experienced. I do not challenge that. However, they do **not** have the site specific experience and knowledge - and as has been explained before, the CAA regards the aerodrome operator as the expert, having a detailed understanding of topography, weather and the nature of the activities taking place. In addition, the assessment methodology which ASA has applied has been significantly more basic than, for example, the highly specialist and professional work undertaken by D [REDACTED] a renowned aviation safety expert.

In the last few weeks, the Applicant has been seeking to reach some agreement with aerodromes, very much in response to the ExA's questions and concerns. That should have been undertaken in 2022 at which time minor route adjustment for a mutually satisfactory alignment would have been possible.