



5 April 2025

East Pye Solar Project Team
East Pye Solar Limited
Island Green Power Limited

Dear Sir

East Pye Solar
East Pye Solar Phase One Consultation Summary Report

I refer to your email message and document links received on 19 March 2025.

I write on behalf of the General Aviation Awareness Council (GAAC) further to our earlier representations in December 2024 drawing attention to the potential risks posed by the proposed solar farm on the aviation operations of Norfolk Gliding Club at Tibenham.

We drew attention to the national role of the GAAC and the breadth of its member Associations which include the British Gliding Association (BGA), Aeroplane Owners & Pilots (AOPA), the Light Aircraft Association (LAA), the Honourable Company of Air Pilots (HCAP), the UK Drone Association (ARPAS), the Aerodrome Operators Group (AOG), British Business and General Aviation Group (BBGA), and the British Microlight Aircraft Association (BMAA), which comprise 250,000+ members involved in fixed wing, helicopter, Microlight, Balloon, Drone and Aeromodeller activities.

We drew attention to the failure of your consultation information to take account of aviation activity.

I append the key points made in that letter.

We also set out the issues that the Environmental Impact Assessment needs to address.

- a. A thorough, detailed assessment of the potential threat to aviation safety by virtue of glint and glare. This must take account of the nature of the Aerodrome, with its three runways and the nature flying activity at Tibenham. The predominant activity, gliding, does not have standard take-off and landing patterns. Tibenham provides pilot training adding to the need for all assessments to be ultra cautious.

The proximity of the proposed sites around Great Moulton are of greatest concern (the closest point is approximately 1300m away from the nearest runway) but all of the sites within the project area need careful assessment and the implications of any compromise of aviation safety must be fully addressed.

There should be full and detailed discussion with the Norfolk Gliding Club to ensure that any necessary modifications to the site layout are made at the earliest opportunity and / or that critical areas are omitted from relevant development areas.

- b. In addition, it is essential to assess any areas where the presence of the solar panels could compromise the safety of people forced to land outside of the aerodrome boundary – potentially due to an emergency landing or a launch failure after take-off. The cumulative risks from the solar PV panels must be assessed alongside the proposed National Grid overhead power line.
- c. There is growing understanding of thermal updraughts generated by large areas of solar PV panels. There is currently no FAA advice on this but all available reports of turbulence being generated should be examined and the safety implications of this issue, particularly affecting gliding activity must be considered.
- d. Seeking to achieve biodiversity net gain is welcomed. However, solar panel installations are known to attract birds which may add to aviation hazards and this matter should be examined.

In the light of this carefully formulated advice, the GAAC is appalled at the Applicant's failure to respond to this critical aviation safety issue.

The Overarching National Policy Statement – EN1 is quite clear. The following extracts emphasise the importance of aviation, including general aviation and including unlicensed aerodromes and embrace the range of social and economic activities that take place.

5.5.1 All aerodromes, covering civil and military activities, as well as aviation technical sites, meteorological radars and other types of defence interests (both onshore and offshore) can be affected by new energy development.

5.5.2 Collaboration and co-existence between aviation, defence and energy industry stakeholders should be strived for to ensure scenarios such that neither is unduly compromised.

5.5.5 UK airspace is important for both civilian and military aviation interests. 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. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy infrastructure developers essential for net zero. Aerodromes can have important economic and social benefits, particularly at the regional and local level, but their needs must be balanced with the urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits.

5.5.12 The CAA's CAP 738 sets out that all licensed aerodromes are required to ensure they have a system in place to safeguard their aerodrome against the growth of obstacles or activities that may present a hazard to aircraft operations.

5.5.14 The DfT/ODPM Circular 01/2003196 and CAA guidance also recommends that the operators of aerodromes which are not officially safeguarded should take steps to protect their aerodrome from the possible effects of development by establishing an agreed consultation procedure between themselves and the LPAs.

5.5.16 The CAA makes clear that the responsibility for the safeguarding of General Aviation aerodromes lies with the aerodrome operator.

5.5.49 The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.

5.5.50 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 and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.

5.5.59 Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether:

.....it would cause harm to aerodromes' training....

Glint and Glare is an extremely important, and well known, risk associated with the presence of solar panels. It is particularly pertinent to the nature of the activity at Tibenham Airfield where the predominant activity, gliding, does not generate the same type of aviation movement as is to be expected where the activity is predominantly associated with fixed wing aircraft. Other safety issues for general aviation created by

solar schemes include thermal updraughts, bird strike and loss of land currently available for an engine failure or emergency landing.

It is therefore not acceptable to suggest that this can be scoped out (paragraph 5.1.1) of the Environmental Impact Assessment (EIA) Scoping Report January 2025. In addition, page 17 of the Phase One Consultation Summary Report does not adequately explain or justify the proposal to address Glint and Glare in the Preliminary Environmental Information Report (PEIR).

Aviation safety is a critical issue. Actions which endanger aviation safety are contrary to the provisions of the Air Navigation Order – underlining its criticality. The Civil Aviation Authority, CAP 793, ‘Safe Operating Practices at Unlicensed Aerodromes’ (Chapter 1, Paragraph 4) makes clear that where flying training is taking place, as it does at Tibenham Aerodrome, ‘...*additional safety measures should be considered.*’

The assertion that the proposed development is ‘*not anticipated*’ to result in significant effects (Table 5.4 of the EIA Scoping Report) is completely unsubstantiated.

This table cross-refers to Section 5.7 which sets out some **subjective** and somewhat **contradictory** assertions.

Paragraph 5.7.5 and Table 5.5 refers to ‘*non-licensed*’ aerodromes. There is no such term as ‘non-licensed’. The aerodromes may be ‘*unlicensed*’ but the implicit message being conveyed here of ‘unimportant’ is misplaced.

For the avoidance of doubt, aviation safety standards are the same whether an airfield is licensed or unlicensed. The licensing relates to the nature of the aerodrome and the safety of those in the air is equally important at licensed or unlicensed aerodromes. Licensing today is normally more prevalent where passenger activity takes place. Unlicensed does not permit safety standards to be slackened or avoided.

Often, where pilot training takes place, safety standards need to be more rigorously imposed and adhered to.

At this point in the application process, the Applicant should be applying the Precautionary Principle at every stage, not endeavouring to avoid properly addressing the potential impact of the proposed development on aviation safety.

Table 5.5 refers to Tibenham as ‘*utilised*’ by general aviation and gliders. This pejorative description is entirely inappropriate. Tibenham Airfield is specifically recognised by Sport England as a Significant Area for Sport (SASP) of National Importance for Gliding.

The prospective developer must give full consideration to the recreational value of the gliding aerodrome in line with EN1.

Table 5.5 also refers to Tibenham being ‘1.0km to the west of sub-Site 1A’. This is extremely close.

Take off and landing operations at a gliding aerodrome take place on a very regular basis over quadrant areas within 3km of the end of each runway.

In particular, due to the proximity of Priory Farm Airstrip (referred to by the Applicant as ‘Tibenham Priory Airstrip’) to the west of Tibenham airfield, a proportion of all Norfolk Gliding Club circuits are flown to the east to about 3km from the runway.

The mix of gliders and powered aircraft widens the area over which these circuits are flown and adds to the north/south transit traffic using the railway as a navigational aid. In particular, East Pye Site 1 and the adjoining Pathfinder Clean Energy Station Road site are within 2km of runway 26 and runway 33 thresholds.

Beyond that the report fails to consider the extent of current aerial activity above a wide swathe of the Application site – relating to aircraft travelling towards and taking off from the aerodrome and travelling in any direction in addition to regular gliding activity, competitions and the arrival of visitors.

Paragraph 5.7.9 refers to ‘common existing sources of glint and glare’. These are not detailed. However, in this **very rural** landscape these are few and far between.

The proposed extensive areas of dense solar panels (and their orientation and proximity to Tibenham Airfield) would introduce a completely new industrial activity, alien to the nature of the existing farmland and the significant change of the character and nature of this must be properly and fully evaluated.

Paragraph 5.7.10 states there is no legislation related to glint and glare. Pager Power may have produced guidance (paragraph 5.7.16) but that is the company’s own document and this has not been approved by any body or organization in an attempt to give it credibility in assessing the impacts of this proposed development.

The extract from NPS -EN3 is correct – the potential impact of glint and glare on... aviation infrastructure (including aircraft departure and arrival flight paths) SHOULD be assessed.

It should also be noted that the CAA CAST guidance makes very clear that all potential risks to aviation safety should be fully examined.

Paragraphs 5.7.21 – 5.7.25 seem to be suggesting that the Applicant will be able to demonstrate that there will be no adverse impacts on aviation safety and therefore the issue should be scoped out.

That is not how Environmental Impact Assessment (EIA) is undertaken.

The scope sets out the issues to be addressed. The issues must be fully evaluated. An assertion in the absence of proper investigation does not fulfil the obligations of the EIA process.

The reference to the FAA in paragraph 5.7.21 effectively underlines the need for individual, dedicated assessments for every scheme to be undertaken.

For the avoidance of doubt, despite having been provided with a significant amount of information, Pager Power does not appear to have undertaken any dedicated technical work in connection with this proposal. It demonstrates no knowledge of the nature and scale of the flying operations at Tibenham Aerodrome. It has undertaken no risk assessment.

The suggestions for 'solutions' in paragraphs 5.7.22 are irrelevant and have no meaning in the absence of understanding, description and analysis of the baseline situation and full appraisal of the potential risks, impacts and ramifications of the proposed development. The issues have been explained to the Applicant in meetings (including one in January 2025) at which attendees accepted that there is a problem but this has not led to any alteration to the scheme.

The Scoping Report at paragraph 5.7.28 pre-dates the meeting referred to above.

To underline this point and demonstrate that the assertions above are correct, paragraphs 5.7.26 and 5.7.27 do refer to 'cumulative' effects will be assessed in the ES. The cumulative effects can only be assessed when each element of the potential effects has been fully evaluated.

The suggestion in paragraphs 5.7.26 and 5.7.27 would clearly be impossible to address in the absence of a thorough and professional description, analysis and risk assessment of the potential for the proposed development to generate risk and harm to the users of Tibenham Airfield.

The third bullet point of paragraph 5.7.24 does make tangential reference to impacts on airfields, which supports our points above.

We therefore agree that the cumulative effects must be considered **but** that is dependent on full assessment of the risks to aviation safety generated by the proposed development.

Paragraph 5.7.25 introduces further confusion and contradiction in the Applicant's position!

Until effects are properly investigated it is impossible to suggest they are '*readily mitigated*'

If a '*detailed Glint and Glare assessment will be undertaken*' (which seems to contradict points highlighted above) it should be a part of the ES – it cannot be scoped out.

It is respectfully suggested that the statements about scoping in or out, the severity of impacts and means of mitigation might have amended during the production of this report which is now reflected in contradictions. A further contradiction is noted in Table 5.8 in relation to Tourism and the references to glint and glare affecting flying activities.

The clear position of the GAAC is that not only does glint and glare but also thermal updrafts and a reduction in safety due to the change of use of land from farmland to industrial use, individually and cumulatively (paragraphs 5.7.26 – 5.7.27) could cause grave safety risks to aviation and adverse effects on recreational and socio-economic issues of importance.

All three of these issues should be fully and properly addressed in the Applicant's Environmental Impact Assessment.

We note comments in Section 5.11 diminishing the importance of socio-economic issues. If the development were to proceed, the nature and range of aviation operations at Tibenham could be limited to the detriment of this important training, sport and recreational hub. This would be contrary to Government policy for aviation and sport. The Applicant must take full account of these in relation to the aviation activity that will be affected by this proposed development.

The GAAC and affected aerodromes are able and willing to assist the Applicant with relevant site-specific information.

There are two main justifications for this:

- a. The aviation safety related issues are technically complex and the continuing safety of the well-established and important Tibenham Gliding Site is reliant upon full and proper appraisal and such appraisal may require substantive modifications to the proposals. These are material and significant issues and the rigor of the EIA process is fully justified to assess these impacts and address mitigation where necessary.

- b. The justification put forward by the Applicant that this issue does warrant inclusion within the EIA is contradictory. In some statements the Applicant appears to agree that it should be scoped in; others suggest otherwise. This inconsistency is confusing and unhelpful and, in accordance with the Precautionary Principle, the logical position that this matter is included in the EIA process.

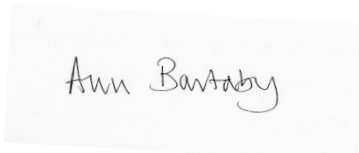
In summary, no cogent case has been made to 'scope out' aviation safety related matters from the Environmental Statement. We appreciate that glint and glare is, on occasion, scoped out of an EIA.

The predominant issue referred to by the Applicant is glint and glare (although as explained this has not been undertaken properly). However, other safety critical issues including thermal updrafts, loss of emergency landing areas and bird strikes are highly significant and should have been and should now be scoped in to the EIA.

This scheme generates significant aviation safety concerns which clearly warrant full, detailed, comprehensive and professional examination in the Environmental Impact Assessment process so as *inter alia*, properly to address necessary mitigation.

If you have any queries, please do not hesitate to contact me.

Yours sincerely



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Head of Planning

cc: Matthew Wilkins, Chairman, GAAC

Appendix – Salient Policy issues as set out in December 2024

The National Planning Policy Framework (NPPF) contains policies to support General Aviation.

Paragraph 111(f), states that planning policies should *'...recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy.'*

The NPPF goes on to specifically protect and support *'recreation grounds'* in paragraphs 88 and 96.

General Aviation airfields inter alia have a recreational function. Sport England recognises all forms of general aviation as 'sports' and airfields are therefore defined as 'sports venues'. General Aviation Airfields are therefore classified as recreational assets.

A wide range of other Government policies and statements underline the importance of aviation, aviation related sports and recreational activities.

The South Norfolk Development Management DPD at DM 3.15 also supports the retention of recreational space. This is particularly pertinent to Tibenham Airfield, a legacy from

In accordance with the provisions of the National Planning Policy Framework, paragraph 193 (in the most recent July 2024 version), this proposed development would constitute an 'agent of change' which **requires** new development to be effectively integrated with existing businesses and community facilities, such as sports clubs.

Paragraph 193 states *'Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.'*

The Agent of Change principle has been explicitly applied to airfields by virtue of Planning Practice Guidance ID: 30-012-20190722.

Government policy in relation to renewable energy is clear that existing operations, such as those at General Aviation Airfields should not be compromised by renewable energy schemes.

The Overarching National Policy Statement for Energy EN-1, Section 5.5 makes clear that **'All aerodromes...'** should not be unduly compromised by new energy development. I

In accordance with paragraph 5.5.14, Norfolk Gliding Club, the owner of Tibenham Aerodrome has followed best practice and agreed a safeguarding consultation procedure with relevant Local Planning Authorities.

National Policy Statement for Renewable Energy Infrastructure (EN-3) at paragraphs 2.10.158 – 2.10.159 draws specific attention to *'glint and glare'* associated with solar PV panels.



Planning Circular 1/2003 requires aerodrome operators to safeguard their sites. The prospective developer has not addressed this. The Norfolk Gliding Club, in line with this best practice has lodged an aerodrome safeguarding plan with South Norfolk Council and this should be taken into account in consideration of this application.

No account has been taken of the CAA's Combined Aerodrome Safeguarding Team (CAST) guidance note, 'Renewable energy developments: solar photovoltaic developments' which encourages developers to consult with the aerodrome operator in order to understand and address the range of safety issues which a solar energy system may generate.