

AENC-NG-CNS-REP-0196

# Norwich to Tilbury

## Volume 5: Reports and Statements

Document: 5.9.32 Signed Statement of Common Ground -  
Brook Farm aerodrome - Tracked Changes Version

Final Issue B

February 2026

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Infrastructure Planning (Applications: Prescribed Forms and Procedure)  
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## Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
A	<u>29 August 2025</u>	<u>DCO Application</u>
B	<u>26 February 2026</u>	<u>Deadline 1</u>

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# **Brook Farm aerodrome**

## ~~Stakeholder Agreement~~

## ~~Norwich to Tilbury~~ Statement of Common Ground

### **1. Purpose of the Statement of Common Ground**

This Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid and Brook Farm aerodrome regarding potential aviation impacts in relation to the proposed Norwich to Tilbury Project.

The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process.

### **2. Parties to the SoCG**

This SoCG is agreed between National Grid and the owner and operator of Brook Farm aerodrome.

### **3. Background**

#### **3.1 Description of the Project/Development**

National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales. The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project'). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.

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The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

National Grid will submit an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of one or more examining inspectors), after a period of public examination, would make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn would decide on whether development consent should be granted for the Project.

The Project is identified as critical to delivering a network which supports the clean power pathways for 2030 delivery.

The Planning Act 2008 places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two non-statutory consultations and one statutory consultation to inform its proposals, together with further targeted consultations.

#### **4. Stakeholder Interests**

The Overarching National Policy Statement for Energy (NPS EN-1) has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. Amongst other impacts, it recognises that all aerodromes can be affected by new energy development and the need, therefore, for NSIPs to be developed collaboratively alongside aerodromes so that safety, operations and capabilities are not adversely affected. Reciprocally, NPS EN-1 states that it is essential for aerodrome operators to work collaboratively with energy infrastructure developers essential for net zero, recognising the need for the important economic and social benefits of aerodromes to be balanced with the urgent need for new energy developments which bring about a wide range of social, economic and environmental benefits.

NPS EN-1 places a requirement on DCO applicants to consult with any aerodrome likely to be affected by the proposed development in preparing an assessment of the proposal on aviation interests. Brook Farm aerodrome was identified and included in the scope for assessment, with its runway end being located within 5 km of the Project's proposed overhead line, recognising the potential for the proximity of the infrastructure to impact aircraft flight patterns and aerodrome operations. In accordance with NPS EN-1 requirements, the owner and operator of

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Brook Farm aerodrome were identified as priority stakeholders for engagement in relation to aviation impact considerations.

The chronology of National Grid's engagement with Brook Farm aerodrome to date, and the evolution of the Project's design is summarised as follows:

- 2022
  - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the Corridor and Preliminary Routeing and Siting Study Report (April 2022)
  - 21 April – 16 June non-statutory consultation
- 2023
  - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(June 2023\)](#)
  - 27 June – 21 August non-statutory consultation on the 2023 Preferred Draft Alignment
  - 24 July meeting at Brook Farm aerodrome between National Grid, its appointed aviation consultants Alan Stratford and Associates (ASA) and the owner of Brook Farm aerodrome. Matters discussed included:
    - Concern regarding the presence of the overhead line as a significant obstacle to aircraft which could not be readily overflown and would require unacceptably steep approach angles;
    - Concern that circuits to the south of the aerodrome would be unviable.
- 2024
  - Development of the 2024 Preferred Draft Alignment, responding to stakeholder feedback, ASA's detailed assessments, and other studies, comprising an eastern deviation to the proposed alignment to support the continuation of flight activities at Brook Farm aerodrome, as described within the [Design Development Report \(April 2024\)](#)
  - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
  - 1 May meeting between National Grid (with ASA) and the owner of Brook Farm aerodrome. Matters raised included:
    - Continued concerns that the overhead line as an obstacle was too high and too close to the aerodrome
- 2025
  - Development of the proposed draft Project Alignment, responding to stakeholder feedback, realigning the overhead line further east and changing its orientation, resulting in increased divergence from the Brook Farm aerodrome's take-off and approach paths. It is suggested that the resulting proposed overhead alignment broadly reflects a design change option proposed by the airfield. Furthermore, it is assessed that, whilst the

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proposed overhead line represents a new obstacle in the vicinity of the airfield, the current southern circuit can continue to be used. Clearance margins for take-off and landing are assessed to be acceptable, with potential operational mitigations being within normal operating practices.

- 30 January to 3 March targeted consultation on proposed changes to the 2024 Preferred Draft Alignment between Palgrave and Mellis (Suffolk 1).
- 25 April online meeting between National Grid (with ASA) and the owner of Brook Farm aerodrome plus an associate. Matters raised included:
  - o Concerns raised regarding clarity and accuracy of aviation impact assessments, raising the need for local conditions to be considered;
  - o Recognition changes to the alignment had been implemented and were welcome;
  - o Operator proposals to practice flying the take-off and approaches required, should the project be implemented

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## 5. Matters Agreed

ID	Issue	Brook Farm aerodrome position (including date)	National Grid response (including date)	Relevant documentation
5.1	Legislative, Regulatory, Policy and Guidance Context	Insufficient consideration of the Civil Aviation Authority's CAP793 guidance recommendation for no obstacles greater than 150ft above the average runway elevation to be within 2000m of the runway mid-point. (July 2024)	As recognised within Section 4, the Overarching National Policy Statement for Energy (EN-1), together with the National Policy Statement for Electricity Networks Infrastructure (EN-5) are the primary determining policies for the Project. It is considered that the National Grid's approach is consistent with the instructions and guidance of EN-1 and EN-5, which has involved consulting with and considering the feedback of Brook Farm aerodrome as an aerodrome likely to be affected by the Project, in preparing and informing impact assessments. Furthermore, the proposal has been designed, where possible, to reduce adverse impacts on the operation and safety of the aerodrome.	CAP 793 Safe Operating Practices at Unlicensed Aerodromes, July 2010; CAP 168 Licensing of Aerodromes, January 2022 CAP 738 Safeguarding of Aerodromes, October 2020 NPS EN-1 Overarching National Policy Statement for Energy, November 2023; EN-5 Electricity Networks National Policy Statement, March 2023
		Brook Farm aerodrome confirmed their agreement with National Grid's position as stated. (May 2025)	EN-1 recognises aviation safeguarding systems and refers to CAA regulations and guidance for licensed and unlicensed aerodromes, as well as the responsibilities of aerodrome operators therein; in accordance, National Grid has ensured its approach appropriately considers aerodrome licensing and safeguarding requirements and parameters, including as described within CAP 168 (Licensing of Aerodromes), CAP 738	

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<b>ID</b>	<b>Issue</b>	<b>Brook Farm aerodrome position (including date)</b>	<b>National Grid response (including date)</b>	<b>Relevant documentation</b>
	Aviation Impact Assessment Methodology and Key Assumptions	Brook Farm aerodrome confirmed their agreement with National Grid's position as stated. (May 2025)	National Grid's Aviation Impact Assessment methodology has been developed to enable site-specific impact assessments for aerodromes potentially impacted by the Project. Its primary aim is to evaluate risks of collision, predominantly during take-off and approaches and including forced landing risks, with the proposed overhead line alignment representing a new obstacle within proximity of aerodromes. Operational safety impacts arising from potential increases to risks of bird strike, wind turbulence and electromagnetic forces as a result of the Project are also considered.	(Safeguarding of Aerodromes) and CAP 793 (Safe Operating Practices at Unlicensed Aerodromes). This is further explained in relation to the aviation impact assessment methodology and key assumptions below. (April 2025)
			As previously stated, National Grid's approach recognises and responds to CAP793 recommendations, albeit with the understanding its broad parameters of 150ft/2000m are generalised suggestions for owner and operator consideration in relation to airfield design, rather than absolute requirements to be addressed by prospective	

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			<p>developers. The methodology enables a bespoke appraisal, appropriate to each aerodrome, that considers a range of factors in addition to the height and location of the proposed overhead line alignment, including: runway length and orientation in relation to the overhead line; aircraft types, performance, flight paths and operational procedures (determined from published information, as well as from previous engagement) and the surrounding context in terms of topography, existing obstacles (including other overhead lines) and neighbouring aerodromes. The assessments consider whether the Project alignment infringes Obstacle Limitation Surfaces (OLS) as specified under the CAA's CAP 168 regulations for licensed aerodromes, recognising this to be a best practice measure for obstacle assessment and treatment, whilst not a regulatory requirement for unlicensed aerodromes. If CAP168 standards are met, the proposed overhead line alignment is considered to have an acceptable impact on the aerodrome's operations and no further design changes are considered likely to be necessary. (April 2025)</p>	

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ID	Issue	Brook Farm aerodrome position (including date)	National Grid response (including date)	Relevant documentation
	<p>Proposed Project Alignment and Impact Assessment Conclusions</p>	<p>The 2024 Preferred Draft Alignment does not allow continued use of southern landing circuit; alternative northern circuit not reasonable due to potential noise and safety impacts to residential area (July 2024)</p> <p>The operator has noted the changed route between Pylon 95 and Pylon 102. This is close to suggestions made in previous feedback to you, following your 2024 Consultation.</p> <p>The operator is very pleased that you have noted our concerns regarding the continued and safe operation of Brook Farm aerodrome, and appreciate your action in this matter. It is hoped that this revised route will now be adopted and included in your</p>	<p>Further design changes have been implemented in response to stakeholder feedback received regarding the 2024 Preferred Draft Alignment during the statutory consultation. These changes repositioned and reoriented the proposed overhead line alignment and are assessed to minimise adverse aviation impacts, allowing continued use of the southern landing circuit, as well as safe clearances of the overhead line during take-off and approaches. CAP168 OLS standards are met, with the exception of a minor infringement of the Inner Horizontal Surface (IHS).</p> <p>Whilst it is recognised that the Project Alignment represents a new obstacle within the vicinity of Brook Farm, our assessment concludes that implemented design changes effectively minimise potential adverse aviation impacts and it is understood that the changes are considered to be workable by the stakeholder. We seek ongoing engagement with the Brook Farm owner and operator to confirm the acceptability of the design. (April 2025)</p>	<p>Aerodrome Assessment Summary – Brook Farm v3 Jun25; Technical Clearance Drawings 01_220101_98_RevA</p>

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		<p>submission. (February 2025)</p> <p>Test flying undertaken by the operator with the projected power line in mind, concluded, based on the good performance of the resident aircraft, and in favourable conditions, that it would be workable to operate safely with certain restrictions, to be considered on a flight by flight basis, in accordance with the conditions on the day, likely meaning a climbing turn on take-off on runway 05, and an approach to land from the north when appropriate.</p>	<p>Brook Farm aerodrome confirmed they had achieved a satisfactory clearance of the projection pylon 94 area, in line with the runway, and considered the circuit pattern to also be manageable in ideal conditions.</p>	

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		Brook Farm aerodrome confirmed their agreement with National Grid's position as stated. (May-June 2025)		

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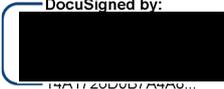
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## 6. Signatures

This Statement of Common Ground is agreed upon by the undersigned parties:

For National Grid   
Name: Simon Pepper  
Position: Project Director  
Date: 18 February 2026

For the owner of Brook Farm aerodrome   
Name: DW MATHIE  
Position: Owner  
Date: 18 February 2026

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