

Interim CAA Guidance - Solar Photovoltaic Systems

BACKGROUND

- 1 Airport interest in solar energy is growing rapidly as a way to reduce operating costs and to demonstrate a commitment to renewable energy and sustainable development. In response, the CAA is seeking to develop its policy on the installation of Solar Photovoltaic (SPV) Systems and their impact on aviation. In doing so, it is reviewing the results of research having been carried out in the United States by the Federal Aviation Administration (FAA) culminating in the publication of [Technical Guidance for Evaluating Solar Technologies on Airports](#) and also reviewing guidance issued by other National Aviation Safety Administrations and Authorities on this subject.
- 2 On completion of the review, the CAA, together with the assistance of other aviation stakeholders, will develop a policy and provide formal guidance material on the installation of SPV, principally on or in the vicinity¹ of licensed aerodromes but will also include guidance on installations away from aerodromes (or 'en-route'²). This document therefore constitutes interim CAA guidance until a formal policy has been developed.

DISCUSSION

- 3 At present the key safety issue is perceived to be the potential for reflection from SPV to cause glare, dazzling pilots or leading them to confuse reflections with aeronautical lights. Whilst permission is not required from the CAA for any individual or group to shine or reflect a light or lights into the sky, SPV developers should be aware of the requirements to comply with the [Air Navigation Order \(ANO\) 2009](#). In particular, developers and Local Planning Authorities (LPA) should be cognisant of the following articles of the ANO with respect to any SPV development regardless of location:
 - Article 137 – Endangering safety of an aircraft.
 - Article 221 – Lights liable to endanger.
 - Article 222 – Lights which dazzle or distract.
- 4 The potential for SPV installations to cause electromagnetic or other interference with aeronautical Communications Navigational and Surveillance equipment (CNS) must be considered by the SPV developer, in coordination with the CAA, the aerodrome Air Traffic Service provider (ATS), the Air Navigation Service Provider (ANSP) and/or NATS and the MoD, as required.

¹ In this context, the term "in the vicinity" refers to officially safeguarded aerodromes noted in the Planning Circulars ([see Paragraph 10](#)) and a distance of up to 15km from the 'Aerodrome Reference Point' or the centre of the longest runway.

² SPV installations proposed further than 15km from an aerodrome are considered "en-route" developments, and may still require consultation with the CAA for an assessment on the impact, if any, to CNS equipment.

- 5 Where SPV systems are installed on structures that, for example, extend above the roofline of tall buildings (either on, or 'off-aerodrome'), or where they are installed in the vertical plane (on plinths or towers), then there may be the potential for creating an obstacle hazard to aircraft and - in addition to the potential for creating turbulence hazard to aircraft - any infringement of the aerodrome Obstacle Limitation Surfaces (OLS) shall also need to be considered by the Aerodrome Licence Holder (ALH).
- 6 For all planned SPV installations it is best practice for the developer to consult with the operators of nearby aerodromes **before** any construction is initiated.
- 7 An ALH, in agreement with their LPA, may wish to initiate procedures so that it is only consulted on SPV planning applications at shorter distances from the aerodrome (for example within a 5 km radius), or at distances that would limit SPV development from within the aircraft operating visual circuit; however, this is at the discretion of the ALH and no CAA approval or endorsement of this decision is necessary.

RECOMMENDATIONS

- 8 It is recommended that, as part of a planning application, the SPV developer provide safety assurance documentation (including risk assessment) regarding the full potential impact of the SPV installation on aviation interests.
- 9 Guidance on safeguarding procedures at CAA licensed aerodromes is published within [CAP 738 Safeguarding of Aerodromes](#) and advice for unlicensed aerodromes is contained within [CAP 793 Safe Operating Practices at Unlicensed Aerodromes](#).
- 10 Where proposed developments in the vicinity of aerodromes require an application for planning permission³ the relevant LPA normally consults aerodrome operators or NATS when aeronautical interests might be affected. This consultation procedure is a statutory obligation in the case of certain major airports, and may include military establishments and certain air traffic surveillance technical sites. These arrangements are explained in [Department for Transport Circular 1/2003](#) and for Scotland, [Scottish Government Circular 2/2003](#).
- 11 In the event of SPV developments proposed under the Electricity Act, the relevant government department should routinely consult with the CAA. There is therefore no requirement for the CAA to be separately consulted for such proposed SPV installations or developments.
- 12 If an installation of SPV systems is planned **on**-aerodrome (i.e. within its licensed boundary) then it is recommended that data on the reflectivity of the solar panel material should be included in any assessment before installation approval can be granted. Although approval for installation is the responsibility of the ALH, as part of a condition of a CAA Aerodrome Licence, the ALH is required to obtain prior consent from CAA Aerodrome Standards Department **before** any work is begun or approval to the developer or LPA is granted, in accordance with the procedures set out in [CAP 791 Procedures for Changes to Aerodrome Infrastructure](#).
- 13 During the installation and associated construction of SPV systems there may also be a need to liaise with nearby aerodromes if cranes are to be used; CAA notification and permission is not required.

³ The CAA is aware of changes to planning legislation that may provide for 'Permitted Development Rights' for certain micro-generation equipment on both domestic and non-domestic property, under the General Permitted Development Order (1995).

- 14 The CAA aims to replace this informal guidance with formal policy in due course and reserves the right to cancel, amend or alter the guidance provided in this document at its discretion upon receipt of new information.
- 15 Further guidance may be obtained from CAA's Aerodrome Standards Department via aerodromes@caa.co.uk.

17 December 2010