



Norfolk Gliding Club Ltd

Tibenham Airfield, Diss, Norfolk, NR16 1NT
www.norfolkglidingclub.com
admin@norfolkglidingclub.com
T:01379 677207

Norwich to Tilbury EN020027

Interested Party Reference Number [REDACTED]

**Response to ISH 4 – Thursday 25 June
Aviation Safety**

Introductions

The following is in response to the published transcript of the above ISH4 in connection with Aviation Safety

Whilst much of the transcript is difficult to follow, comments and clarification have been appended to various salient paragraphs to aid the ExA's understanding of the safety issues involved

Feedback from the meeting with the BGA and NGC is included

Ref 00:22:44:12

The Applicant appeared confused when addressing the matter of aviation and public safety, quoting the chicken and egg problem and the responsibilities of the aerodrome operator yet in reality it is relatively a straightforward matter

As far as the aerodrome operator is concerned the CAA guidance confirms

'The matter of public safety is one for the aerodrome operator and that insofar as operations are alleged by an operator to be unsafe then they will not happen and the operator will cease that element of the operation'

And, whilst we were preparing the NGC safeguarding plan, the CAA AAT advised that what might be considered a safety risk by one person, might not by another and qualified that by reference to UK Regulation 2018/1139 which in summary states that

‘Only the aerodrome operator holds expert opinion as to safety when it comes to the question of proposed obstacles around their airfield’.

As the aerodrome operator, NGC confirm that current operations with respect to runways 26 and 33 can continue without the question of public safety being an issue and within those CAA guidelines

The Applicant meanwhile is seeking to erect a 200ft electrified wall across the ends of these two runways and makes reference to the “chicken and egg problem”

But the “chicken and egg problem” is a classic paradox of circular causality where it is impossible to determine which of two interrelated events caused the other. There is no such dilemma here since as confirmed above, there is no public safety issue at present

However, if constructed as currently configured, that 200ft obstacle would form an unacceptable aviation safety risk to operations on both runways which has repeatedly been identified by ourselves as the aerodrome operator, the BGA and other aviation bodies such as Eddowes Aviation Safety Consultants

Furthermore, the Applicant’s aviation consultants, in their response REP4-302 table 2.2 Item 5 (Aviation Safety), 5.1 Aviation Discussion, stated when responding to the possibility of Engine Failure After Take Off (EFATO) and similar incidents that

‘The Applicant accepts that there is a period in the middle where hitting the line is a possibility’

Such a collision is frequently fatal or results in life changing injuries

Therefore, if this project were to go ahead as proposed, in order to continue safe operations the aerodrome operator would have no option but to respond to the new adverse impact caused by the OHL and close those runways even though as the ‘agent of change’, NPPF para 200 identifies the Applicant as having responsibility for mitigation in these circumstances

The Applicant continues with

‘So that there’s no risk associated, they’d have to close to that extent. So in Tibenham for example, there would be two runways which they say would be unsafe. We disagree and we’re working on solutions’

Which would seem to highlight a problem within the Applicant's team where their aviation consultant has already confirmed that there will be an increased safety risk (see above) forming an adverse impact which can only be resolved by the Applicant proposing design-led mitigation

Ref 00:27:14:15

Another example of not being fully au fait with the limited consultation to date.

When the first draft versions of the SoCG and AIA were published by the Applicant last summer they agreed to provide written explanations of pertinent data that would enable a meaningful discussion of both documents.

That discussion would have included all mitigation options and highlighted the aviation safety risk posed by the pylons and, if unchanged, the fact that NGC would be left with no option but to close two runways contrary to NPS and NPPF guidelines

In the event the Applicant chose to withhold the pertinent information and the consultation was adjourned to give them time to reconsider. Despite multiple attempts to resume the consultation the Applicant continues to refuse to supply the agreed information which prevents development of and possible acceptance of the SoCG and AIA

Ref 00:29:04:18

Further comments from the Applicant demonstrating that they do not have a comprehensive understanding of the operational activities at a large airfield and reverting to the issues of public safety claiming that

'they (we assume NGC) agree with the approach that we've adopted'

For the avoidance of doubt, NGC have **objected** to the approach and proposals for an OHL to be built so close to the ends of two of our runways on the grounds of aviation safety ever since we attended the first non-statutory consultation in the summer of 2023

That position will not change unless the Applicant agrees to design-led mitigation in the form of realignment or undergrounding

The adopted approach involving the AIA was identified by the CAA AAT in March 2025 as inappropriate and a written explanation of why the Applicant chose to ignore that advice was one of the questions that should have been answered in the withheld information identified above

Ref 00:31:50:17

Further confusing comments from the Applicant

‘the Applicant is clear that there is no safety risk or that there can be modifications’

Reads not only as two contradictory statements, either there is no safety risk (which we dispute) or there is a risk and modifications can be made and fails to agree with the Applicant’s aviation consultants who agree that there is an aviation safety risk (see above)

To repeat my comment from above, NGC have **objected** to the proposals for an OHL to be built so close to the ends of two of our runways ever since we attended the first non-statutory consultation in the summer of 2023 on the grounds of aviation safety

That position will not change unless the Applicant agrees to design-led mitigation in the form of realignment or undergrounding

The Applicant further comments

‘So we aren’t saying anything is unsafe’

But the Applicants own aviation consultant disagrees and states that in the event of an emergency an aircraft taking off from runway 26 or 33 could collide with the OHL in their response REP4-302

Ref 00:45:06:28

Applicant, BGA and NGC meeting

Present were [REDACTED] and myself

Whilst the meeting started reasonably with the Applicant showing some drawings indicating that on a straight glide to land on 08 from the west (for example in a competition finish) there would be some high-performance gliders that would be lower than 200ft as they crossed the pylon line. They claimed that it has been agreed (but with whom) that the minimum clearance should be 100ft

There has been no such discussion or agreement with Norfolk Gliding Club

The Applicant concluded that

No one would be that low that far out

You just need to change competition rules to ensure higher finishes

Clearly the Applicant has no experience of how Glider Competition pilots operate despite [REDACTED] claim [Ref 00:39:01:08]. Success or failure can influence their selection for the British Team and they will always push the margins and could easily be below the proposed pylon height if it gives them an advantage.

Whilst we can setup local competition rules to promote higher finishes, all pilots returning from the west need to get back to the airfield and an unexpected loss of height due to a

failed thermal or misjudgement on the final glide could result in collision with the OHL

Referring to the draft SoCG published by the Applicant I questioned why they claimed consultation with NGC in 2022 when the first contact was in mid-2023. In their reply the Applicant stated that the GAAC had written to National Grid in 2022 suggesting the need to liaise with NGC and that constituted a consultation

I asked why the April 2022 routeing report only identified two airfields yet in the hearing they claimed all airfields were considered, why were they omitted from the report? The Applicant claimed that was not said at the hearing and all airfields were considered from the inception of the project in which case, again, why were they not included in the report?

In a report from the initial Palgrave / National Grid presentation in 2022, a resident commented that National Grid had stated that they believed Tibenham and Priory Farm were non-operational and it came as a surprise when they were told otherwise by one of the audience members. How does that response relate to the claim that all airfields were considered and having been made aware why did they not contact both airfields as a matter of urgency?

I referred to the CAA AAT letter of March 2025 which identified the AIA as flawed methodology and asked when were we going to get an answer from ASA. The Applicant became somewhat agitated and claimed that the answer was provided at the August consultation. But in doing so seemed to forget that that consultation was adjourned because the agreed information (of which an answer to this issue was included) was withheld by them and is still outstanding

When asked for an answer [REDACTED] (ASA) admitted that they had decided to ignore CAA advice and guidance

However, Norfolk Gliding Club along with all other airfield operators in the UK have to abide by the advice, guidance and rules promulgated by the CAA and **NOT** [REDACTED] and Associates.

In the event of an accident it would be CAA rules not ASA opinions that would determine culpability and therefore any and all aviation safety issues should be determined with that in mind

I commented that since this was an NSIP project it would appear that you (the Applicant) consider yourselves being able to ride roughshod over everything - at which the Applicant replied yes, it is, and yes, we can

At that point I felt that further discussion was pointless and left the meeting

This sort of response is symptomatic of the way in which consultations have progressed over the last three years and encapsulates the very reason we have been saying that they have not been meaningful

Conclusion

By continually referring to “matters of public safety” the Applicant is misleading the ExA in respect of the real issues.

The proximity of the OHL represents an aviation safety hazard that can be mitigated by design-led changes in the form of realignment or undergrounding

Some of the Applicants team recognise that there is a safety issue with respect to the proposed alignment which could result in fatalities whilst others in the team do not

Should the proposal go ahead as currently configured NGC would be faced with closing 2 of the 6 asphalt runways with a corresponding loss of operational amenity and financial implications

The lack of meaningful consultation, the continued refusal to provide the withheld information from last August, their decision to ignore professional aviation expertise and accept national planning guidelines means that as matters stand, NGC will be unable to sign or accept the SoCG and AIA

[REDACTED]
[REDACTED]

Norfolk Gliding Club