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Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.3.35 Draft Statement of Common Ground - Raydon
Wings Aerodrome**

Final Issue A

February 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Raydon Wings Aerodrome Draft 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 Raydon Wings aerodrome regarding potential aviation impacts in relation to the proposed Norwich to Tilbury Project (the 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 operator of Raydon Wings (the Stakeholder).

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.

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 has submitted application for development consent to the Planning Inspectorate. The Examining Authority (consisting of five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will 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 recent targeted consultations.

4. Stakeholder Interests

The Overarching National Policy Statement for Energy (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, 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.~~

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. ~~Despite being marked on maps and online mapping platforms, Raydon Wings aerodrome was not properly identified by National Grid before its first engagement. Raydon was and included in the scope for assessment only after the aerodrome operator contacted National Grid after its first public engagement. Before that point no contact had been made despite, with its runway end being located within 1.5 km of the Project's proposed overhead line~~

Commented [WC1]: EN1 does not refer to 'net zero'. This is an opinion, not a fact.

Commented [LB2R1]: Added reference to NPS EN-1 paragraph 5.5.5 which refers. Existing wording to be retained but preceded by wording to clarify this is National Grid's position, predicated on the fact of EN-1's content.

Commented [LB3R1]: Wording now moved to table at section 6 to show alternative perspectives in relation to EN-1

Commented [WC4]: This is not a statement of fact but rather political opinion. In the case of renewables, the proposed infrastructure will only increase costs and destroy national prosperity.

Commented [LB5R4]: Added reference to NPS EN-1 paragraph 5.5.5 which refers. Existing wording to be retained to ensure recognition of need for balance.

Commented [LB6R4]: Wording now moved to table at section 6 to show alternative perspectives in relation to EN-1

Commented [LB7]: 5 km reinstated and wording added to clarify general parameter for an aerodrome's inclusion in scope of aviation impact assessments, not specific to Raydon Wings.

Commented [LB8R7]: Wording now moved to table at section 6 to show different positions in relation to consultation

~~alignment, National Grid failing to recognising the potential for the proximity of the infrastructure to impact aircraft flight patterns and aerodrome operations. In accordance! Following this failure to comply with EN-1 requirements, the operator of Raydon Wings aerodrome self was identified as a priority stakeholder for engagement in relation to aviation impact considerations. Since then National Grid has failed to engage with Raydon Wings in any useful or businesslike manner.~~

The chronology of National Grid's engagement with Raydon Wings 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 [7.18 2022 - Corridor and Preliminary Routeing and Siting Study \[APP-356\]](#)
 - 21 April – 16 June non-statutory consultation on the Preferred Route Corridor graduated swathe
 - ~~16 May written representation received from the operator raising concerns regarding potential Project impacts on Raydon Wings~~
 - ~~26 May written response by National Grid to operator representation, recognising concerns and requesting further information to inform impact assessment.~~
- 2023
 - Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the [7.20 2023 - Design Development Report for the Project \[APP-358\]](#)
 - 27 June – 21 August non-statutory consultation on the 2023 Preferred Draft Alignment
 - 25 July ~~10 minute~~ meeting at Raydon Wings aerodrome between National Grid, its appointed aviation consultants Alan Stratford and Associates (ASA), and the operator.
- 2024
 - Development of the 2024 Preferred Draft Alignment, responding to feedback and other studies, with significant changes including relocation of the Cable Sealing End (CSE) compound to the north of Raydon Wings to enable continued aviation activities, as described within the [7.21 2024 - Design Development Report for the Project \[APP-359\]](#) ~~but no further engagement, consultation or collaborative work with Raydon Wings~~
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
 - 25 April ~~30 minute~~ meeting between National Grid (with ASA) and the operator. Matters raised included:
 - Discussion of the aerodrome safeguarding plan defining a 4000m outer perimeter

Commented [LB9]: National Grid does not agree to proposed rewording - suggest removal of final two sentences from paragraph as alternative.

Commented [LB10]: Unable to verify

Commented [LB11R10]: Detail now within stakeholder position in table at section 6

Commented [LB12]: Suggest meeting of 25 April 2024 demonstrates engagement following development of 2024 Preferred Draft Alignment

Commented [LB13]: Unable to verify

Commented [LB14R13]: Detail now within stakeholder position in table at section 6

- Concerns regarding height
- and proximity of the preferred overhead line alignment including the CSE compound, and potential turbulence from Project infrastructure. Consideration of the proposed underground cable route and potential impacts, including during construction as well as interference with avionics
- 14 June written Statutory Consultation representation received from the airfield operator.

~~No feedback or response to the concerns expressed by Raydon Wings has been received. Only a statement to the effect that these will be ignored by National Grid and presented to the Inspectorate for a decision.~~

Commented [LB15]: Suggest development of proposed Project Alignment and subsequent engagements in 2025 relevant.

- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies.
 - 30 January – 3 March Targeted Consultation for Suffolk 6 location on proposed changes to the underground cable alignment
 - 25 February written Targeted Consultation representation received from the operator
 - 18 March email response sent from Project Team to operator feedback received during the Targeted Consultation
 - 25 March written response to Project Team email of 18 March received from the operator
 - 4 April email from Project Team proposing meeting to discuss operator feedback
 - 7 April operator email response stating inadequacy of consultation to date and accepting meeting proposal
 - 16 April email from Project Team proposing development of Statement of Common Ground / Stakeholder Agreement
 - 16 April email response stating need for operator endorsement, and requesting copy of provision of written aviation advice provided to National Grid
 - 25 April email from Project Team providing draft Stakeholder Agreement and draft technical drawings
 - 28 April email from Project Team providing Aviation Assessment Summary – Apr25
 - 29 April online meeting. Matters raised included:
 - Discussion of the draft Stakeholder Agreement and outstanding matters
 - Concerns regarding the adequacy of consultation to date, particularly in relation to the Targeted Consultation
 - Operator requirement for impact assessment to consider proposed as well as existing aerodrome operations
 - Continued concerns regarding position of CSE and associated potential impacts (including air turbulence)

- Concerns regarding underground cable (UGC) route and associated temporary impacts of construction on aerodrome operations
- 7 May operator email response to draft Stakeholder Agreement with 'red-line' comments (V.02) including:
 - Objection to inclusion of EN-1 references to net zero within introductory text
 - Comments regarding the inadequacy of consultation, including prior to the first non-statutory consultation and following the statutory consultation
 - Proposing the relocation of the CSE compound as compromise position, as well as engagement to minimise disruption of temporary works
- 19 May email response from Project Team with amended version (V.03) of Stakeholder Agreement and request for information to inform design change considerations regarding temporary works
- 23 May email from Project Team with amended version (V.04) of Stakeholder Agreement, referring to 2022 stakeholder engagement
- 28 May operator email response declining to agree V.04 Stakeholder Agreement reiterating comments regarding National Grid failure to adequately engage
- 30 May interim email response from Project Team providing requested link to [Planning Inspectorate Scoping Opinion \(December 2022\)](#)
- 9 June email response from Project Team with amended version (V.05) of Stakeholder Agreement, restructured to show matters not agreed, proposing to be presented to Planning Inspectorate to inform their understanding, and reiterating request for information
- 9 June operator email response declining for draft Stakeholder Agreement to be shared with Planning Inspectorate but welcoming future engagement regarding proposals, proposing focus on the location of the CSE compound.
- 4 July email response from Project Team with amended version (V.06) of Stakeholder Agreement, providing details of design development regarding the proposed CSE compound location, consideration of Civil Aviation Authority Airfield Advisory Team (CAA AAT) advice within impact assessment, and reiterating request for information as well as proposal to discuss temporary impacts of UGC construction. Technical drawing (Rev A) also issued.
- 3 October email from Project Team notifying operator of Planning Inspectorate acceptance of DCO application, publication of submitted [6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact \[APP-267\]](#) and requesting progression of Statement of Common Ground.

The operator's Relevant Representation submitted to the Planning Inspectorate on 8 October 2025 was published on 12 December 2025.

5. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
5.1				

6. Matters Currently Under Discussion

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
6.1	Legislative, Regulatory, Policy and Guidance Context	<p>The Stakeholder draws attention to the National Planning Policy Framework (NPPF) and, in particular, to the policies set out in the Overarching National Policy Statement for Energy (EN-1). The Stakeholder believes that, as set out, National Grid's Project proposals fail to take account of this policy to an adequate degree, for all aerodromes affected, not just Raydon Wings.</p> <p>The Stakeholder states that judgements on aerodrome safety must be based, <u>in the first instance</u>, on Civil Aviation Authority (CAA) publication CAP 168 'Licensing of Aerodromes and its subordinate CAP 738 'Safeguarding of</p>	<p>National Grid agrees that account must be taken of the Overarching National Policy Statement for Energy (EN-1), together with the National Policy Statement for Electricity Networks Infrastructure (EN-5), as the primary determining policies for the Project.</p> <p><u>In addition to the need for NSIPs to be developed collaboratively alongside aerodromes so that their safety, operations and capabilities are not adversely affected, National Grid recognises the reciprocal need, predicated on EN-1, which 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</u></p>	<p>National Planning Policy Framework, last updated February 2025</p> <p>NPS EN-1 Overarching National Policy Statement for Energy, November 2023</p> <p>EN-5 Electricity Networks National Policy Statement, March 2023</p>

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>Aerodromes', representing accepted standards for safe aerodrome operations, including in relation to obstacle safeguarding protocols.</p> <p><u>(The stakeholder maintains that National Grid has failed to properly engage or to take into account concerns raised by the stakeholder. Total engagement has not exceeded 45 minutes and correspondence (other than standard boiler plate acknowledgments) has been limited to one e-mail which essentially says that NG will make no changes to its proposals.</u></p> <p><u>(June 2024)</u> (June 2024)</p> <p><u>The Stakeholder has stated that EN-1 does not refer to net zero, and considers the stated benefits of new energy developments to be political opinion rather than fact.</u></p> <p><u>(May 2025)</u></p>	<p><u>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 (paragraph 5.5.5 refers).</u></p> <p>It is considered that 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 Raydon Wings aerodrome (along with other aerodromes identified as being in scope) as an aerodrome likely to be affected by the Project, in preparing and informing its impact assessments. Furthermore, it is the position of National Grid that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes.</p> <p>Whilst the National Policy Statements represent the primary planning policies for projects of this nature, it is acknowledged that account may be taken of the provisions of the National Planning Policy Framework (NPPF), including its recognition of the importance of maintaining a national network of General Aviation airfields, and their socio-economic value.</p>	<p>CAP 168 Licensing of Aerodromes, January 2022</p> <p>CAP 738 Safeguarding of Aerodromes, October 2020</p> <p>CAP 793 Safe Operating Practices at Unlicensed Aerodromes, July 2010</p> <p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p>

Commented [LB17]: Proposed change to move introductory text from section 4 to table to show different perspectives not agreed.

Commented [LB16]: Proposed relocation of this paragraph to 'Aerodrome Consultation' section

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>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 (Safeguarding of Aerodromes) and CAP 793 (Safe Operating Practices at Unlicensed Aerodromes). This is further described in relation to the aviation impact assessment methodology below.</p> <p>(April 2025)</p>	
			<p><u>It is suggested that, aside from alternative interpretations of EN-1 in relation to the need for and benefits of new energy infrastructure, the Stakeholder and National Grid both agree, in principle, to the importance of the aforementioned policies and guidance to the Project and its determination</u></p> <p>(June 2025)</p>	

Commented [LB18]: As agreed on 29 April

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>Section 15.2 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] sets out the planning policy context as well as the aviation-specific regulation and guidance National Grid considers relevant to the assessment of aviation impacts in relation to the Project. National Grid's approach is in accordance with national policy requirements, Compliance with aviation regulation and guidance forms the basis for National Grid's objective and robust approach.</p> <p>(January 2026)</p>	
6.2	Corridor and Preliminary Routeing and Siting		<p>Within the Scoping Report, and with regards to major accidents and disasters, National Grid recognised the potential for third party transport to impact infrastructure, which may lead to serious harm. As a consequence, National Grid stated it would consult aviation bodies and aerodromes that may be affected to understand potential impacts on their operations (paragraph 5.7.3 refers). This undertaking is consistent with the engagement approach taken, as described within ES Appendix 15.2. This is in</p>	<p>6.19 Scoping Report [APP-296] 6.20 Scoping Opinion [APP-297] 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p>

Commented [KZ19]: National Grid January 2026 position updates respond to NGC Relevant Representation

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>accordance with the Planning Inspectorate's Scoping Opinion which stated a standalone major accidents and disasters chapter was not required, but that any likely significant effects on users of airfields should be assessed within the ES (para. 3.13.13).</p> <p>The Corridor and Preliminary Routeing and Siting Study was undertaken to identify broad locations for the required infrastructure, resulting in a preferred corridor graduated swathe, which was subject to non-statutory consultation in 2022. The study recognised aviation and defence as sub-topics for consideration within the Options Appraisal (Table 3.3 refers) but related sites did not form a constraint to be avoided by a defined separation, considered to be a reasonable and responsible approach at this early stage of the route's development in view of the variable factors that could determine Project impacts on aviation. The 2022 non-statutory consultation on the graduated swathe enabled initial feedback to be received from airfield owners and operators. The 2023 Design Development Report describes how potential aviation impacts relating to Raydon Wings in particular were duly considered in</p>	<p>7.18 2022 - Corridor and Preliminary Routeing and Siting Study [APP-356]</p> <p>7.20 2023 - Design Development Report [APP-358]</p>

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>the subsequent development of the corridor into the 2023 preferred draft alignment (paras. 5.5.78 and 6.4.65 refer). Direct engagement with operators from the 2023 non-statutory consultation established the variable and specific characteristics of each site (such as aircraft types, activities and runway orientation) to enable comprehensive appraisals of Project impacts to be undertaken and inform further development of the proposed alignment. (January 2026)</p>	
6.3	Aerodrome Consultation and Safeguarding Plan	The Stakeholder considers that National Grid did not contact Raydon Wings at a sufficiently early stage (prior to early 2023), despite the proposed overhead lines passing directly across the approach to the main runway at a range judged likely to cause danger to aircraft take-off and landings. The Stakeholder comments that National Grid presented no alternative options for public/stakeholder consideration and appeared to have largely predetermined the route, primarily upon cost grounds. National Grid failed to recognise Raydon Wings existence until	<p>As described in Section 4- Following non-statutory consultation on the Preferred Route Corridor in 2022 (during which National Grid responded to the operator's written representation raising concerns regarding potential impacts), Raydon Wings was included with other aerodromes in the scope for further assessment with its runway end being located within 5 km of the Project's proposed overhead line alignment, recognising the potential for the proximity of the infrastructure to impact aircraft flight patterns and aerodrome operations. National Grid engaged Raydon Wings as the Project</p>	<p>5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]</p>

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>contacted by Raydon Wings during the first public engagement. The Stakeholder believes that National Grid did not, therefore, do adequate diligence and/or engagement prior to creating and publishing the graduated swathe. The Stakeholder suggests that this is strong evidence that a fair and proper process, which should involve stakeholders from inception, was not followed and that this breaches best practice protocols and Gunning Principles which should be expected of any national infrastructure project.</p> <p>(June 2024)</p> <p>The Stakeholder considers that National Grid has undertaken inadequate and improper engagement, failing to directly inform the aerodrome regarding statutory consultation and targeted consultation. The aerodrome's plans to expand aviation activities have been frozen as a consequence. The Stakeholder further cites National Grid's failure to follow the Gunning Principles.</p>	<p>design was developed including meeting the operator during the second non statutory consultation (July 2023) and the statutory consultation (April 2024) and once the airfield was identified as potentially affected by the Project. National Grid reflects that this consultation and engagement has enabled the Stakeholder's feedback to be considered during the further development of the design, with design changes implemented to minimise aviation impacts.</p> <p>The engagement outlined is consistent with engagement undertaken with other aerodromes identified as potentially impacted by the Project and is considered to be appropriate and proportionate in view of the scale and complexity of the Project as well as in accordance with the Gunning Principles.</p> <p>(May 2025)</p> <p>National Grid welcomes Raydon Wings' development of a Safeguarding Plan which has further informed consultation in relation to aviation impact assessments and appropriate mitigation measures, recognising that its primary function to provide a trigger to</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>(February 2025)</p> <p><u>The Stakeholder considers that National Grid failed to recognise Raydon Wings existence until contacted by Raydon Wings during the first public engagement. The Stakeholder believes that National Grid did not, therefore, do adequate diligence and/or engagement prior to creating and publishing the graduated swathe. The Stakeholder suggests that this is strong evidence that a fair and proper process, which should involve stakeholders from inception, was not followed and that this breaches best practice protocols and Gunning Principles which should be expected of any national infrastructure project.</u></p> <p><u>The stakeholder maintains that National Grid has failed to properly engage or to take into account concerns raised by the stakeholder. Total engagement has not exceeded 45 minutes and correspondence (other than standard boiler plate acknowledgments) has been limited to one e mail which essentially</u></p>	<p>prompt engagement was not required in this instance as consultation had commenced prior to the Plan's submission to the Local Planning Authority in April 2024.</p> <p>National Grid also agrees with the Raydon Wings position that safeguarding plans are not an absolute determination of where obstacles can be positioned relative to an aerodrome. National Grid considers that a nuanced, site-specific impact assessment approach is appropriate that assesses multiple factors, in addition to obstacle distances, and is informed by engagement with the operator as the party responsible for aerodrome safeguarding. This approach is further described in the methodology below.</p> <p>(April 2025)</p> <p>National Grid is confident that the consultation undertaken was fully compliant with the published Statement of Community Consultation and legislative requirements under the Planning Act 2008.</p> <p>(January 2026)</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p><u>says that NG will make no changes to its proposals.</u> <u>(April 2025)</u></p> <p><u>The Stakeholder considers the Raydon Wings Safeguarding Plan to not provide an absolute determination as to where obstacles can and cannot be placed relative to an aerodrome, but rather a formal trigger for the point at which consultation with the aerodrome operator is required in order to agree what may be possible.</u> <u>(June 2024)</u></p>		
6.4	<u>Aerodrome Safeguarding</u>	<p><u>The Stakeholder considers the Raydon Wings Safeguarding Plan to not provide an absolute determination as to where obstacles can and cannot be placed relative to an aerodrome, but rather a formal trigger for the point at which consultation with the aerodrome operator is required in order to agree what may be possible.</u> <u>(June 2024)</u></p>	<p><u>National Grid welcomes Raydon Wings' development of a Safeguarding Plan which has further informed consultation in relation to aviation impact assessments and appropriate mitigation measures, recognising that its primary function to provide a trigger to prompt engagement was not required in this instance as consultation had commenced prior to the Plan's submission to the Local Planning Authority in April 2024.</u></p> <p><u>National Grid also agrees with the Raydon Wings position that safeguarding plans are</u></p>	<u>Raydon Wings Safeguarding Plan</u>

Commented [LB20]: Proposed separation of safeguarding and consultation matters. Suggest in agreement on safeguarding.

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p><u>not an absolute determination of where obstacles can be positioned relative to an aerodrome. National Grid considers that a nuanced, site-specific impact assessment approach is appropriate that assesses multiple factors, in addition to obstacle distances, and is informed by engagement with the operator as the party responsible for aerodrome safeguarding. This approach is further described in the methodology below. (April 2025)</u></p> <p>National Grid does not dispute the operator's responsibilities for aerodrome safeguarding and has duly considered the operator's safeguarding plans as described above (April 2025 comment refers).</p> <p>National Grid is fulfilling its applicant responsibilities as defined in EN-1 in preparing an assessment of the impact of the Project on aviation.</p> <p>The impact assessments have been undertaken by National Grid's appointed specialist aviation consultants, who have substantial expertise in operational safeguarding evaluation at aerodromes</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>across the UK. The assessment methodology and impact assessment conclusions have been informed by consultation with aviation stakeholders, including operators and representative aviation bodies.</p> <p>(January 2026)</p>	
6.5	Aviation Impact Assessment Methodology and Key Assumptions	<p>The Stakeholder considers that, in common with CAA licensed aerodromes, unlicensed aerodromes may have obstacles that breach its safeguarded slopes. However, the risk presented by these obstacles must be considered and mitigated before the aerodrome operator permits flight operations to commence.</p> <p>Ultimately, it is the nature of flight operations at an aerodrome that will determine what represents a safe obstacle environment. At unlicensed aerodromes, the suitability of the obstacle environment is subjectively assessed by the aerodrome operator <u>but should not be any less safe than that found at an licensed aerodrome.</u></p> <p>(June 2024)</p>	<p>In accordance with its EN-1 defined responsibilities as a DCO applicant, and in agreement with the Raydon Wings position, National Grid’s Aviation Impact Assessment methodology has been developed to enable risk-based site-specific impact assessments for aerodromes potentially impacted by the Project. Its primary function 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.</p> <p>The methodology enables a bespoke appraisal, appropriate to each aerodrome, that considers a range of factors in addition</p>	

Commented [LB21]: 12May 2025: During our meeting of 29 Apr you raised that the assessment methodology did not appropriately consider the nature of proposed as well as existing flight operations at the aerodrome. As previously agreed, grateful if you could provide further details of proposed activities at Raydon Wings, as well as any supporting evidence to demonstrate levels of commitment (planning or license application reference numbers, for example - if applicable) to enable their consideration.

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>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 via consultation with operators and relevant aviation stakeholders, <u>and may include proposed operations where commitment is demonstrated</u>); and the surrounding context in terms of topography, existing obstacles (including other overhead lines) and neighbouring aerodromes.</p> <p>The assessments include consideration of 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, albeit not a regulatory requirement for unlicensed aerodromes. If CAP168 measures 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. National</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>Grid recognises, however, that aerodrome operators, with responsibility for safeguarding, will review the possibility of agreeing reasonable changes to operational procedures. (April 2025)</p>	
			<p>National Grid is in agreement with the operator that the assessment of impacts on licensed and unlicensed aerodromes should be considered according to equal parameters, hence the inclusion of CAP168 defined OLS infringement within the assessment considerations, as described above and within the ES Appendix 15.2. Following discussion of the operator's proposed operational activities at the aerodrome during the 29 April 25 meeting, National Grid requested further details of these activities in its email of 19 May to ensure consideration as an assessment factor (amending its SoCG position accordingly). This information has not been provided to the applicant. ES Appendix 15.2 explains the consideration of cumulative impacts as part</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>of the applicant’s overall impact assessment approach. (January 2026)</p>	
6.6	Proposed Project Alignment and Impact Assessment Conclusions	<p>The Stakeholder raises concerns regarding the proposed cable end sealing compound location and associated incoming overhead lines and pylons situated too close to the runway, creating undue hazards for aircraft making curved approaches using the aerodrome, were any loss of power to occur.</p> <p>The potential effect of air turbulence from the pylons (which is considered to have not been properly assessed by National Grid) and associated bunched cables and isolators on final approaches, and potential electrical interference to aircraft systems caused by passing within a few hundred feet of high voltage cables, are also raised. The Stakeholder maintains that these potential effects have not been properly or adequately considered by National Grid but could result in serious safety implications, especially given that there is residential property located close under the</p>	<p>National Grid’s Aviation Impact Assessment conclusions for Raydon Wings aerodrome include that, whilst the proposed overhead line alignment will represent a new obstacle in the vicinity, CAP168 OLS standards are met, with the exception of a minor penetration of the Inner Horizontal Surface (IHS). It is assessed that existing circuits can continue to be used, including to the north, overflying the overhead line at a safe height from which there would be a range of alternative landing sites in the event of an emergency.</p> <p>The locations of pylons and other structures associated with the overhead line are assessed to be sufficiently distanced from take-off and approach paths for aircraft not to be impacted by any wind turbulence effects.</p> <p>It has also been considered whether electromagnetic fields (EMF) produced from the overhead line might adversely impact aircraft avionics or other aircraft systems, compromising operational safety. It is</p>	<p>Aerodrome Assessment Summary Apr25; Technical Drawings (01_220101_96_Raydon Wings Airstrip – RevA)</p>

Commented [LB22]: Proposed re-ordering of information to enable position to be read chronologically.

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>approach path at the eastern end of the runway. The Stakeholder raised the requirement for satisfactory expert assessment of the potential for disruption to aircraft systems that might result from underground cables crossing the runway. (June 2024)</p>	<p>assessed that minimum clearances allowed for aircraft overflying or otherwise within the vicinity of the overhead line will enable aircraft to be sufficiently distanced to avoid unacceptable adverse effects. This assessment is justified by National Grid's direct experience of operating aircraft in very close proximity to live overhead lines (within tens of metres), while carrying out routine visual assessment regimes, with no impacts on instrumentation noted.</p>	
		<p>The Stakeholder raised that the proposed underground cable route cuts through the aerodrome's only runway and is bordered by a wide swathe of land allegedly required to support its installation. Furthermore, haul roads planned to support the construction of the cable end sealing compound and the installation of the underground cable would infringe the aerodrome operating surface requiring closure of the runway and the consequent cessation of operations. (February 2025)</p>	<p>National Grid anticipates magnetic fields of between 77-111 microteslas at 1 metre above ground may be produced by underground cables proposed at Raydon Wings airfield runway. In the absence of standards specifying maximum electromagnetic field strengths for aviation, National Grid has previously performed testing involving aircraft taxiing over operational cables at a comparable aerodrome and determined that Alternating Current (AC) interference did not impact aircraft avionics in that instance. Magnetic compasses are unaffected by AC fields. AC operates at 50 hertz while aviation electrical supply, when not direct current (DC) typically</p>	
		<p>The Stakeholder raised the requirement for satisfactory expert assessment of the potential for disruption to aircraft systems</p>		

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>that might result from underground cables crossing the runway. (June 2024)</p> <p><u>The Stakeholder maintains that these potential effects [associated with the proposed CSE compound location and potential turbulence effects] have not been properly or adequately considered by National Grid but could result in serious safety implications, especially given that there is residential property located close under the approach path at the eastern end of the runway.</u> <u>Furthermore, haul roads planned to support the construction of the cable end sealing compound and the installation of the underground cable would infringe the aerodrome operating surface requiring closure of the runway and the consequent cessation of operations.</u> (May 2025)</p>	<p>operates at significantly higher frequencies in the megahertz range, so no interference is likely by that mechanism. Also, electromagnetic field interference on radio altimeters, which operate in the gigahertz range, is not expected from power transmission sources. Furthermore, it is recognised that the aircraft types known to utilise Raydon Wings are unlikely to be fitted with radio altimeters, or reliant on Instrument Flight Procedures (IFPs) that require runway protection or allow Autoland capability. It should be noted that electromagnetic fields produced by the Project cables are unlikely to be distinguishable from those generated by the aircraft’s own electrical systems and therefore not disruptive to instrumentation. (April 2025)</p> <p>Potential mitigations to minimise impacts of construction (including as associated with the haul road) are further addressed in ‘Mitigation Measures’ below. (May 2025)</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>The information within Table A15.2.9 of ES Appendix 15.2 was shared with the operator on 28 April 2025 and discussed during the meeting of 29 April. In addition, conclusions regarding partial CAP168 compliance and associated infringement of surfaces were provided and discussed. Whilst the operator has not confirmed the acceptability of the partial CAP168 compliance / minor infringement, they have not provided any alternative information to challenge assessments or evidence risk or harm of continuing existing operational procedures. (January 2026)</p>	
6.7	Mitigation Measures	<p>The Stakeholder has suggested an alternative location for the cable end sealing station, 1.5km north, recognised to be inside the north-east corner of the safeguarding zone but believed to be workable. Alternatively, by way of potential compromise, a significant improvement could be achieved by locating the cable end sealing compound 150 metres further north and to the north of the disused railway line where the ground level is significantly lower. This</p>	<p>EN-5 makes clear that the Government considers overhead lines to be the strong starting presumption for electricity network development. In assessing the need for an alternative, in this instance the extension of proposed underground cables to enable further relocation of the CSE compound to the north, there was considered to be insufficient policy justification for the proposed change to the alignment. The current location is technically preferred.</p>	

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		<p>would also move the pylon closest to the aerodrome further north reducing any turbulence effects. It would also minimise the need for haul roads on the aerodrome and surrounding surfaces as these would necessarily be located north of the disused railway line. This proposal has been rejected out of hand by NG without discussion.</p> <p>The Stakeholder considers that the aerodrome would be able to work around the temporary disruption caused by works to install underground cables <u>(provided always that National Grid worked constructively with the aerodrome to minimise disruption)</u>, albeit with the expectation of compensation for the period of potential operations disruption. (June 2024)</p> <p><u>Alternatively, by way of potential compromise, a significant improvement could be achieved by locating the cable end sealing compound 150 metres further north and to the north of the disused railway line where the ground level is</u></p>	<p>In view of the assessment conclusions, further changes to the Project <u>overhead line</u> design have not been implemented as are not considered to be appropriately justified by the minimal potential adverse impacts on the operation and safety of the aerodrome.</p> <p>The operator may consider operational procedure changes, including to enhance pilot awareness of the overhead line as an obstacle, and in relation to aerobatic display aircraft practicing at low level.</p> <p>All affected landowners will be compensated for any temporary or permanent losses on a case-by case basis, and in line with the compensation code and or any other relevant legislation. (March 2025)</p> <p>As described with the Design Development Report (April 2024) the decision to change the CSE compound location to its proposed location involved evaluation of alternative sites (including to the north of the disused railway line) and consideration therein of a number of potential environmental effects, including</p>	

Commented [LB23]: Proposed re-ordering of information to enable to be read chronologically.

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		<p><u>significantly lower. This would also move the pylon closest to the aerodrome further north reducing any turbulence effects. It would also minimise the need for haul roads on the aerodrome and surrounding surfaces as these would necessarily be located north of the disused railway line. This proposal has been rejected out of hand by NG without discussion.</u></p> <p>(May 2025)</p>	<p>aviation impacts, balanced with technical benefits and capital cost requirements, in accordance with the Horlock Rules. In view of the aviation impact assessment conclusions, the re-opening of this design and siting decision is not considered to be justified. National Grid would reconsider its position, should compelling information become available.</p> <p>National Grid recognises the order limits surrounding the proposed underground cable route are defined as such to ensure sufficient flexibility during construction. To minimise temporary disruption to the aerodrome associated with works to install the proposed underground cables, National Grid will explore the potential for slight adjustments to be made to its design and/or during construction, to be informed by detailed feedback from the operator regarding aerodrome operations.</p> <p>(May 2025)</p> <p>National Grid's position remains that it is available to receive additional or alternative evidence to justify changes to the proposed</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			Project alignment, as well as to discuss alternative mitigation measures, including of temporary impacts arising at a result of underground cable construction. (January 2026)	

7. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Raydon Wings Aerodrome

Name: _____

Position: _____

Date: _____

National Grid plc
National Grid House,
Warwick Technology Park,
Gallows Hill, Warwick.
CV34 6DA United Kingdom

Registered in England and Wales
No. 4031152
nationalgrid.com