

Additional Submission  
Relevant Representation 20050600  
On Behalf of Burn Gliding Club

Issue Specific Hearing 1 (ISH1)  
The principle and scope of the Proposed Development

1. It was stated repeatedly in the Hearing that the scheme is driven by grid capacity and that EN-1 and EN-3 allow for grid connectivity to drive [the identification of a site for generating power].
2. However, this is only a partial justification and other factors are also relevant:
  - a. The Applicant's alternative site assessment (ASA) (EN010140-000406-7.1 Planning Statement Appendix 2 – Alternative Site Assessment (ASA)) only considers sites within a 5km radius of Drax. There is no reference to, or consideration of, other potential strategic locations, although as paragraph 2.2.1 makes clear, there is no 'general requirement' to consider alternatives (as set out in EN-1 paragraph 4.3.9)
  - b. Having determined that a site within a 5km radius of Drax is, in some respect, a driver, there is no detailed consideration of other locations within this 5km radius.
  - c. Some other development schemes are shown on Figure 2.6 although this is out of date. For example, ref: 2022/10054 [which should have been either 1004 or 1005] /SCN is out of date. Planning permission was granted for this scheme by application reference number 2023/0128/EIA on 17 April 2024.
  - d. It seems clear that, having chosen the 5km radius of Drax, the Application site has actually been chosen because the land has been offered to the developer.
  - e. Then, the ASA has set aside other constraints.
3. In relation to the factors that the ASA should have addressed, the ExA heard a less than convincing argument on 4 December 2024, about the value of the agricultural land.
4. Burn Airfield is described in Figure 2.2 as a 'Disused Airfield'. There is no other reference to it in the ASA.
5. Paragraph 4.3.15 of EN-1 obliges an Application to provide '*...information about the reasonable alternatives they have studied.*' This ASA does not provide any information about alternatives. The description of the '*Exclusionary and Inclusionary Criteria*' in section 2.8 of the ASA is not consideration of '*alternatives*'.

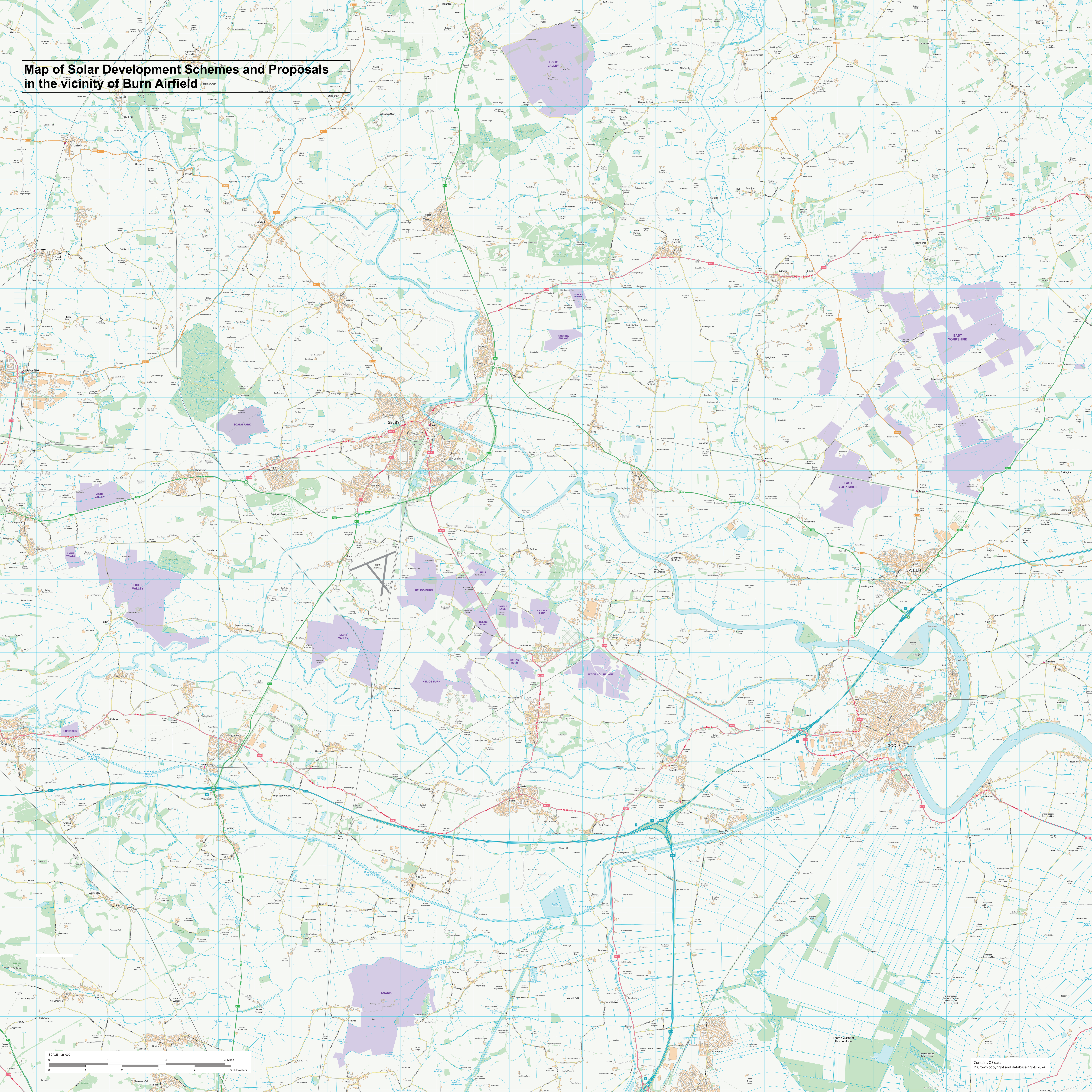
6. Paragraphs 5.5.1-5.5.2 of EN-1 protect all aerodromes and seek to ensure aviation operations are not compromised. Paragraph 5.5.5 elaborates on the importance of aviation operations and their economic and social benefits and paragraph 5.5.50 states:

*'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. It is acknowledged that the Applicant is preparing a Glint and Glare assessment but there is no evidence that other considerations of material importance to aviation are being addressed.
8. Furthermore, the ASA does not address all of the issues highlighted in EN-3, in particular cumulative impacts and residential amenity. Paragraph 2.10.25 acknowledges that applicants '*...may choose a site based on nearby available grid export capacity.*' Then paragraph 2.10.26 goes on to state, '*Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.*'
9. Neither cumulative residential impact nor cumulative aviation impact have been addressed.
10. The attached Plan 'Map of Solar Development in the Vicinity of Burn Airfield' shows existing and proposed solar schemes in the vicinity of Burn Airfield.
11. In the absence of proper consideration of material policy matters, Burn Gliding Club maintains its position that there should be a dedicated Issue Specific Hearing into the impact of the proposed development on the aviation and related recreational use and activities at Burn Airfield.

11 December 2024

**Map of Solar Development Schemes and Proposals  
in the vicinity of Burn Airfield**



SCALE 1:25,000  
0 1 2 3 Miles  
0 1 2 3 Kilometers

Contains OS data  
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