

# Solar Photovoltaic Glint and Glare Study

Pegasus Planning Group Limited

Nuneham Solar

March 2024

# **PLANNING SOLUTIONS FOR:**

- Solar
- Telecoms
- Railways
- DefenceBuildings
- Wind
- Airports
- Radar
- Mitigation

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# **ADMINISTRATION PAGE**

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1	February 2024	Initial issue	
2	March 2024	Update to residential properties	
3	March 2024	Minor amendments	

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# **EXECUTIVE SUMMARY**

#### **Report Purpose**

Pager Power has been retained to assess the possible effects of glint and glare from a fixed ground-mounted solar photovoltaic development, located near Nuneham Courtenay, Oxfordshire, UK. This assessment pertains to the possible impact upon road safety, residential amenity, and aviation activity associated with Abingdon Airfield, Drayton St Leonard Airfield, RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield.

#### **Overall Conclusions**

No significant impacts are predicted upon residential amenity, road safety or aviation activity at Abingdon Airfield, Drayton St Leonard Airfield, RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield.

#### **Guidance and Studies**

Guidelines exist in the UK (produced by the Civil Aviation Authority) and in the USA (produced by the Federal Aviation Administration) with respect to solar developments and aviation activity. The UK CAA guidance is relatively high-level and does not prescribe a formal methodology. A specific national guidance policy for determining the impact of glint and glare on road safety and residential amenity has also not been produced to date. Therefore, in the absence of this, Pager Power reviewed more general existing planning guidelines and the available studies (discussed below) in the process of defining its own glint and glare assessment guidance and methodology<sup>1</sup>. This methodology defines the process for determining the impact upon road safety, residential amenity, and aviation activity.

Pager Power's approach is to undertake geometric reflection calculations and, where a solar reflection is predicted, consider the screening (existing and/or proposed) between the receptor and the reflecting solar panels. For aviation activity, where appropriate, solar intensity calculations are undertaken in line with the Sandia National Laboratories' FAA methodology<sup>2</sup>. The scenario in which a solar reflection can occur for all receptors is then identified and discussed, and a comparison is made against the available solar panel reflection studies to determine the overall impact.

The available studies have measured the intensity of reflections from solar panels with respect to other naturally occurring and manmade surfaces. The results show that the reflections produced are of intensity similar to or less than those produced from still water and significantly less than reflections from glass and steel<sup>3</sup>.

<sup>&</sup>lt;sup>1</sup> <u>Pager Power Glint and Glare Guidance</u>, Fourth Edition, September 2022.

<sup>&</sup>lt;sup>2</sup> Formerly mandatory for on-airfield solar developments in the USA under the FAA's interim policy, superseded in 2021 with a policy that effectively requires individual airports to sign off on their on-airfield development as they see fit. <sup>3</sup> SunPower, 2009, SunPower Solar Module Glare and Reflectance (appendix to Solargen Energy, 2010).



#### **Assessment Conclusions – Aviation**

#### Abingdon Airfield

Solar reflections with 'low potential for temporary after-image' ('green' glare) are geometrically possible along the 1-mile splayed approach paths and visual circuits for runways 08/26 and 18/36 at Abingdon Airfield. This is acceptable in accordance with the associated guidance (Appendix D) and industry best practice; therefore, a low impact is predicted and mitigation is not required.

#### **Drayton St Leonard Airfield**

No solar reflections are geometrically possible towards the 1-mile splayed approach paths and visual circuits for runway 06 at Drayton St Leonard Airfield. Therefore, no impact is predicted, and mitigation is not required.

Solar reflections with 'low potential for temporary after-image' ('green' glare) are geometrically possible along the 1-mile splayed approach paths and visual circuits for runway 24 at Drayton St Leonard Airfield. This is acceptable in accordance with the associated guidance (Appendix D) and industry best practice; therefore, a low impact is predicted and mitigation is not required.

#### **Assessment Conclusions – Roads**

Solar reflections are geometrically possible towards a 1.7km section of the assessed A4074.

For 1.6km of the A4074 screening in the form of existing vegetation, buildings and terrain is predicted to significantly obstruct views of reflecting panels for road users travelling along these sections of road. Therefore, no impacts are predicted, and mitigation is not required.

For the remaining 100m section where solar reflections are geometrically possible, unobstructed solar reflections occur outside of the primary field of view (50 degrees either side of the direction of travel). Therefore, a low impact is predicted in accordance with the guidance in Appendix D and mitigation is not recommended.

#### **Assessment Conclusions - Dwellings**

Solar reflections are geometrically possible towards 24 of the 33 identified dwellings. Significant screening of the reflecting panels in the form of existing and proposed vegetation and/or buildings has been identified for all of these dwellings, for which no impact is predicted and mitigation is not required.

### **Assessment Conclusions - High Level Aviation**

Considering the size of the proposed development, its location, and past project experience, the following can be reliably concluded for RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield:

Any solar reflections towards pilots along the approach path towards thresholds 01RH at RAF Benson, 34 at North Moreton Airfield, 30 at Chalgrove Airprot, and 24 at Slay Barn Airfield would have glare intensities no greater than 'low potential for temporary after image'. Considering the associated guidance (Appendix D) and industry best practice pertaining to 2-mile approach paths, it can be concluded that this level of glare is acceptable for these approach paths.



- Any solar reflections will occur outside a pilot's primary field of view (50 degrees either side of the approach bearing) along the approach path towards runway thresholds 19 at RAF Benson, 16 at North Moreton Airfield, 12 at Chalgrove Airprot, and 06 at Slay Barn Airfield. This is acceptable in accordance with the associated guidance and industry best practice.
- Based on the separation distance, relative location of the airfield to the solar development, and the size of the proposed development, reflections towards the air traffic control tower at RAF Benson and Chalgrove Airport are considered unlikely. Furthermore, any such reflections are not expected to be visible to a controller at this range.

Overall, no significant impacts upon aviation activity associated with the identified airfields are predicted, and no detailed modelling is recommended.



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# **ABOUT PAGER POWER**

Pager Power is a dedicated consultancy company based in Suffolk, UK. The company has undertaken projects in 59 countries within Europe, Africa, America, Asia and Australasia.

The company comprises a team of experts to provide technical expertise and guidance on a range of planning issues for large and small developments.

Pager Power was established in 1997. Initially the company focus was on modelling the impact of wind turbines on radar systems. Over the years, the company has expanded into numerous fields including:

- Renewable energy projects;
- Building developments;
- Aviation and telecommunication systems.

Pager Power prides itself on providing comprehensive, understandable and accurate assessments of complex issues in line with national and international standards. This is underpinned by its custom software, longstanding relationships with stakeholders and active role in conferences and research efforts around the world.

Pager Power's assessments withstand legal scrutiny and the company can provide support for a project at any stage.



# **1 INTRODUCTION**

### 1.1 Overview

Pager Power has been retained to assess the possible effects of glint and glare from a fixed ground-mounted solar photovoltaic development, located near Nuneham Courtenay, Oxfordshire, UK. This assessment pertains to the possible impact upon road safety, residential amenity, and aviation activity associated with Abingdon Airfield, Drayton St Leonard Airfield, RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield.

This report contains the following:

- Solar development details;
- Explanation of glint and glare;
- Overview of relevant guidance and studies;
- Assessment methodology;
- Identification of receptors;
- Glint and glare assessment for identified receptors;
- Results discussion;
- High-level aviation considerations;
- Conclusions and recommendations.

#### **1.2 Pager Power's Experience**

Pager Power has undertaken over 1,300 Glint and Glare assessments in the UK and internationally. The studies have included assessment of civil and military aerodromes, railway infrastructure and other ground-based receptors including roads and dwellings.

#### 1.3 Glint and Glare Definition

The definition<sup>4</sup> of glint and glare is as follows:

- Glint a momentary flash of bright light typically received by moving receptors or from moving reflectors;
- Glare a continuous source of bright light typically received by static receptors or from large reflective surfaces.

The term 'solar reflection' is used in this report to refer to both reflection types i.e. glint and glare.

<sup>&</sup>lt;sup>4</sup> These definitions are aligned with those presented within the National Policy Statement for Renewable Energy Infrastructure (EN-3) – published by the Department for Energy Security & Net Zero in Deecember 2023 and the Federal Aviation Administration in the USA.



# 2 SOLAR DEVELOPMENT LOCATION AND ASSESSMENT DETAILS

## 2.1 Overview

The following sections present key details pertaining to the proposed development and this assessment.

## 2.2 Proposed Development Site Layout

Figure 1 below shows the site layout<sup>5</sup> for the proposed development. Solar panels are shown by the grey areas.

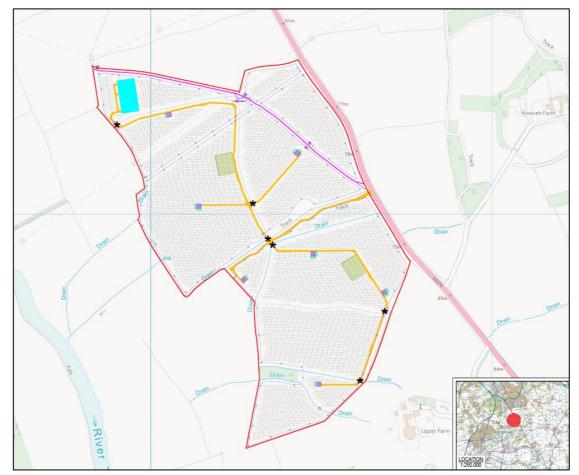


Figure 1 Site layout

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<sup>&</sup>lt;sup>5</sup> Source: FIG4 - 04531-RES-LAY-DR-PT-003 - Planning Layout

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## 2.3 Reflector Area

The bounding coordinates for the proposed development have been extrapolated from the site plans. The data can be found in Appendix G. Figure 2 below shows the assessed reflector area that has been used for modelling purposes.



Figure 2 Assessed reflector area

### 2.4 Resolution

The Pager Power model has used a resolution of 15m for this assessment. This means that a geometric calculation is undertaken for each identified receptor every 15m from within the defined areas. This resolution is sufficiently high to maximise the accuracy of the results – increasing the resolution further would not significantly change the modelling output. If a reflection is experienced from an assessed panel location, then it is likely that a reflection will be viewable from similarly located panels within the proposed solar development.

## 2.5 Solar Panel Technical Information

The technical information of the modelled solar panels used in this assessment is summarised below:

- Azimuth angles<sup>6</sup>: 180° (south-facing panels);
- Elevation (tilt<sup>7</sup>) angle: 22°;
- Assessed centre<sup>8</sup> height: 2.175m above ground level.

<sup>&</sup>lt;sup>6</sup> Direction the panels are facing relative to True North (0°)

<sup>&</sup>lt;sup>7</sup> Above horizontal

<sup>&</sup>lt;sup>8</sup> Relative to a minimum (0.75m) and maximum (3.6m) height above ground level



# 3 GLINT AND GLARE ASSESSMENT METHODOLOGY

## 3.1 Guidance and Studies

Appendices A and B present a review of relevant guidance and independent studies with regard to glint and glare issues from solar panels. The overall conclusions from the available studies are as follows:

- Specular reflections of the Sun from solar panels are possible;
- The measured intensity of a reflection from solar panels can vary from 2% to 30% depending on the angle of incidence;
- Published guidance shows that the intensity of solar reflections from solar panels are equal to or less than those from water. It also shows that reflections from solar panels are significantly less intense than many other reflective surfaces, which are common in an outdoor environment.

## 3.2 Background

Details of the Sun's movements and solar reflections are presented in Appendix C.

## 3.3 Methodology

#### 3.3.1 Pager Power's Methodology

The glint and glare assessment methodology has been derived from the information provided to Pager Power through consultation with stakeholders and by reviewing the available guidance and studies. The methodology for this glint and glare assessment is as follows:

- Identify receptors in the area surrounding the solar development;
- Consider direct solar reflections from the solar development towards the identified receptors by undertaking geometric calculations;
- Consider the visibility of the panels from the receptor's location. If the panels are not visible from the receptor then no reflection can occur;
- Based on the results of the geometric calculations, determine whether a reflection can occur, and if so, at what time it will occur;
- Consider both the solar reflection from the solar development and the location of the direct sunlight with respect to the receptor's position;
- Consider the solar reflection with respect to the published studies and guidance including intensity calculations where appropriate;
- Determine whether a significant detrimental impact is expected in line with the process presented in Appendix D.



#### 3.3.2 Sandia National Laboratories' Methodology

Sandia National Laboratories developed the Solar Glare Hazard Analysis Tool (SGHAT) which is no longer freely available however it is now developed by Forge Solar. Pager Power uses this model where required for aviation receptors. Whilst strictly applicable in the USA and to solar photovoltaic developments only, the methodology is widely used by aviation stakeholders internationally.

## 3.4 Assessment Methodology and Limitations

Further technical details regarding the methodology of the geometric calculations and limitations are presented in Appendix E and F.



# **4 IDENTIFICATION OF RECEPTORS**

## 4.1 Aviation Receptors

The following subsections present the relevant data and receptors associated with Abingdon Airfield and Drayton St Leonard Airfield.

#### 4.1.1 Abingdon Airfield Information

Abingdon Airfield is an unlicensed aerodrome and is not understood to have an Air Traffic Control (ATC) Tower. The operational runway details are presented below:

- 08/26 1,463m x 46m (Asphalt);
- 18/26 1,829m x 46m (Asphalt).

Abingdon Airfield is approximately 5.6km west of the closest panel area pertaining to the proposed development. The location relative to the proposed development is shown in Figure 4

#### 4.1.2 Drayton St Leonard Airfield Information

Drayton St Leonard Airfield is an unlicensed aerodrome and is not understood to have an ATC Tower. The operational runway details are presented below:

• 06/24 - 390m x 14m (Grass).

Drayton St Leonard Airfield is approximately 6.54km southeast of the closest panel area pertaining to the proposed development. The location relative to the proposed development is shown in Figure 4.

#### 4.1.3 Runway Approach Paths and Visual Circuits

The identified airfields are general aviation (GA) airfields where aviation activity is dynamic and does not necessarily follow the typical approaches / flight paths of a licensed aerodrome. It is not possible to assess every single location an aircraft may be situated in flight around an aerodrome; however, it is possible to assess the most frequently flown flight paths and the most critical stages of flight, which would cover most, or all, of the relevant locations.

As such, Pager Power's methodology is to assess whether a solar reflection can be experienced on a 5-degree splayed approach path based on the extended runway centreline, and the final sections of the visual circuits and joins on approach to the corresponding runway thresholds.

The assessed receptors are based on the following characteristics:

- 1-mile approach path with a splay angle of 5 degrees, considering 2.5 degrees either side of the extended runway centreline;
- A descent angle of 5 degrees;
- Circuit width of 1 nautical mile;
- Maximum altitude of 500 feet above the aerodrome height.

Figures 3 and 4 on the following pages illustrate the splayed approach and final sections of the visual circuits.



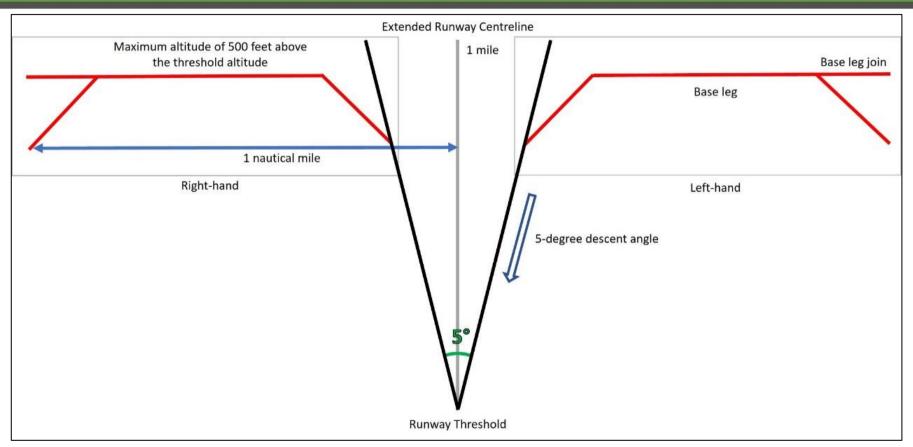


Figure 3 Splayed approach and final sections of visual circuits - GA airfields





Figure 4 Receptors for Rectory Farm Airfield, Gransden Lodge Glider Airfield, and Little Gransden Airfield



## 4.2 Ground Based Receptors Overview

The following section presents the relevant receptors assessed within this report. Terrain data has been interpolated based on Ordnance Survey (OS) 50 Digital Terrain Model (DTM) data. The receptor details for all receptors are presented in Appendix G.

There is no formal guidance with regard to the maximum distance at which glint and glare should be assessed. From a technical perspective, there is no maximum distance for potential reflections. The significance of a reflection however decreases with distance because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases. Terrain and shielding by vegetation are also more likely to obstruct an observer's view at longer distances.

The above parameters and industry experience over a significant number of glint and glare assessments undertaken, shows that a 1km assessment area from the proposed development is considered appropriate for glint and glare effects on road users and dwellings. Reflections towards ground-based receptors located further north than any proposed panel are highly unlikely<sup>9</sup>. Therefore, receptors north of the most northern panel areas have not been modelled.

Potential receptors within the associated assessment area are identified based on mapping and aerial photography of the region. The initial judgement is made based on high-level consideration of aerial photography and mapping i.e. receptors are excluded if it is clear from the outset that no visibility would be possible. A more detailed assessment is made if the modelling reveals a reflection would be geometrically possible.

The 1km assessment area is outlined in green in Figure 5 on the following page.

<sup>&</sup>lt;sup>9</sup> For fixed, south-facing panels at this latitude.





Figure 5 Assessment area

### 4.3 Road Receptors

#### 4.3.1 Overview

Road types can generally be categorised as:

- Major National Typically a road with a minimum of two carriageways with a maximum speed limit of up to 70mph. These roads typically have fast moving vehicles with busy traffic;
- National Typically a road with a one or more carriageways with a maximum speed limit 60mph or 70mph. These roads typically have fast moving vehicles with moderate to busy traffic density;
- Regional Typically a single carriageway with a maximum speed limit of up to 60mph. The speed of vehicles will vary with a typical traffic density of low to moderate;
- Local Typically roads and lanes with the lowest traffic densities. Speed limits vary.

Technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low. Any solar reflections from the proposed development that are experienced by a road user along a local road would be considered low impact in the worst-case in accordance with the guidance presented in Appendix D. The analysis has also considered major national, national, and regional roads that:

- Are within the one-kilometre assessment area;
- Have a potential view of the panels.



#### 4.3.2 Identified Road Receptors

A 1.8km section of the A4074 has been identified within the assessment area with potential views of the reflecting panel area.

Figure 6 on the following page shows the road receptors modelled for the A4074. The receptors are placed approximately 100m apart along these roads. A height of 1.5 metres above ground level has been taken as the typical eye-level of a road user<sup>10</sup>.

<sup>&</sup>lt;sup>10</sup> This height is used for modelling purposes. Small changes to this height are not significant, and views for elevated drivers are also considered where appropriate



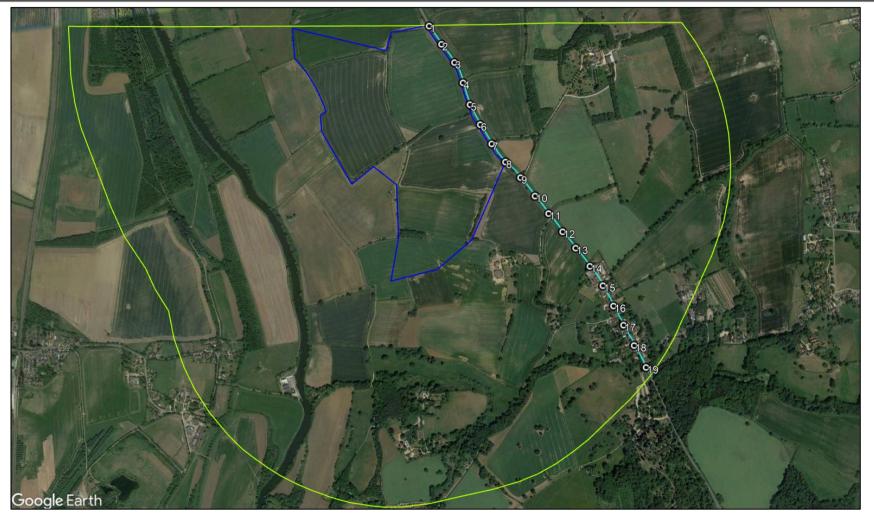


Figure 6 A4074 road receptors

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## 4.4 Dwelling Receptors

#### 4.4.1 Overview

The analysis has considered dwellings that:

- Are within the one-kilometre assessment area; and
- Have a potential view of the panels.

In residential areas with multiple layers of dwellings, only the outer dwellings have been considered for assessment. This is because they will mostly obscure views of the solar panels to the dwellings behind them, which will therefore not be impacted by the proposed development because line of sight will be removed, or they will experience comparable effects to the closest assessed dwelling.

Additionally, in some cases, a single receptor point may be used to represent a small number of separate addresses. In such cases, the results for the receptor will be representative of the adjacent observer locations, such that the overall level of effect in each area is captured reliably.

#### 4.4.2 Identified Dwelling Receptors

The assessed dwelling receptors are shown in Figure 7 on the following page. In total, 33 receptors have been assessed. A 1.8m height above ground level is used in the modelling to simulate the typical viewing height of an observer on the ground floor<sup>11</sup>.

<sup>&</sup>lt;sup>11</sup>Small changes to this height are not significant, and views above the ground floor are considered where appropriate.





Figure 7 Dwelling receptors

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# 5 GEOMETRIC ASSESSMENT RESULTS AND DISCUSSION

## 5.1 Overview

The following sub-sections summarise the results of the assessment:

- The key considerations for each receptor type and the criteria determining the assessment process for each receptor (Appendix D);
- Geometric results of the assessment based solely on bare-earth terrain i.e., without consideration of screening in the form of buildings, dwellings, (existing or proposed) vegetation, and/or terrain. The modelling output for receptors (Appendix H) presents the precise predicted times and the reflecting panel areas;
- Whether a reflection will be experienced in practice. When determining the visibility of the reflecting panels for an observer, a conservative review of the available imagery, landscape strategy plan, google earth viewshed (high-level terrain analysis), and/or site photography (if available) is undertaken, whereby it is assumed views of the panels are possible if it cannot be reliably determined that existing screening will remove effects;
- The impact significance;
- The desk-based review of the available imagery, where appropriate. Detailed modelling outputs showing the precise predicted times and the reflecting panel areas are shown in Appendix H.

### 5.2 Geometric Assessment Results - Aviation Results

#### 5.2.1 Glare Intensity Categorisation

The Pager Power and Forge models have been used to determine whether reflections are possible for aviation receptors. Intensity calculations (Forge Model) in line with the Sandia National Laboratories methodology have been undertaken. These calculations are routinely required for solar photovoltaic developments on or near aerodromes. The intensity model calculates the expected intensity of a reflection with respect to the potential for an after-image (or worse) occurring. The designation used by the model is presented in Table 1 below along with the associated colour coding.

Coding Used	Intensity Key		
Glare beyond 50°	'Glare beyond 50 degrees from pilot's field-of-view'		
'Green'	'Low potential for temporary after-image'		
'Yellow'	'Potential for temporary after-image'		
'Red' 'Potential for permanent eye damage'			

Table 1 Glare intensity designation



This coding has been used in the table where a reflection has been calculated and is in accordance with Sandia National Laboratories' methodology.

In addition, the intensity model allows for the assessment of a variety of solar panel surface materials. In the first instance, a surface material of 'smooth glass with an anti-reflective coating' is assessed. Other surfaces that could be modelled include:

- Smooth glass without anti-reflective coating;
- Light textured glass without an anti-reflective coating;
- Light textured glass with an anti-reflective coating; or
- Deeply textured glass.

Appendix H presents the results charts showing specific times and dates.

#### 5.2.2 Key Considerations – Approach Paths and Visual Circuits

For the runway approach paths and visual circuits, the key considerations are:

- Whether a reflection is predicted to be experienced in practice;
- The location of glare relative to a pilot's primary field of view (50 degrees either side of the approach bearing);
- The intensity of glare for the solar reflections:
  - Glare with 'low potential for temporary after-image' (green glare);
  - Glare with 'potential for temporary after-image' (yellow glare);
  - Glare with 'potential for permanent eye damage' (red glare).
- Whether a reflection is predicted to be operationally significant in practice or not.

Where no solar reflections are geometrically possible or where solar reflections are predicted to be significantly screened, no impact is predicted, and mitigation is not required.

Where solar reflections are of an intensity no greater than 'low potential for temporary afterimage' (green glare) or occur outside of a pilot's primary field-of-view (50 degrees either side of the runway approach relative to the runway threshold), the impact significance is low, and mitigation is not required.

Glare with 'potential for a temporary after-image' (yellow glare) was formerly not permissible under the interim guidance provided by the Federal Aviation Administration in the USA<sup>12</sup> for onairfield solar. Pager Power recommends a pragmatic approach whereby instances of 'yellow' glare are evaluated in a technical and operational context. Where solar reflections are of an intensity no greater than 'low potential for temporary after-image' expert assessment of the following factors is required to determine the impact significance<sup>13</sup>:

<sup>&</sup>lt;sup>12</sup> This FAA guidance from 2013 has since been superseded by the FAA guidance in 2021 whereby airports are tasked with determining safety requirements themselves.

<sup>&</sup>lt;sup>13</sup> This approach taken is reflective of the changes made in the 2021 FAA guidance; however, it should be noted that this guidance states that it is up to the airport to determine the safety requirements themselves. Therefore, an airport may not accept any yellow glare towards approach paths.



- The likely traffic volumes and level of safeguarding at the aerodrome licensed aerodromes typically have higher traffic volumes and are formally safeguarded;
- The time of day at which glare is predicted and whether the aerodrome will be operational such that pilots can be on the approach at these times;
- The duration of any predicted glare glare that occurs for low durations throughout the year is less likely to be experienced than glare that occurs for longer durations throughout the year;
- The location and size of the reflecting panel area relative to a pilot's primary field-ofview;
- The location of the source of glare relative to the position of the Sun at the times and dates in which solar reflections are geometrically possible effects that coincide with direct sunlight appear less prominent than those that do not;
- The level of predicted effect relative to existing sources of glare a solar reflection is less noticeable by pilots when there are existing reflective surfaces in the surrounding environment.

Following consideration of these factors, where the solar reflection is not deemed significant, a low impact is predicted, and mitigation is not recommended; however, consultation with the aerodrome is recommended to understand their position along with any feedback or comments regarding the proposed development.

Where the solar reflection is deemed significant, the impact significance is moderate, and mitigation is recommended. Where solar reflections are of an intensity greater than 'potential for temporary after-image', the impact significance is high, and mitigation is required.

In all cases, however, consultation with the aerodrome is recommended to understand their position pertaining to solar reflections towards the ATC Tower (if present) or approach paths, along with any feedback or comments regarding the proposed development.

#### 5.2.3 Assessment Results

Tables 2-3 on the following pages present the following:

- Geometric modelling results;
- Glare intensity;
- Comment and predicted impact significance.

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Approach/Circuit	Geometric Modelling Result	Glare Intensity	Comment
Runway 18 1-Mile Splayed Approach	Solar reflections occur along small sections of the approach paths		Solar reflections with 'green' glare intensities occur outside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 18 Visual Circuits	Solar reflections occur along the right and left hand visual circuits		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 36 1-Mile Splayed Approach	Solar reflections occur along small sections of the approach paths		Solar reflections with 'green' glare intensities occur outside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 36 Visual Circuits	Solar reflections occur along the right and left hand visual circuits		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice

#### 5.2.3.1 Abingdon Airfield



Approach/Circuit	Geometric Modelling Result	Glare Intensity	Comment
Runway 08 1-Mile Splayed Approach	Solar reflections occur along sections of the approach paths		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 08 Visual Circuits	Solar reflections occur along the right and left hand visual circuits		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 26 1-Mile Splayed Approach	Solar reflections occur along small sections of the approach paths		Solar reflections with 'green' glare intensities occur outside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 26 Visual Circuits	Solar reflections occur along sections of the right and left hand visual circuits		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice

Table 2 Geometric Assessment Results - Abingdon Airfield Aviation Receptors

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Approach/Circuit	Geometric Modelling Result	Glare Intensity	Comment
Runway 06 1-Mile Splayed Approach	No solar reflections geometrically possible	N/A	No impact predicted No further analysis required
Runway 06 Visual Circuits	in the solution second the solution of the sol		No impact predicted No further analysis required
Runway 24 1-Mile Splayed Approach	Solar reflections occur along the approach paths		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice
Runway 24 Visual Circuits	Solar reflections occur along the right and left hand visual circuits		Solar reflections with 'green' glare intensities occur inside a pilot's primary field-of-view Glare intensity is acceptable in accordance with the associated guidance and industry best practice

#### 5.2.3.2 Drayton St Leonard Airfield

Table 3 Geometric Assessment Results - Drayton St Leonard Aviation Receptors



## 5.3 Geometric Assessment Results - Road Receptors

#### 5.3.1 Overview

The key considerations for road users along major national, national, and regional roads are:

- Whether a reflection is predicted to be experienced in practice; and
- The location of the reflecting panel relative to a road user's direction of travel.

Where solar reflections are not geometrically possible, or the reflecting panels are predicted to be significantly obstructed from view, no impact is predicted, and mitigation is not required.

Where solar reflections originate from outside of a road user's primary horizontal field of view (50 degrees either side relative to the direction of travel), or the closest reflecting panel is over 1km from the road user, the impact significance is low, and mitigation is not recommended.

Where solar reflections are predicted to be experienced from inside of a road user's primary field of view, expert assessment of the following factors is required to determine the impact significance and mitigation requirement:

- Whether the solar reflection originates from directly in front of a road user a solar reflection that is directly in front of a road user is more hazardous than a solar reflection to one side;
- Whether visibility is likely for elevated drivers (relevant to dual carriageways and motorways<sup>14</sup>);
- The separation distance to the panel area larger separation distances reduce the proportion of an observer's field of view that is affected by glare;
- Whether a solar reflection is fleeting in nature a momentary reflection is less significant than a sustained source of glare;
- The position of the Sun effects that coincide with direct sunlight appear less prominent than those that do not, as the Sun is a far more significant source of light.

Following consideration of these factors, where the solar reflection is not deemed significant, a low impact is predicted, and mitigation is not recommended. Where the solar reflection is deemed significant, the impact significance is moderate, and mitigation is recommended.

Where solar reflections originate from directly in front of a road user and there are no mitigating factors, the impact significance is high, and mitigation is required.

#### 5.3.2 Geometric Results and Discussion

Table 4 on the following page presents the following:

- Geometric modelling results (bare earth terrain i.e. without consideration of screening);
- Desk-based review of identified screening;
- Consideration of any relevant mitigating factors present, where appropriate;
- Predicted impact significance.

<sup>&</sup>lt;sup>14</sup> There is typically a higher density of elevated drivers (such as HGVs) along dual carriageways and motorways compared to other types of road.



Road Receptor	Geometric Modelling Results (screening not considered)	Identified Screening and Predicted Visibility (desk-based review)	Whether reflections occur inside a road user's primary FOV (with consideration of screening) <sup>15</sup>	Mitigating Factors	Predicted Impact Classification	Mitigation Recommended/ Required?
1	Solar reflections are <u>not</u> geometrically possible	N/A	N/A	N/A	No impact	No
2-3	Solar reflections are <u>geometrically possible</u> Solar reflections occur <u>inside</u> a road user's primary FOV.	Existing vegetation. Predicted to significantly obstruct views of reflecting panels such that view are <u>not possible</u> in practice.	N/A	N/A	No impact	No
4	Solar reflections are geometrically possible Solar reflections occur outside a road user's primary FOV.	N/A	N/A	N/A	Low impact	No

<sup>15</sup> Assessment scenario may include an initial conservative qualitative consideration of screening. The reflecting area of the solar development may be partially screened such that it does not meet the key criteria i.e. whether the solar reflection occurs within a road users' main field of view.



Road Receptor	Geometric Modelling Results (screening not considered)	Identified Screening and Predicted Visibility (desk-based review)	Whether reflections occur inside a road user's primary FOV (with consideration of screening) <sup>15</sup>	Mitigating Factors	Predicted Impact Classification	Mitigation Recommended/ Required?
5-19	Solar reflections are geometrically possible Solar reflections occur <u>inside</u> a road user's primary FOV.	Existing vegetation, terrain and building screening. <sup>16</sup> Predicted to significantly obstruct views of reflecting panels such that view are <u>not possible</u> in practice.	N/A	N/A	No impact	No

 Table 4 Geometric Modelling Results and Predicted Impact Classification for the A4074

#### 5.3.3 Desk-Based Review of Available Imagery

A desk-based review of the available imagery for the A4074 is presented in Figures 8-12 on the following pages. The cumulative reflecting panel areas are indicated by regions of yellow. The identified screening in the form of existing vegetation, buildings and terrain is outlined in orange.

<sup>&</sup>lt;sup>16</sup> The height of the identified screening for receptors 5-7 has been assessed in relation to the vehicles present in the available imagery. This screening should be maintained to the appropriate height and any reduction in height may change the impact classification.



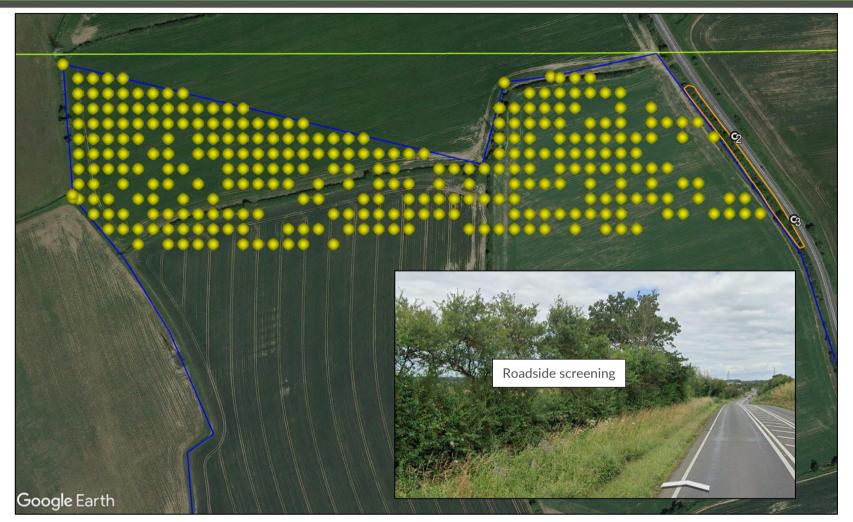


Figure 8 Screening for road receptors 2-3 with street view insert from receptor 3

Solar Photovoltaic Glint and Glare Study



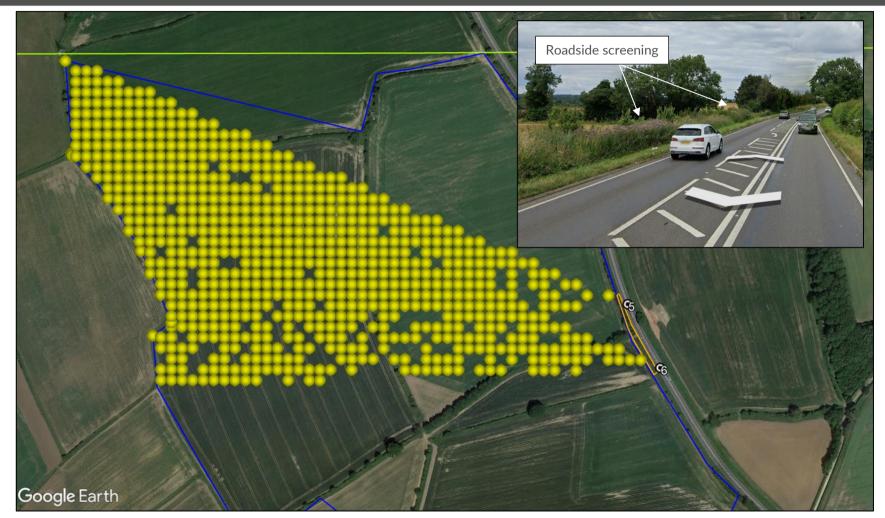


Figure 9 Screening for road receptors 5-6 with street view insert from receptor 6

Solar Photovoltaic Glint and Glare Study



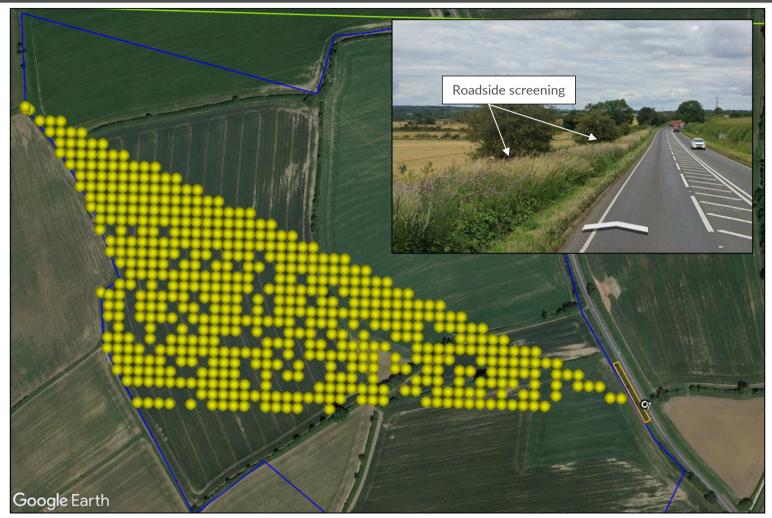


Figure 10 Screening for road receptors 7 with street view insert from receptor 7





Figure 11 Screening for road receptors 8-14 with street view inserts from receptors 10 and 12





Figure 12 Screening for road receptors 15-19 with street view inserts from receptor 15



# 5.4 Geometric Assessment Results – Dwelling Receptors

#### 5.4.1 Overview

The key considerations for residential dwellings are:

- Whether a reflection is predicted to be experienced in practice;
- The duration of the predicted effects, relative to thresholds of:
  - o 3 months per year;
  - 60 minutes on any given day.

Where solar reflections are not geometrically possible, or the reflecting panels are predicted to be significantly obstructed from view, no impact is predicted, and mitigation is not required.

Where effects occur for <u>less</u> than three months per year and <u>less</u> than 60 minutes on any given day, or the closest reflecting panel is over 1km from the dwelling, the impact significance is low, and mitigation is not recommended.

Where reflections are predicted to be experienced for <u>more</u> than three months per year <u>and/or</u> for <u>more</u> than 60 minutes on any given day, expert assessment of the following relevant factors is required to determine the impact significance and mitigation requirement:

- The separation distance to the panel area larger separation distances reduce the proportion of an observer's field of view that is affected by glare;
- The position of the Sun effects that coincide with direct sunlight appear less prominent than those that do not;
- Whether visibility is likely from all storeys the ground floor is typically considered the main living space and has a greater significance with respect to residential amenity;
- Whether the dwelling appears to have windows facing the reflecting area factors that restrict potential views of a reflecting area reduce the level of impact.

Following consideration of these mitigating factors, where the solar reflection is not deemed significant, a low impact is predicted, and mitigation is not recommended. Where the solar reflection is deemed significant, the impact significance is moderate, and mitigation is recommended.

If effects last for <u>more</u> than 3 months per year and for <u>more</u> than 60 minutes on any given day, and there are no mitigating factors, the impact significance is high, and mitigation is required.

#### 5.4.2 Geometric Results and Discussion

Table 5 on the following page presents the following:

- Geometric modelling results (bare earth terrain i.e. without consideration of screening);
- Desk-based review of identified screening;
- Consideration of any relevant mitigating factors present, where appropriate;
- Predicted impact significance.



Dwelling Receptor	Geometric Modelling Results (without consideration of screening)	Identified Screening and Predicted Visibility (desk-based review)	Duration of effects (with consideration of screening) <sup>17</sup>	Relevant Factors	Predicted Impact Classification	Mitigation Recommended/ Required?
1-4	Solar reflections <u>are</u> <u>geometrically possible</u> for: <u>Less</u> than three months <u>Less</u> than 60 minutes	Existing vegetation screening Predicted to significantly obstruct views of reflecting panels such that views are <u>not</u> <u>possible</u> in practice	None	N/A	No impact	No
5-12	Solar reflections are <u>not</u> geometrically possible	N/A	N/A	N/A	No impact	No
13-30	Solar reflections <u>are</u> <u>geometrically possible</u> for: <u>More</u> than three months <u>Less</u> than 60 minutes	Existing vegetation screening Predicted to significantly obstruct views of reflecting panels such that views are <u>not</u> <u>possible</u> in practice	None	N/A	No impact	No

<sup>&</sup>lt;sup>17</sup> Assessment scenario may include an initial conservative qualitative consideration of screening in determining the duration of predicated effects in practice. The reflecting area of the solar development may be partially screened such that it does not meet the two key criteria i.e. 1) The solar reflection occurs for more than 3 months per year. 2) and/or for more than 60 minutes on any given day.



Dwelling Receptor	Geometric Modelling Results (without consideration of screening)	Identified Screening and Predicted Visibility (desk-based review)	Duration of effects (with consideration of screening) <sup>17</sup>	Relevant Factors	Predicted Impact Classification	Mitigation Recommended/ Required?
31-32	Solar reflections <u>are</u> <u>geometrically possible</u> for: <u>Less</u> than three months <u>Less</u> than 60 minutes	Existing vegetation screening Predicted to significantly obstruct views of reflecting panels such that views are <u>not</u> <u>possible</u> in practice	None	N/A	No impact	No
33	Solar reflections are <u>not</u> geometrically possible	N/A	N/A	N/A	No impact	No

 Table 5 Geometric Modelling Results and Predicted Impact Classification for dwelling receptors

#### 5.4.3 Desk-Based Review of Available Imagery

A desk-based review of the available imagery is presented in Figures 13-15 on the following pages. The cumulative reflecting panel areas are indicated by regions of yellow. The identified existing screening in the form of existing vegetation and buildings is outlined in orange.





Figure 13 Screening for dwellings 1-4





Figure 14 Screening for dwellings 13-31



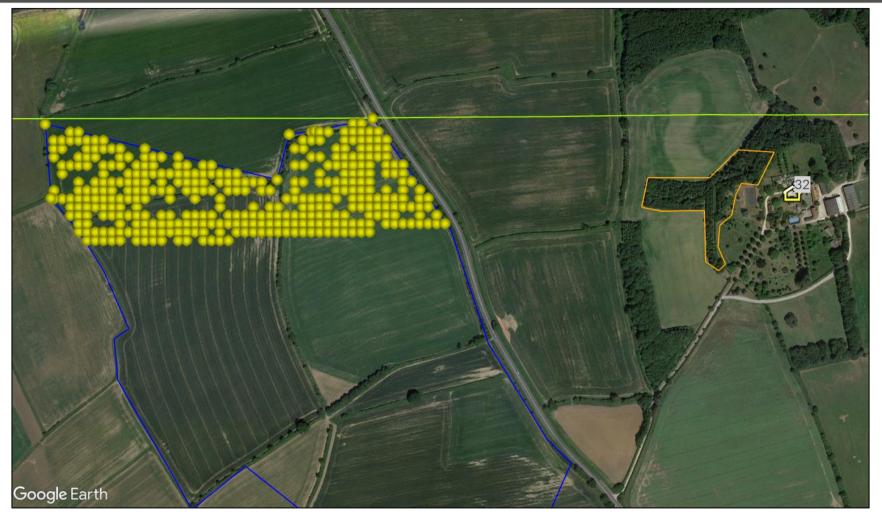


Figure 15 Screening for dwelling 32



# 6 HIGH-LEVEL AVIATION CONSIDERATIONS

# 6.1 Overview

There is no formal buffer distance within which aviation effects must be modelled. However, in practice, concerns are most often raised for developments within 10km of a licensed aerodrome. Requests for modelling at ranges of 10-20km are far less common. Assessment of aviation effects for developments over 20km from a licensed aerodrome is a very unusual requirement.

# 6.2 Aerodrome Details

RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield have been identified for assessment and are located approximately 10.92km south southeast, 9.79km south, 7.97km southeast and 5.54km northeast of the proposed development, respectively.

# 6.2.1 RAF Benson

RAF Benson is a military aerodrome owned by the Ministry of Defence and operated by the Royal Air Force (RAF). It is understood to have one operational runway and an ATC Tower. The runway details are presented below:

• 01RH/19 – 1,826m (Blacktop surface).

# 6.2.2 North Moreton Airfield

North Moreton Airfield is an unlicensed GA aerodrome. It is understood that the aerodrome does not have an ATC Tower. The runway details are presented below:

• 16/34 – 830m (Grass).

# 6.2.3 Chalgrove Airport

Chalgrove Airport is a licensed Civil Aviation Authority (CAA) aerodrome. It is understood to have one operational runway and an ATC Tower. The runway details are presented below:

• 12/30 – 1,830m (Asphalt).

# 6.2.4 Slay Barn Airfield

Slay Barn Airfield is an unlicensed General Aviation (GA) aerodrome. It is understood that the aerodrome does not have an ATC Tower. The runway details are presented below:

• 06/24 – 700m (Grass).

# 6.3 High-Level Assessment

The location of RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield and the approach paths relative to the proposed development are shown in Figure 17 on the following page.

Considering the size of the proposed development, its location, and past project experience, the following can be reliably concluded for the identified airfields:

• Any solar reflections towards pilots along the approach path towards thresholds 01RH at RAF Benson, 34 at North Moreton Airfield, 30 at Chalgrove Airprot, and 24 at Slay



Barn Airfield would have glare intensities no greater than 'low potential for temporary after image'. Considering the associated guidance (Appendix D) and industry best practice pertaining to 2-mile approach paths, it can be concluded that this level of glare is acceptable for these approach paths.

- Any solar reflections will occur outside a pilot's primary field of view (50 degrees either side of the approach bearing) along the approach path towards runway thresholds 19 at RAF Benson, 16 at North Moreton Airfield, 12 at Chalgrove Airprot, and 06 at Slay Barn Airfield. This is acceptable in accordance with the associated guidance and industry best practice.
- Based on the separation distance, relative location of the airfield to the solar development, and the size of the proposed development, reflections towards the air traffic control tower at RAF Benson and Chalgrove Airport are considered unlikely. Furthermore, any such reflections are not expected to be visible to a controller at this range.

Overall, no significant impacts upon aviation activity associated with RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield are predicted, and no detailed modelling is recommended.



Figure 16 Identified airfields relative to the proposed development



# 7 OVERALL CONCLUSIONS

# 7.1 Assessment Conclusions - Aviation

#### Abingdon Airfield

Solar reflections with 'low potential for temporary after-image' ('green' glare) are geometrically possible along the 1-mile splayed approach paths and visual circuits for runways 08/26 and 18/36 at Abingdon Airfield. This is acceptable in accordance with the associated guidance (Appendix D) and industry best practice; therefore, a low impact is predicted and mitigation is not required.

#### **Drayton St Leonard Airfield**

No solar reflections are geometrically possible towards the 1-mile splayed approach paths and visual circuits for runway 06 at Drayton St Leonard Airfield. Therefore, no impact is predicted, and mitigation is not required.

Solar reflections with 'low potential for temporary after-image' ('green' glare) are geometrically possible along the 1-mile splayed approach paths and visual circuits for runway 24 at Drayton St Leonard Airfield. This is acceptable in accordance with the associated guidance (Appendix D) and industry best practice; therefore, a low impact is predicted and mitigation is not required.

# 7.2 Assessment Conclusions - Roads

Solar reflections are geometrically possible towards a 1.7km section of the assessed A4074.

For 1.6km of the A4074 screening in the form of existing vegetation, buildings and terrain is predicted to significantly obstruct views of reflecting panels for road users travelling along these sections of road. Therefore, no impacts are predicted, and mitigation is not required.

For the remaining 100m section where solar reflections are geometrically possible, unobstructed solar reflections occur outside of the primary field of view (50 degrees either side of the direction of travel). Therefore, a low impact is predicted in accordance with the guidance in Appendix D and mitigation is not recommended.

# 7.3 Assessment Conclusions - Dwellings

Solar reflections are geometrically possible towards 24 of the 33 identified dwellings. Significant screening of the reflecting panels in the form of existing and proposed vegetation and/or buildings has been identified for all of these dwellings, for which no impact is predicted and mitigation is not required.

# 7.4 Assessment Conclusions – High Level Aviation

Considering the size of the proposed development, its location, and past project experience, the following can be reliably concluded for RAF Benson, North Moreton Airfield, Chalgrove Airport, and Slay Barn Airfield:

• Any solar reflections towards pilots along the approach path towards thresholds 01RH at RAF Benson, 34 at North Moreton Airfield, 30 at Chalgrove Airprot, and 24 at Slay



Barn Airfield would have glare intensities no greater than 'low potential for temporary after image'. Considering the associated guidance (Appendix D) and industry best practice pertaining to 2-mile approach paths, it can be concluded that this level of glare is acceptable for these approach paths.

- Any solar reflections will occur outside a pilot's primary field of view (50 degrees either side of the approach bearing) along the approach path towards runway thresholds 19 at RAF Benson, 16 at North Moreton Airfield, 12 at Chalgrove Airprot, and 06 at Slay Barn Airfield. This is acceptable in accordance with the associated guidance and industry best practice.
- Based on the separation distance, relative location of the airfield to the solar development, and the size of the proposed development, reflections towards the air traffic control tower at RAF Benson and Chalgrove Airport are considered unlikely. Furthermore, any such reflections are not expected to be visible to a controller at this range.

Overall, no significant impacts upon aviation activity associated with the identified airfields are predicted, and no detailed modelling is recommended.



# **APPENDIX A - OVERVIEW OF GLINT AND GLARE GUIDANCE**

#### **Overview**

This section presents details regarding the relevant guidance and studies with respect to the considerations and effects of solar reflections from solar panels, known as 'Glint and Glare'.

This is not a comprehensive review of the data sources and is limited to the UK; however, it is relevant from a technical and planning perspective. The section is intended to give an overview of the important parameters and considerations that have informed this assessment.

# **UK Planning Policy**

The National Planning Policy Framework under the planning practice guidance for Renewable and Low Carbon Energy<sup>18</sup> (specifically regarding the consideration of solar farms, paragraph 013) states:

'What are the particular planning considerations that relate to large scale ground-mounted solar photovoltaic Farms?

The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively. Particular factors a local planning authority will need to consider include:

•••

- the proposal's visual impact, the effect on landscape of glint and glare (see guidance on landscape assessment) and on <u>neighbouring uses and aircraft safety</u>;
- the extent to which there may be additional impacts if solar arrays follow the daily movement of the sun;

•••

The approach to assessing cumulative landscape and visual impact of large scale solar farms is likely to be the same as assessing the impact of wind turbines. However, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography the area of a zone of visual influence could be zero.'

<sup>&</sup>lt;sup>18</sup> <u>Renewable and low carbon energy</u>, Ministry of Housing, Communities & Local Government, date: 18 June 2015, accessed on: 01/11/2021



#### National Policy Statement for Renewable Energy Infrastructure

The National Policy Statement for Renewable Energy Infrastructure (EN-3)<sup>19</sup> sets out the primary policy for decisions by the Secretary of State for nationally significant renewable energy infrastructure. Sections 2.10.102-106 state:

- <sup>'2.10.102</sup> Solar panels are specifically designed to absorb, not reflect, irradiation.<sup>20</sup> However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.
- 2.10.103 Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.
- 2.10.104 When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.
- 2.10.105 The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.
- 2.10.106 When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.'

The EN-3 does not state which receptors should be considered as part of a quantitative glint and glare assessment. Based on Pager Power's extensive project experience, typical receptors include residential dwellings, road users, aviation infrastructure, and railway infrastructure.

Sections 2.10.134-136 state:

- <sup>(2.10.134</sup> Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise of (or be covered with) anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.
- 2.10.135 Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.
- 2.10.136 Applicants may consider adjusting the azimuth alignment of or changing the elevation tilt angle of a solar panel, within the economically viable range, to alter the angle of incidence.

<sup>&</sup>lt;sup>19</sup> <u>National Policy Statement for Renewable Energy Infrastructure (EN-3)</u>, Department for Energy Security & Net Zero, date: November 2023, accessed on: 21/12/2023.

<sup>&</sup>lt;sup>20</sup> 'Most commercially available solar panels are designed with anti-reflective glass or are produced with anti-reflective coating and have a reflective capacity that is generally equal to or less hazardous than other objects typically found in the outdoor environment, such as bodies of water or glass buildings.'



In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy.'

The mitigation strategies listed within the EN-3 are relevant strategies that are frequently utilised to eliminate or reduce glint and glare effects towards surrounding observers. The most common form of mitigation is the implementation of screening along the site boundary.

Sections 2.10.158-159 state:

- 2.10.158 Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).
- 2.10.159 Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.

The EN-3 goes some way in acknowledging that the issue is more complex than presented in the early draft issues; though, this is still unlikely to be welcomed by aviation stakeholders, who will still request a glint and glare assessment on the basis that glare may lead to a potentially significant impact upon aviation safety.

Finally, the EN-3 relates solely to nationally significant renewable energy infrastructure and therefore does not apply to all planning applications for solar farms.

#### **Ground-Based Receptors**

No process for determining and contextualising the effects of glint and glare is provided for assessing the impact of solar reflections upon surrounding roads and dwellings. Therefore, the Pager Power approach is to determine whether a reflection from the proposed solar development is geometrically possible and then to compare the results against the relevant guidance/studies to determine whether the reflection is significant.

The Pager Power approach has been informed by the policy presented above, current studies (presented in Appendix B) and stakeholder consultation. Further information can be found in Pager Power's Glint and Glare Guidance document which was produced due to the absence of existing guidance and a specific standardised assessment methodology.

#### **Aviation Assessment Guidance**

The UK Civil Aviation Authority (CAA) issued interim guidance relating to Solar Photovoltaic Systems (SPV) on 17 December 2010 and was subject to a CAA information alert 2010/53. The formal policy was cancelled on September 7<sup>th</sup>, 2012<sup>21</sup> however the advice is still applicable<sup>22</sup>

<sup>&</sup>lt;sup>21</sup> Archived at Pager Power

<sup>&</sup>lt;sup>22</sup> Reference email from the CAA dated 19/05/2014.



until a formal policy is developed. The relevant aviation guidance from the CAA is presented in the section below.

#### **CAA Interim Guidance**

This interim guidance makes the following recommendations (p.2-3):

'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 permission 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<sup>23</sup>, 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.

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.'

#### **FAA Guidance**

<sup>&</sup>lt;sup>23</sup> Aerodrome Licence Holder.

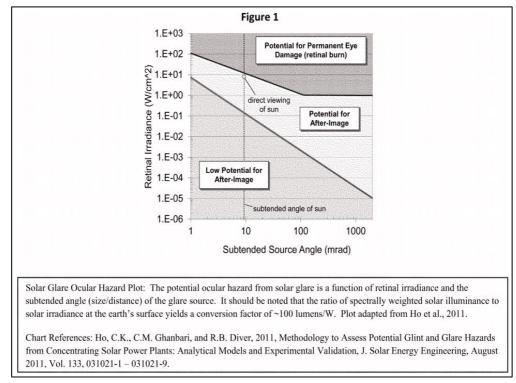


The most comprehensive guidelines available for the assessment of solar developments near aerodromes were produced initially in November 2010 by the United States Federal Aviation Administration (FAA) and updated in 2013.

The 2010 document is entitled 'Technical Guidance for Evaluating Selected Solar Technologies on Airports'<sup>24</sup> and the 2013 update is entitled 'Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports'<sup>25</sup>. In April 2018 the FAA released a new version (Version 1.1) of the 'Technical Guidance for Evaluating Selected Solar Technologies on Airports'<sup>26</sup>.

An overview of the methodology presented within the 2013 interim guidance and adopted by the FAA is presented below. This methodology is not presented within the 2018 guidance.

- Solar energy systems located on an airport that is not federally-obligated or located outside the property of a federally-obligated airport are not subject to this policy.
- Proponents of solar energy systems located off-airport property or on non-federallyobligated airports are strongly encouraged to consider the requirements of this policy when siting such system.
- FAA adopts the Solar Glare Hazard Analysis Plot.... as the standard for measuring the ocular impact of any proposed solar energy system on a federally-obligated airport. This is shown in the figure below.



<sup>&</sup>lt;sup>24</sup> Archived at Pager Power

<sup>25</sup> Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports, Department of Transportation, Federal Aviation Administration (FAA), date: 10/2013, accessed on: 20/03/2019

<sup>&</sup>lt;sup>26</sup> <u>Technical Guidance for Evaluating Selected Solar Technologies on Airports</u>, Federal Aviation Administration (FAA), date: 04/2018, accessed on: 20/03/2019



Solar Glare Hazard Analysis Plot (FAA)

- To obtain FAA approval to revise an airport layout plan to depict a solar installation and/or a "no objection" ... the airport sponsor will be required to demonstrate that the proposed solar energy system meets the following standards:
- No potential for glint or glare in the existing or planned Airport Traffic Control Tower (ATC) cab, and
- No potential for glare or "low potential for after-image" ... along the final approach path for any existing landing threshold or future landing thresholds (including any planned interim phases of the landing thresholds) as shown on the current FAA-approved Airport Layout Plan (ALP). The final approach path is defined as two (2) miles from fifty (50) feet above the landing threshold using a standard three (3) degree glidepath.
- Ocular impact must be analysed over the entire calendar year in one (1) minute intervals from when the sun rises above the horizon until the sun sets below the horizon.

The bullets highlighted above state there should be 'no potential for glare' at that ATC Tower and 'no' or 'low potential for glare' on the approach paths.

Key points from the 2018 FAA guidance are presented below.

- Reflectivity refers to light that is reflected off surfaces. The potential effects of reflectivity
  are glint (a momentary flash of bright light) and glare (a continuous source of bright light).
  These two effects are referred to hereinafter as "glare," which can cause a brief loss of
  vision, also known as flash blindness<sup>27</sup>.
- The amount of light reflected off a solar panel surface depends on the amount of sunlight hitting the surface, its surface reflectivity, geographic location, time of year, cloud cover, and solar panel orientation.
- As illustrated on Figure 16<sup>28</sup>, flat, smooth surfaces reflect a more concentrated amount of sunlight back to the receiver, which is referred to as specular reflection. The more a surface is polished, the more it shines. Rough or uneven surfaces reflect light in a diffused or scattered manner and, therefore, the light will not be received as bright.
- Because the FAA has no specific standards for airport solar facilities and potential glare, the type of glare analysis may vary. Depending on site specifics (e.g., existing land uses, location and size of the project) an acceptable evaluation could involve one or more of the following levels of assessment:
  - A qualitative analysis of potential impact in consultation with the Control Tower, pilots and airport officials;
  - A demonstration field test with solar panels at the proposed site in coordination with FAA Tower personnel;
  - $\circ~$  A geometric analysis to determine days and times when an impact is predicted.
- The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and system design.

<sup>&</sup>lt;sup>27</sup> Flash Blindness, as described in the FAA guidelines, can be described as a temporary visual interference effect that persists after the source of illumination has ceased. This occurs from many reflective materials in the ambient environment.

<sup>&</sup>lt;sup>28</sup> First figure in Appendix B.



- **1.** Assessing Baseline Reflectivity Conditions Reflection in the form of glare is present in current aviation operations. The existing sources of glare come from glass windows, auto surface parking, rooftops, and water bodies. At airports, existing reflecting surfaces may include hangar roofs, surface parking, and glassy office buildings. To minimize unexpected glare, windows of air traffic control towers and airplane cockpits are coated with anti-reflective glazing. Operators also wear polarized eye wear. Potential glare from solar panels should be viewed in this context. Any airport considering a solar PV project should first review existing sources of glare at the airport and the effectiveness of measures used to mitigate that glare.
- **2. Tests in the Field** Potential glare from solar panels can easily be viewed at the airport through a field test. A few airports have coordinated these tests with FAA Air Traffic Controllers to assess the significance of glare impacts. To conduct such a test, a sponsor can take a solar panel out to proposed location of the solar project, and tilt the panel in different directions to evaluate the potential for glare onto the air traffic control tower. For the two known cases where a field test was conducted, tower personnel determined the glare was not significant. If there is a significant glare impact, the project can be modified by ensuring panels are not directed in that direction.
- **3. Geometric Analysis** Geometric studies are the most technical approach for reflectivity issues. They are conducted when glare is difficult to assess through other methods. Studies of glare can employ geometry and the known path of the sun to predict when sunlight will reflect off of a fixed surface (like a solar panel) and contact a fixed receptor (e.g., control tower). At any given site, the sun moves across the sky every day and its path in the sky changes throughout year. This in turn alters the destination of the resultant reflections since the angle of reflection for the solar panels will be the same as the angle at which the sun hits the panels. The larger the reflective surface, the greater the likelihood of glare impacts.
- Facilities placed in remote locations, like the desert, will be far from receptors and therefore potential impacts are limited to passing aircraft. Because the intensity of the light reflected from the solar panel decreases with increasing distance, an appropriate question is how far you need to be from a solar reflected surface to avoid flash blindness. It is known that this distance is directly proportional to the size of the array in question 29 but still requires further research to definitively answer.
- Experiences of Existing Airport Solar Projects Solar installations are presently operating at a number of airports, including megawatt-sized solar facilities covering multiple acres. Air traffic control towers have expressed concern about glint and glare from a small number of solar installations. These were often instances when solar installations were sited between the tower and airfield, or for installations with inadequate or no reflectivity analysis. Adequate reflectivity analysis and alternative siting addressed initial issues at those installations.

<sup>&</sup>lt;sup>29</sup> Ho, Clifford, Cheryl Ghanbari, and Richard Diver. 2009. Hazard Analysis of Glint and Glare From Concentrating Solar Power Plants. SolarPACES 2009, Berlin Germany. Sandia National Laboratories.

#### Air Navigation Order (ANO) 2016

In some instances, an aviation stakeholder can refer to the ANO 2016<sup>30</sup> with regard to safeguarding. Key points from the document are presented below.

#### Lights liable to endanger

224. (1) A person must not exhibit in the United Kingdom any light which-

(a) by reason of its glare is liable to endanger aircraft taking off from or landing at an aerodrome; or

(b) by reason of its liability to be mistaken for an aeronautical ground light is liable to endanger aircraft.

(2) If any light which appears to the CAA to be a light described in paragraph (1) is exhibited, the CAA may direct the person who is the occupier of the place where the light is exhibited or who has charge of the light, to take such steps within a reasonable time as are specified in the direction—

(a) to extinguish or screen the light; and

(b) to prevent in the future the exhibition of any other light which may similarly endanger aircraft.

(3) The direction may be served either personally or by post, or by affixing it in some conspicuous place near to the light to which it relates.

(4) In the case of a light which is or may be visible from any waters within the area of a general lighthouse authority, the power of the CAA under this article must not be exercised except with the consent of that authority.

#### Lights which dazzle or distract

225. A person must not in the United Kingdom direct or shine any light at any aircraft in flight so as to dazzle or distract the pilot of the aircraft.'

The document states that no 'light', 'dazzle' or 'glare' should be produced which will create a detrimental impact upon aircraft safety.

#### Endangering safety of an aircraft

240. A person must not recklessly or negligently act in a manner likely to endanger an aircraft, or any person in an aircraft.

#### Endangering safety of any person or property

241. A person must not recklessly or negligently cause or permit an aircraft to endanger any person or property.

<sup>&</sup>lt;sup>30</sup> The Air Navigation Order 2016. [online] Available at:

<sup>&</sup>lt;a>https://www.legislation.gov.uk/uksi/2016/765/contents/made> [Accessed 4 February 2022].</a>



# Civil Aviation Authority consolidation of UK Regulation 139/2014

The Civil Aviation Authority (CAA) published a consolidating document<sup>31</sup> of UK regulations, (Implementing Rules, Acceptable Means of Compliance and Guidance Material), in 2023. A summary of material relevant to aerodrome safeguarding is presented below:

(a) The aerodrome operator should have procedures to monitor the changes in the obstacle environment, marking and lighting, and in human activities or land use on the aerodrome and the areas around the aerodrome, as defined in coordination with the CAA. The scope, limits, tasks and responsibilities for the monitoring should be defined in coordination with the relevant air traffic services providers, and with the CAA and other relevant authorities.

(b) The limits of the aerodrome surroundings that should be monitored by the aerodrome operator are defined in coordination with the CAA and should include the areas that can be visually monitored during the inspections of the manoeuvring area.

(c) The aerodrome operator should have procedures to mitigate the risks associated with changes on the aerodrome and its surroundings identified with the monitoring procedures. The scope, limits, tasks, and responsibilities for the mitigation of risks associated to obstacles or hazards outside the perimeter fence of the aerodrome should be defined in coordination with the relevant air traffic services providers, and with the CAA and other relevant authorities.

(d) The risks caused by human activities and land use which should be assessed and mitigated should include:

- 1. obstacles and the possibility of induced turbulence;
- 2. the use of hazardous, confusing, and misleading lights;
- 3. the dazzling caused by large and highly reflective surfaces;
- 4. sources of non-visible radiation, or the presence of moving, or fixed objects which may interfere with, or adversely affect, the performance of aeronautical communications, navigation and surveillance systems; and
- 5. non-aeronautical ground light near an aerodrome which may endanger the safety of aircraft and which should be extinguished, screened, or otherwise modified so as to eliminate the source of danger.

<sup>&</sup>lt;sup>31</sup> https://regulatorylibrary.caa.co.uk/139-2014-pdf/PDF.pdf



# **APPENDIX B - OVERVIEW OF GLINT AND GLARE STUDIES**

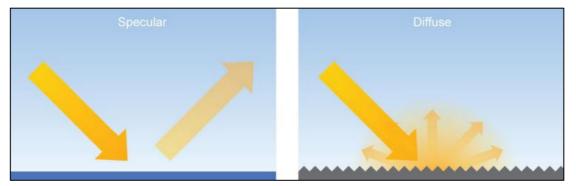
### **Overview**

Studies have been undertaken assessing the type and intensity of solar reflections from various surfaces including solar panels and glass. An overview of these studies is presented below.

The guidelines presented are related to aviation safety. The results are applicable for the purpose of this analysis.

# **Reflection Type from Solar Panels**

Based on the surface conditions reflections from light can be specular and diffuse. A specular reflection has a reflection characteristic similar to that of a mirror; a diffuse will reflect the incoming light and scatter it in many directions. The figure below, taken from the FAA guidance<sup>32</sup>, illustrates the difference between the two types of reflections. Because solar panels are flat and have a smooth surface most of the light reflected is specular, which means that incident light from a specific direction is reradiated in a specific direction.



Specular and diffuse reflections

<sup>&</sup>lt;sup>32</sup><u>Technical Guidance for Evaluating Selected Solar Technologies on Airports</u>, Federal Aviation Administration (FAA), date: 04/2018, accessed on: 20/03/2019.

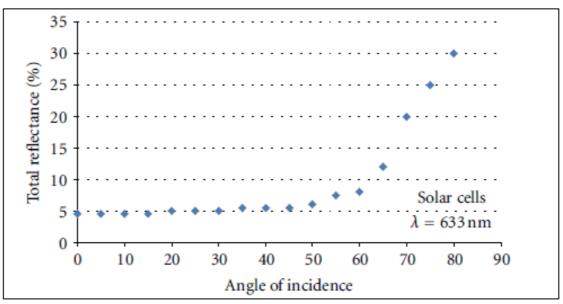


# **Solar Reflection Studies**

An overview of content from identified solar panel reflectivity studies is presented in the subsections below.

# Evan Riley and Scott Olson, "A Study of the Hazardous Glare Potential to Aviators from Utility-Scale Flat-Plate Photovoltaic Systems"

Evan Riley and Scott Olson published in 2011 their study titled: A Study of the Hazardous Glare Potential to Aviators from Utility-Scale Flat-Plate Photovoltaic Systems<sup>33</sup>". They researched the potential glare that a pilot could experience from a 25 degree fixed tilt PV system located outside of Las Vegas, Nevada. The theoretical glare was estimated using published ocular safety metrics which quantify the potential for a postflash glare after-image. This was then compared to the postflash glare after-image caused by smooth water. The study demonstrated that the reflectance of the solar cell varied with angle of incidence, with maximum values occurring at angles close to 90 degrees. The reflectance values varied from approximately 5% to 30%. This is shown on the figure below.



Total reflectance % when compared to angle of incidence

The conclusions of the research study were:

- The potential for hazardous glare from flat-plate PV systems is similar to that of smooth water;
- Portland white cement concrete (which is a common concrete for runways), snow, and structural glass all have a reflectivity greater than water and flat plate PV modules.

<sup>&</sup>lt;sup>33</sup> Evan Riley and Scott Olson, "A Study of the Hazardous Glare Potential to Aviators from Utility-Scale Flat-Plate Photovoltaic Systems," ISRN Renewable Energy, vol. 2011, Article ID 651857, 6 pages, 2011. doi:10.5402/2011/651857



#### FAA Guidance – "Technical Guidance for Evaluating Selected Solar Technologies on Airports"<sup>34</sup>

The 2010 FAA Guidance included a diagram which illustrates the relative reflectance of solar panels compared to other surfaces. The figure shows the relative reflectance of solar panels compared to other surfaces. Surfaces in this figure produce reflections which are specular and diffuse. A specular reflection (those made by most solar panels) has a reflection characteristic similar to that of a mirror. A diffuse reflection will reflect the incoming light and scatter it in many directions. A table of reflectivity values, sourced from the figure within the FAA guidance, is presented below.

Surface	Approximate Percentage of Light Reflected <sup>35</sup>
Snow	80
White Concrete	77
Bare Aluminium	74
Vegetation	50
Bare Soil	30
Wood Shingle	17
Water	5
Solar Panels	5
Black Asphalt	2

Relative reflectivity of various surfaces

Note that the data above does not appear to consider the reflection type (specular or diffuse).

An important comparison in this table is the reflectivity compared to water which will produce a reflection of very similar intensity when compared to that from a solar panel. The study by Riley and Olsen study (2011) also concludes that still water has a very similar reflectivity to solar panels.

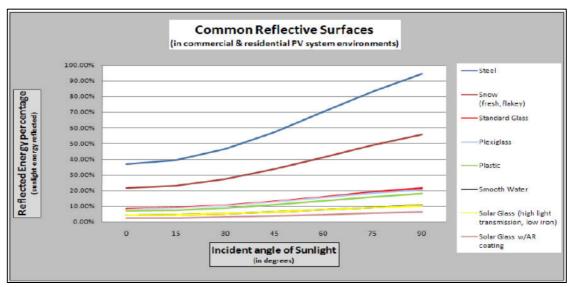
<sup>&</sup>lt;sup>34</sup> <u>Technical Guidance for Evaluating Selected Solar Technologies on Airports</u>, Federal Aviation Administration (FAA), date: 04/2018, accessed on: 20/03/2019.

 $<sup>^{\</sup>rm 35}$  Extrapolated data, baseline of 1,000 W/m² for incoming sunlight.

#### SunPower Technical Notification (2009)

SunPower published a technical notification<sup>36</sup> to 'increase awareness concerning the possible glare and reflectance impact of PV Systems on their surrounding environment'.

The figure presented below shows the relative reflectivity of solar panels compared to other natural and manmade materials including smooth water, standard glass and steel.



Common reflective surfaces

The results, similarly to those from Riley and Olsen study (2011) and the FAA (2010), show that solar panels produce a reflection that is less intense than those of 'standard glass and other common reflective surfaces'.

With respect to aviation and solar reflections observed from the air, SunPower has developed several large installations near airports or on Air Force bases. It is stated that these developments have all passed FAA or Air Force standards with all developments considered "No Hazard to Air Navigation". The note suggests that developers discuss any possible concerns with stakeholders near proposed solar farms.

<sup>&</sup>lt;sup>36</sup> Source: Technical Support, 2009. SunPower Technical Notification – Solar Module Glare and Reflectance.



# APPENDIX C – OVERVIEW OF SUN MOVEMENTS AND RELATIVE REFLECTIONS

The Sun's position in the sky can be accurately described by its azimuth and elevation. Azimuth is a direction relative to true north (horizontal angle i.e. from left to right) and elevation describes the Sun's angle relative to the horizon (vertical angle i.e. up and down).

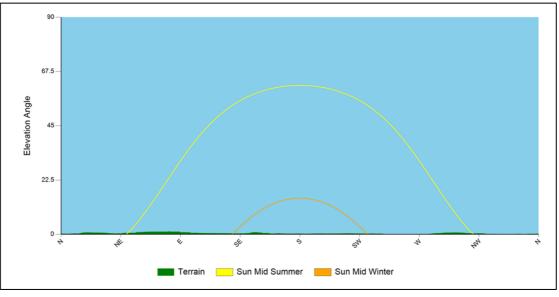
The Sun's position can be accurately calculated for a specific location. The following data being used for the calculation:

- Time;
- Date;
- Latitude;
- Longitude.

The following is true at the location of the solar development:

- The Sun is at its highest around midday and is to the south at this time;
- The Sun rises highest on 21 June (longest day);
- On 21 December, the maximum elevation reached by the Sun is at its lowest (shortest day).

The combination of the Sun's azimuth angle and vertical elevation will affect the direction and angle of the reflection from a reflector. The figure below shows terrain at the horizon from the proposed development location as well as the sunrise and sunset curves throughout the year.



Terrain at the visible horizon and sun paths



# **APPENDIX D - GLINT AND GLARE IMPACT SIGNIFICANCE**

# **Overview**

The significance of glint and glare will vary for different receptors. The following section presents a general overview of the significance criteria with respect to experiencing a solar reflection.

# **Impact Significance Definition**

The table below presents the recommended definition of 'impact significance' in glint and glare terms and the requirement for mitigation under each.

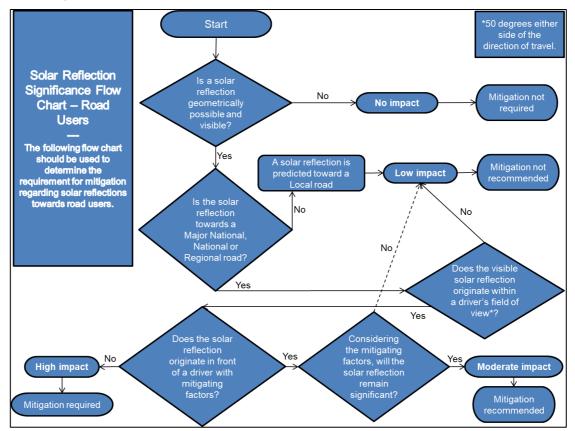
Impact Significance	Definition	Mitigation
No Impact	A solar reflection is not geometrically possible or will not be visible from the assessed receptor.	No mitigation required.
Low	A solar reflection is geometrically possible however any impact is considered to be small such that mitigation is not required e.g. intervening screening will limit the view of the reflecting solar panels significantly.	No mitigation recommended.
Moderate	A solar reflection is geometrically possible and visible however it occurs under conditions that do not represent a worst-case given individual receptor criteria.	Mitigation recommended.
High	A solar reflection is geometrically possible and visible under worst-case conditions that will produce a significant impact given individual receptor criteria	Mitigation will be required if the proposed development is to proceed.

Impact significance definition



# Impact Significance Determination for Road Receptors

The flow chart presented below has been followed when determining the impact significance for road receptors.

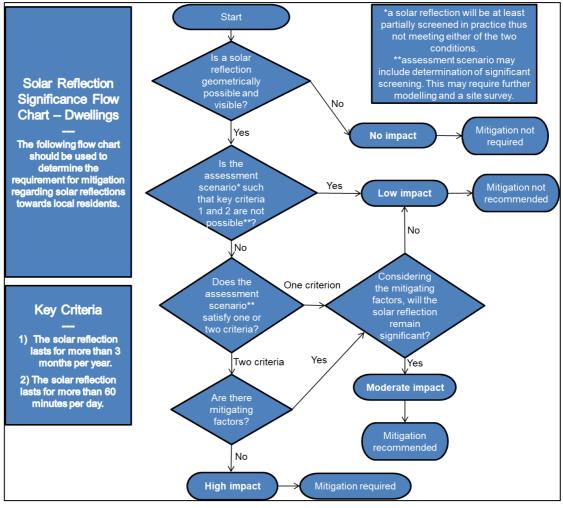


Road user impact significance flow chart



# Impact Significance Determination for Dwelling Receptors

The flow chart presented below has been followed when determining the impact significance for dwelling receptors.

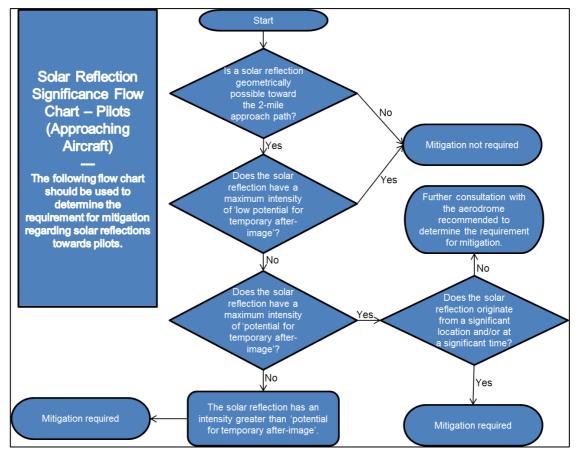


Dwelling impact significance flow chart



# Impact Significance Determination for Approaching Aircraft

The flow chart presented below has been followed when determining the mitigation requirement for approaching aircraft.

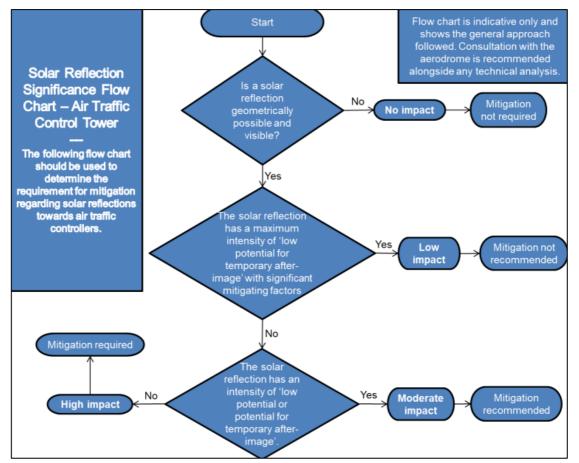


Approaching aircraft receptor mitigation requirement flow chart



# Impact Significance Determination for ATC Tower

The flow chart presented below has been followed when determining the mitigation requirement for the ATC Tower.



ATC tower impact significance flow chart



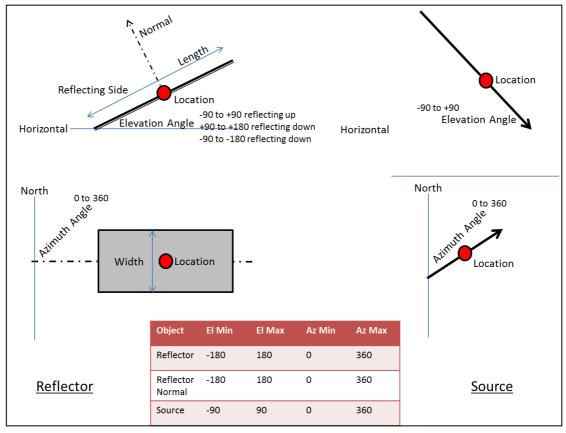
# **APPENDIX E - REFLECTION CALCULATIONS METHODOLOGY**

# Pager Power Methodology

The calculations are three dimensional and complex, accounting for:

- The Earth's orbit around the Sun;
- The Earth's rotation;
- The Earth's orientation;
- The reflector's location;
- The reflector's 3D Orientation.

Reflections from a flat reflector are calculated by considering the normal which is an imaginary line that is perpendicular to the reflective surface and originates from it. The diagram below may be used to aid understanding of the reflection calculation process.



Reflection calculation process

The following process is used to determine the 3D Azimuth and Elevation of a reflection:



- Use the Latitude and Longitude of reflector as the reference for calculation purposes;
- Calculate the Azimuth and Elevation of the normal to the reflector;
- Calculate the 3D angle between the source and the normal;
- If this angle is less than 90 degrees a reflection will occur. If it is greater than 90 degrees no reflection will occur because the source is behind the reflector;
- Calculate the Azimuth and Elevation of the reflection in accordance with the following:
  - The angle between source and normal is equal to angle between normal and reflection;
  - Source, Normal and Reflection are in the same plane.



# **APPENDIX F - ASSESSMENT LIMITATIONS AND ASSUMPTIONS**

# **Pager Power's Model**

The model considers 100% sunlight during daylight hours which is highly conservative.

The model does not account for terrain between the reflecting solar panels and the assessed receptor where a solar reflection is geometrically possible.

The model considers terrain between the reflecting solar panels and the visible horizon (where the sun may be obstructed from view of the panels)<sup>37</sup>.

It is assumed that the panel elevation angle assessed represents the elevation angle for all of the panels within each solar panel area defined.

It is assumed that the panel azimuth angle assessed represents the azimuth angle for all of the panels within each solar panel area defined.

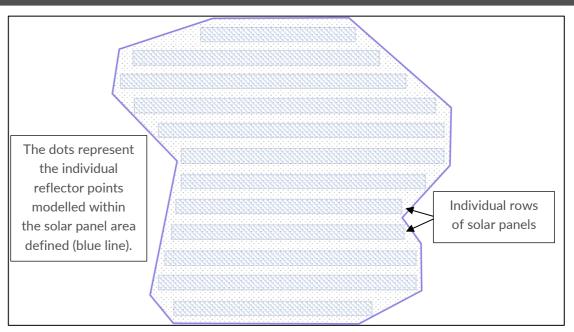
Only a reflection from the face of the panel has been considered. The frame or the reverse or frame of the solar panel has not been considered.

The model assumes that a receptor can view the face of every panel (point, defined in the following paragraph) within the development area whilst in reality this, in the majority of cases, will not occur. Therefore any predicted solar reflection from the face of a solar panel that is not visible to a receptor will not occur in practice.

A finite number of points within each solar panel area defined is chosen based on an assessment resolution so that a comprehensive understanding of the entire development can be formed. This determines whether a solar reflection could ever occur at a chosen receptor. The model does not consider the specific panel rows or the entire face of the solar panel within the development outline, rather a single point is defined every 'x' metres (based on the assessment resolution) with the geometric characteristics of the panel. A panel area is however defined to encapsulate all possible panel locations. See the figure below which illustrates this process.

<sup>&</sup>lt;sup>37</sup> UK only.





Solar panel area modelling overview

A single reflection point is chosen for the geometric calculations. This suitably determines whether a solar reflection can be experienced at a receptor location and the time of year and duration of the solar reflection. Increased accuracy could be achieved by increasing the number of heights assessed however this would only marginally change the results and is not considered significant.

The available street view imagery, satellite mapping, terrain and any site imagery provided by the developer has been used to assess line of sight from the assessed receptors to the modelled solar panel area, unless stated otherwise. In some cases, this imagery may not be up to date and may not give the full perspective of the installation from the location of the assessed receptor.

Any screening in the form of trees, buildings etc. that may obstruct the Sun from view of the solar panels is not within the modelling unless stated otherwise. The terrain profile at the horizon is considered if stated.



### Forge's Sandia National Laboratories' (SGHAT) Model<sup>38</sup>

Summary of assumptions and abstractions required by the SGHAT/ForgeSolar analysis methodology

- 1. Times associated with glare are denoted in Standard time. For Daylight Savings, add one hour.
- 2. Result data files and plots are now retained for two years after analysis completion. Files should be downloaded and saved if additional persistence is required.
- 3. The algorithm does not rigorously represent the detailed geometry of a system; detailed features such as gaps between modules, variable height of the PV array, and support structures may impact actual glare results. However, we have validated our models against several systems, including a PV array causing glare to the air-traffic control tower at Manchester-Boston Regional Airport and several sites in Albuquerque, and the tool accurately predicted the occurrence and intensity of glare at different times and days of the year.
- 4. Several calculations utilize the PV array centroid, rather than the actual glare spot location, due to algorithm limitations. This may affect results for large PV footprints. Additional analyses of array sub-sections can provide additional information on expected glare. This primarily affects analyses of path receptors.
- 5. Random number computations are utilized by various steps of the annual hazard analysis algorithm. Predicted minutes of glare can vary between runs as a result. This limitation primarily affects analyses of Observation Point receptors, including ATCTs. Note that the SGHAT/ForgeSolar methodology has always relied on an analytical, qualitative approach to accurately determine the overall hazard (i.e. green vs. yellow) of expected glare on an annual basis.
- 6. The subtended source angle (glare spot size) is constrained by the PV array footprint size. Partitioning large arrays into smaller sections will reduce the maximum potential subtended angle, potentially impacting results if actual glare spots are larger than the sub-array size. Additional analyses of the combined area of adjacent sub-arrays can provide more information on potential glare hazards. (See previous point on related limitations.)
- 7. The algorithm assumes that the PV array is aligned with a plane defined by the total heights of the coordinates outlined in the Google map. For more accuracy, the user should perform runs using minimum and maximum values for the vertex heights to bound the height of the plane containing the solar array. Doing so will expand the range of observed solar glare when compared to results using a single height value.
- The algorithm does not consider obstacles (either man-made or natural) between the observation points and the prescribed solar installation that may obstruct observed glare, such as trees, hills, buildings, etc.
- 9. The variable direct normal irradiance (DNI) feature (if selected) scales the user-prescribed peak DNI using a typical clear-day irradiance profile. This profile has a lower DNI in the mornings and evenings and a maximum at solar noon. The scaling uses a clear-day irradiance profile based on a normalized time relative to sunrise, solar noon, and sunset, which are prescribed by a sun-position algorithm and the latitude and longitude obtained from Google maps. The actual DNI on any given day can be affected by cloud cover, atmospheric attenuation, and other environmental factors.
- 10. The ocular hazard predicted by the tool depends on a number of environmental, optical, and human factors, which can be uncertain. We provide input fields and typical ranges of values for these factors so that the user can vary these parameters to see if they have an impact on the results. The speed of SGHAT allows expedited sensitivity and parametric analyses.
- The system output calculation is a DNI-based approximation that assumes clear, sunny skies year-round. It should not be used in place
  of more rigorous modeling methods.
- Hazard zone boundaries shown in the Glare Hazard plot are an approximation and visual aid. Actual ocular impact outcomes encompass a continuous, not discrete, spectrum.
- 13. Glare locations displayed on receptor plots are approximate. Actual glare-spot locations may differ.
- 14. Glare vector plots are simplified representations of analysis data. Actual glare emanations and results may differ.
- 15. PV array tracking assumes the modules move instantly when tracking the sun, and when reverting to the rest position.

<sup>&</sup>lt;sup>38</sup> <u>https://www.forgesolar.com/help/#assumptions</u>



## **APPENDIX G - RECEPTOR AND REFLECTOR AREA DETAILS**

#### **Overview**

Data and terrain heights are ascertained from OSGB 50 DTM data.

#### **Road Receptor Data**

The road receptor data is presented in the tables below. An additional 1.5m height has been added to the elevation to account for the eye-level of a road user.

No.	Longitude (°)	Latitude (°)	No.	Longitude (°)	Latitude (°)
1	-1.21358	51.70027	11	-1.20593	51.69276
2	-1.21278	51.69952	12	-1.20503	51.69203
3	-1.21195	51.69879	13	-1.20420	51.69138
4	-1.21140	51.69798	14	-1.20330	51.69066
5	-1.21095	51.69711	15	-1.20246	51.68989
6	-1.21029	51.69631	16	-1.20178	51.68908
7	-1.20956	51.69554	17	-1.20112	51.68832
8	-1.20868	51.69481	18	-1.20044	51.68751
9	-1.20773	51.69418	19	-1.19967	51.68663
10	-1.20680	51.69345			

Road receptor data

#### **Dwelling Receptor Data**

The dwelling receptor data is presented in the table below. An additional 1.8m height has been added to the elevation to account for the eye-level of an observer on the ground floor at these dwellings.

No.	Longitude (°)	Latitude (°)	No.	Longitude (°)	Latitude (°)
1	-1.22745	51.68763	18	-1.20251	51.69022
2	-1.22753	51.68752	19	-1.20285	51.68994



No.	Longitude (°)	Latitude (°)	No.	Longitude (°)	Latitude (°)
3	-1.22664	51.68732	20	-1.20273	51.68974
4	-1.22652	51.68698	21	-1.20249	51.68968
5	-1.22702	51.68619	22	-1.20221	51.68935
6	-1.22810	51.68515	23	-1.20214	51.68916
7	-1.21499	51.68311	24	-1.20194	51.68903
8	-1.21497	51.68338	25	-1.20167	51.68870
9	-1.21418	51.68553	26	-1.20161	51.68847
10	-1.21292	51.68370	27	-1.20183	51.68843
11	-1.21133	51.68273	28	-1.20321	51.68812
12	-1.21101	51.68289	29	-1.20311	51.68776
13	-1.20781	51.69099	30	-1.20291	51.68763
14	-1.20890	51.69083	31	-1.20297	51.68742
15	-1.20249	51.69068	32	-1.20318	51.69887
16	-1.20236	51.69054	33	-1.22103	51.68544
17	-1.20224	51.69039			

Dwelling receptor data

### **Modelled Reflector Area**

The coordinates in the tables below and on the following pages outline the modelled reflector areas.

No.	Longitude (°)	Latitude (°)	No.	Longitude (°)	Latitude (°)
1	-1.20876	51.69474	13	-1.22090	51.69777
2	-1.20936	51.69511	14	-1.22027	51.69686
3	-1.21088	51.69664	15	-1.22065	51.69670
4	-1.21186	51.69848	16	-1.22057	51.69604

Nuneham Solar 75



No.	Longitude (°)	Latitude (°)	No.	Longitude (°)	Latitude (°)
5	-1.21388	51.70026	17	-1.21862	51.69393
6	-1.21539	51.70006	18	-1.21722	51.69464
7	-1.21606	51.70001	19	-1.21573	51.69391
8	-1.21638	51.69928	20	-1.21561	51.69178
9	-1.22245	51.70018	21	-1.21610	51.69006
10	-1.22232	51.69901	22	-1.21309	51.69053
11	-1.22231	51.69898	23	-1.21090	51.69169
12	-1.22157	51.69844	24	-1.20876	51.69474

Modelled reflector area



# **APPENDIX H – DETAILLED MODELLING RESULTS**

#### **Overview**

The Forge charts for the receptors are shown on the following pages. Each chart shows:

- The annual predicted solar reflections.
- The daily duration of the solar reflections.
- The location of the proposed development where glare will originate.
- The calculated intensity of the predicted solar reflections.

The Pager Power charts for the receptors are shown on the following pages. Each chart shows:

- The receptor (observer) location top right image. This also shows the azimuth range of the Sun itself at times when reflections are possible. If sunlight is experienced from the same direction as the reflecting panels, the overall impact of the reflection is reduced as discussed within the body of the report;
- The reflecting panels bottom right image. The reflecting area is shown in yellow. If the yellow panels are not visible from the observer location, no issues will occur in practice. Additional obstructions which may obscure the panels from view are considered separately within the analysis;
- The reflection date/time graph left hand side of the page. The blue line indicates the dates and times at which geometric reflections are possible. This relates to reflections from the yellow areas;
- The sunrise and sunset curves throughout the year (red and yellow lines).

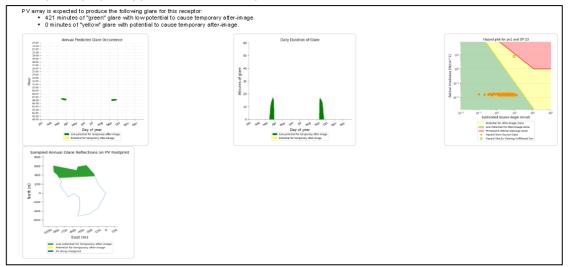
Selected results have been included for reference. Full modelling results are available upon request.

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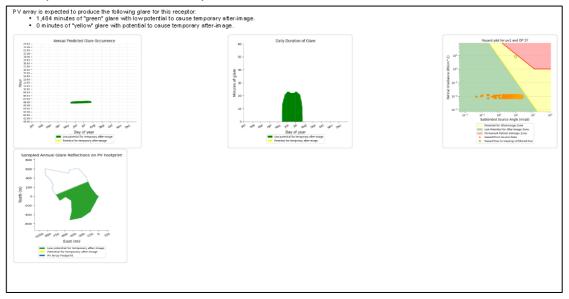
#### **Aviation Receptors**

#### **Abingdon Airfield**

Runway 18 Splayed Approach Path - Receptor 23:

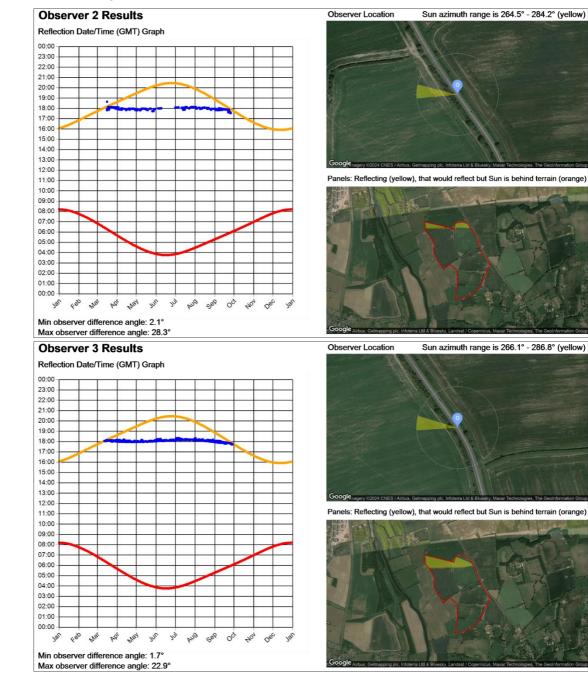


#### Runway 36 Visual Circuits - Receptor 37:

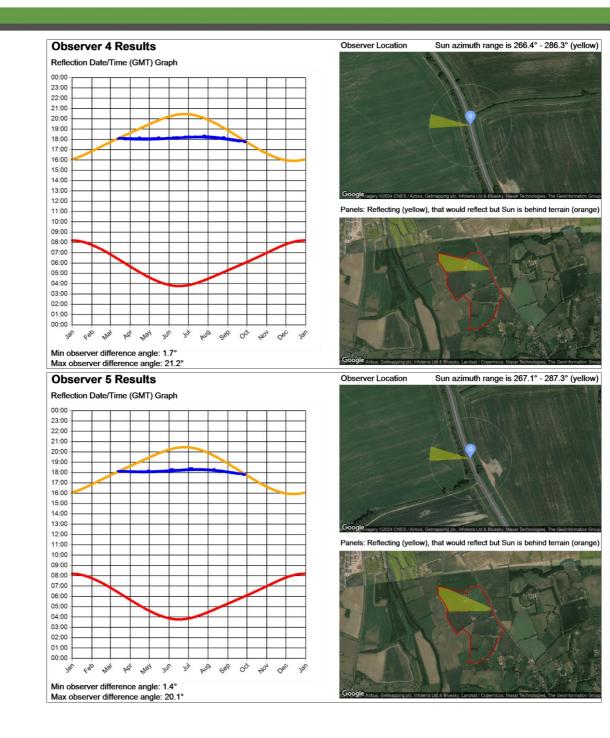




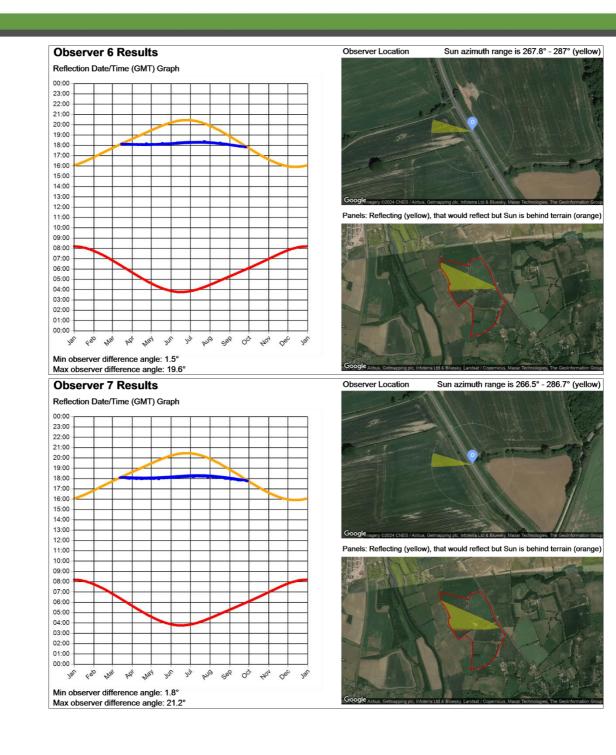
#### **Road Receptors**



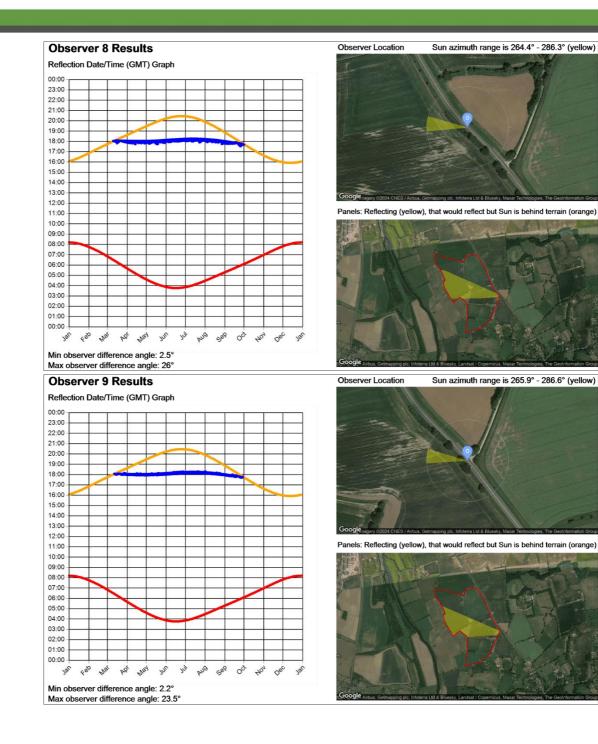




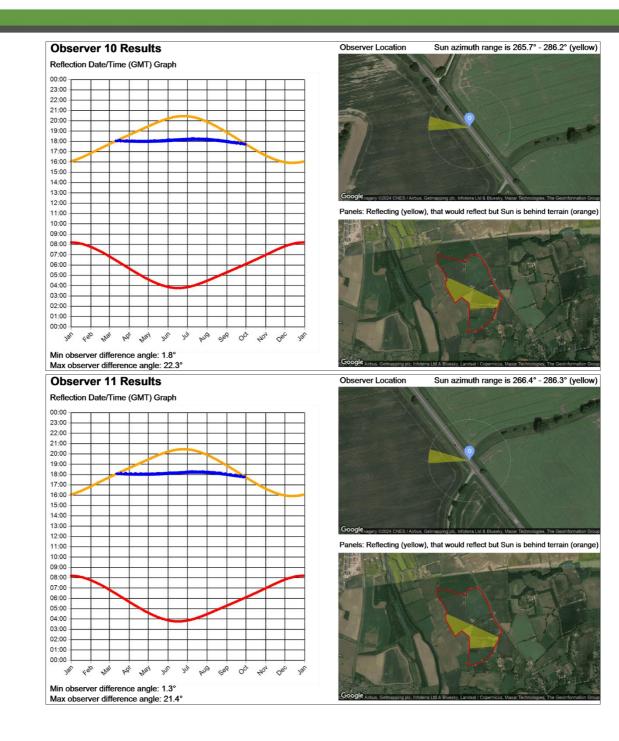




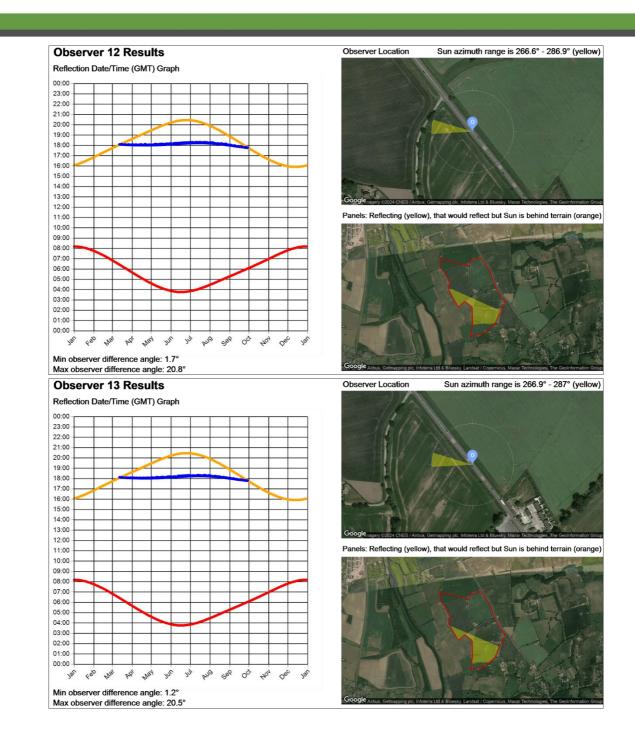




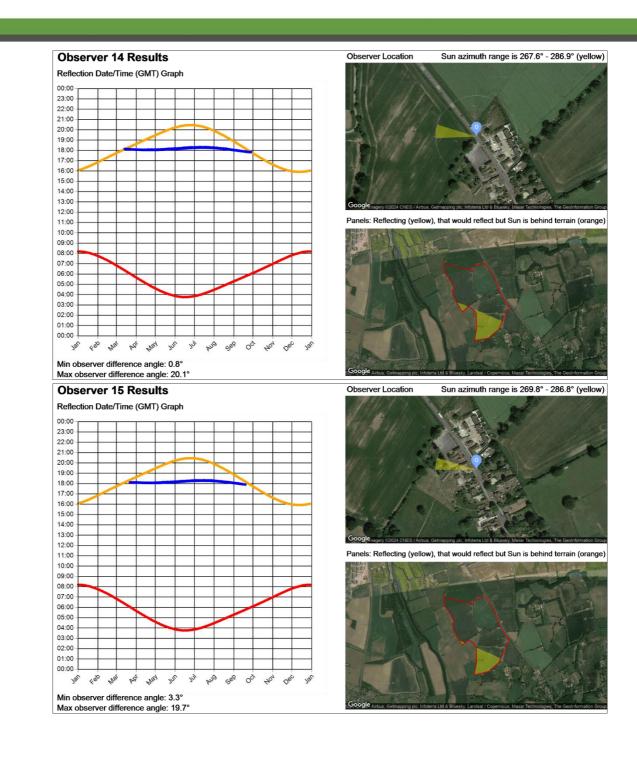




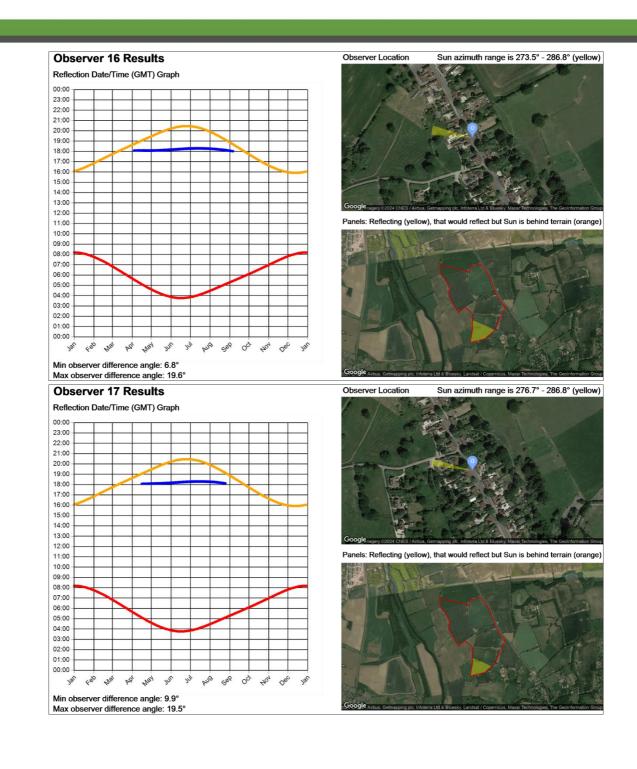




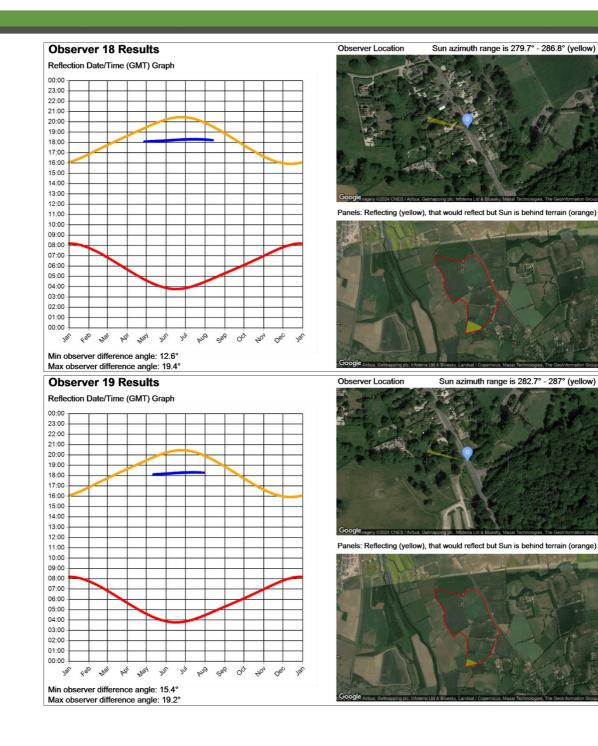








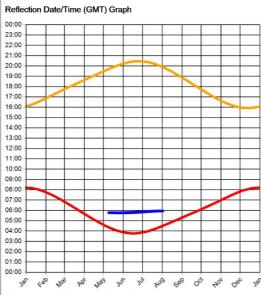


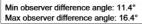


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## **Dwelling Receptors**

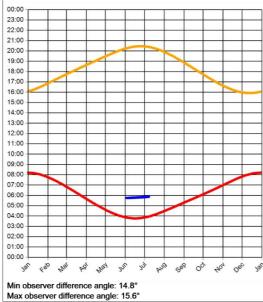
#### **Observer 1 Results**

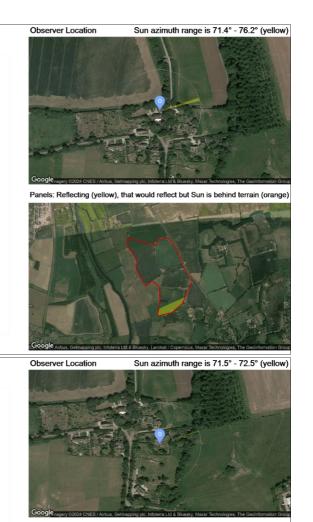




#### **Observer 4 Results**

#### Reflection Date/Time (GMT) Graph

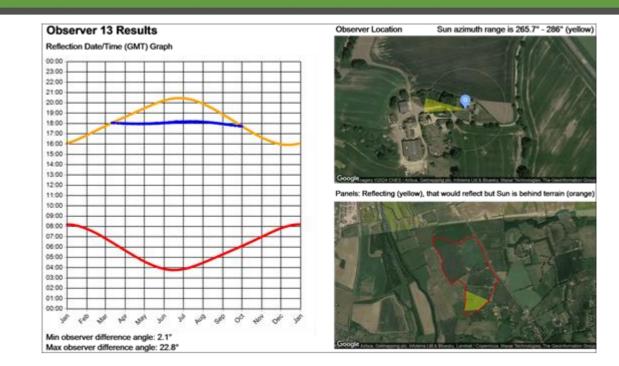




Panels: Reflecting (yellow), that would reflect but Sun is behind terrain (orange)









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