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Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.3.36 Draft Statement of Common Ground - Priory Farm
Airfield**

Final Issue A

February 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Priory Farm Airfield

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 Priory Farm Airfield 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 has been prepared by National Grid in seeking the agreement of the owner and operators of Priory Farm Airfield

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 an 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 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. Priory Farm Airfield 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 alignment, recognising the potential for the proximity of the infrastructure to impact aircraft flight patterns and aerodrome operations. In accordance with EN-1 requirements, the owner and operator of Priory Farm Airfield was identified as a priority stakeholder for engagement in relation to aviation impact considerations.

The chronology of National Grid's engagement with Priory Farm Airfield 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 [7.18 2022 - Corridor and Preliminary Routeing and Siting Study \[APP-356\]](#)
 - 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 [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 meeting at Tibenham aerodrome between National Grid, its appointed aviation consultants Alan Stratford and Associates (ASA), the owner and operator of Priory Farm Airfield, members of Norfolk Gliding Club (operators of neighbouring Tibenham aerodrome) and representatives from the Civil Aviation Authority Airfield Advisory Team (CAA AAT).
- 2024
 - Development of the 2024 Preferred Draft Alignment, considering feedback and other studies, as described within the [7.21 2024 - Design Development Report for the Project \[APP-359\]](#)
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
 - 10 May meeting between National Grid (with ASA) and the Operator. Matters raised included:
 - The CAA's CAP793 guidance recommendation regarding obstacles over 50m not being sited within a radius of 2,000m of the airfield centre point.
 - Aviation impact assessments and calculated overhead line clearance distances, including in instances of engine failure.
 - Residual Operator concerns regarding visibility of the overhead line and ability to fly existing circuits of the aerodrome
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies
 - [23 June 2025 letter from National Grid to the Operator regarding proposed SoCG and providing technical drawings with embedded aerodrome assessment summary tables.](#)

- 26 June letter from the Operator to National Grid in relation to the draft SoCG, stating unable to sign the document in its current form as there remain substantive matters which are not agreed. Specifically:
 - o Aviation safety concerns remain unresolved
 - o Penetration of Inner Horizontal Surface (CAP 168)
 - o Increased risk to aircraft operations
 - o Unacceptable burden of mitigation on the airfield
- 7 July – 25 July emails between National Grid and the Operator regarding the SoCG process, information provision and meeting arrangements
- 7 August meeting in-person between National Grid (with ASA) and representatives of Tibenham and Priory Farm aerodromes. Matters discussed included:
 - o Route development rationale and consideration of Operator, CAA, BGA and GAAC advice therein
 - o Aviation safety risk assessments, including consideration of Engine Failure After Take Off (EFATO), information sharing, and cumulative impacts
 - o Transmission technologies cost comparisons, including with regards to operator-proposed aviation impact mitigation options
 - o Engagement next steps, including sharing of assessment information and further development of SoCG
- 10 September email from National Grid providing draft minutes for 7 August meeting for review and updated draft SoCG to reflect matters discussed. Updated aerodrome assessment summary provided also.
- 17-18 September emails between National Grid and the Operators regarding draft meeting meetings, progression of SoCGs and proposed next meeting dates, providing updated aerodrome assessment summary
- 3 October email from National Grid notifying the Operator of Planning Inspectorate acceptance of the Project DCO application, publication of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] and proposal of meeting to progress the SoCG
- 3 October – 27 October emails between National Grid and the Operators regarding technical questions, aerodrome impact assessments, agent of change responsibilities and delays to progression of SoCG discussions
- 31 October email from National Grid responding to technical questions and airfield assessment summary comments (see Annex A) and referencing published 5.15 Design Development Report [APP-122]
- 3 December to 15 January 2026 emails between the Operators and National Grid regarding provision of information, mitigation proposals and progression of SoCG

Commented [LB1]: Suggest this detail summarising letter content is added here.

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- Relevant Representations submitted by the owner and the Operator of Priory Farm aerodrome to the Planning Inspectorate were 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 | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|-----|--|--|---|--|
| 6.1 | Legislative, Regulatory, Policy and Guidance Context | <p>Ignoring the Civil Aviation Authority's CAP 793 guidance for safe operating practices at unlicensed aerodrome, which recommends that there are no obstacles greater than 150ft [50m] above the average runway elevation within 2,000m of the runway mid-point, will cause or be an adverse factor in an air accident at Priory Farm Airfield.</p> <p>(May 2024)</p> | <p>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 Priory Farm Airfield as an aerodrome likely to be affected by the Project, as well as relevant aviation stakeholders including the CAA AAT, in preparing and informing impact assessments. Furthermore,</p> | <p>CAP 793 Safe Operating Practices at Unlicensed Aerodromes, July 2010; NPS EN-1 Overarching National Policy Statement for Energy, November 2023 EN-5 Electricity Networks National</p> |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|--|---|---|
| | | <p>Priory Farm does not agree that the proposed development poses no material increase in aviation risk.</p> <p>Specifically:</p> <ul style="list-style-type: none"> The alignment places new tall infrastructure within 2,000 metres of the runway midpoint and exceeds 150ft in height, in direct contradiction of CAP 793 guidance. The proposed infrastructure penetrates the inner Horizontal Surface as defined in CAP 168, which National Grid acknowledges. The safety assessments provided are based on idealised conditions and do not reflect actual circuit procedures, emergency contingencies, or microlight and low-performance aircraft operations. National Grid’s proposed mitigation measures place responsibility on us as the airfield operator rather than the develop, which is not acceptable. <p>We don’t see evidence that your proposal “...has been designed where possible, to</p> | <p>the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of the aerodromes.</p> <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 explained in relation to the aviation impact assessment methodology and key assumptions below. (March 2025)</p> <p>In response to the Priory Farm Relevant Representation, and as previously stated, National Grid considers its approach to be consistent with the instructions and guidance for an applicant as described within the energy NPSs, and particularly Section 5 of EN-1</p> | <p>Policy Statement, March 2023 CAP 168 Licensing of Aerodromes, January 2022 CAP 738 Safeguarding of Aerodromes, October 2020 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p> |

Commented [LB2]: Agreed need to amend this sentence to recognise refers to overall Project, not Priory Farm aerodrome specifically.

Commented [LB3]: Priory Farm to consider providing detail of its Relevant Representation with the Priory Farm position for all matters, as necessary

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|-----|----------------------|---|---|---|
| | | <p>minimise adverse impacts on the operation and safety of the aerodrome.”</p> <p>Priory Farm Airfield has communicated clearly and in writing that any increase in risk is unacceptable and that this infrastructure presents an unjustified hazard to flight safety. That position remains unchanged.</p> <p>(July 2025)</p> | <p>(relating to civil aviation), which have taken account of the NPPF and PPG, where appropriate. This is set out within Section 15.2 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP267] which also describes the aviation-specific regulation and guidance National Grid considers relevant to the assessment of aviation impacts in relation to the Project.</p> <p>(January 2026)</p> | |
| 6.2 | Consultation to Date | <p>Priory Farm is concerned that feedback previously provided has not been taken into consideration, concerns raised have not resulted in changes to the Project design, and that the consultation process is therefore unsatisfactory.</p> <p>(August 2025)</p> | <p>National Grid has noted the stakeholder's concerns regarding consultation and the lack of design changes implemented in response but considers its position to be justified by the impact assessment (see Impact Assessment Conclusions below).</p> <p>It recognises that, as for Priory Farm aerodrome, in locations where design changes have not been implemented, concerned parties might infer that their views have not been considered — this is not the case, as illustrated by the Design Development Report which refers to feedback</p> | <p>5.1 Consultation Report - Appendix E: Statement of Community Consultation (SoCC) and supporting evidence [APP-071]</p> <p>7.20 2023 - Design Development Report for the Project [APP-358]</p> <p>7.21 2024 - Design Development Report</p> |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|--|--|---|
| | | | <p>received and consideration of effects on Priory Farm aerodrome— (September 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>Any design changes must be and have been justified by the impact assessment, which has also been informed by stakeholder engagement (6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact refers). The Design Development Reports detail how consultation feedback regarding potential impacts on Priory Farm airfield has been taken into consideration during the evolution of the Project design. An Aerodrome Assessment Summary and technical drawings to inform engagement were shared in June 2025. The key information within these documents was published as part of the Environmental Statement Appendix 15.2 – Review of Aviation Impact [APP-267] in October 2025.</p> | <p>for the Project [APP-359] 5.15 Design Development Report [APP-122]</p> |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|-----|--|---|---|------------------------|
| 6.3 | Aviation Impact Assessment Methodology and Key Assumptions | <p>There appears to be an overreliance on theoretical modelling:</p> <ul style="list-style-type: none"> All of your clearance assumptions rely on idealised aircraft performance and standardised circuit behaviour. But real-world conditions – wind shear, engine issues, human error, bird activity – are NOT factored in. Your assessment assumed ideal climb-outs and fixed circuits, but light aircraft regularly depart or return using modified paths based on wind, traffic, or emergencies. A model that only covers textbook operations does not address real safety. There has been no meaningful consultation with the pilots who fly from here every week. The assessments do not reflect the way real flights operate, | <p>National Grid does not consider any key information to be missing or preventing progression of engagement. (January 2026)</p> <p>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.</p> <p>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</p> | |

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|----|-------|---|---|------------------------|
| | | <p>particularly for microlights or low-performance aircraft.</p> <ul style="list-style-type: none"> We would also add that Priory Farm has published procedures both online and through popular navigation aids such as SkyDemon and Pooleys. Utilising these aids it is difficult to see how the pylons can have anything but a significant adverse effect on both our 500' and 1,000' circuits. It should also be obvious that the proximity of Tibenham leaves zero margin for movement eastwards. <p>(July 2025)</p> <p><u>Priory Farm raised concerns that details of impact assessments have not been shared with the operator or published.</u> (August 2025)</p> | <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 (recognising operational deconfliction constraints).</p> <p>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 measures are met, the proposed overhead line alignment is considered to have an acceptable impact on the aerodrome's operations and no further</p> | |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|---|---------------------------|
| | | | <p>changes are considered likely to be necessary.</p> <p>(March 2025)</p> <p><u>National Grid is receptive to feedback regarding the methodology and key assumptions, and welcomes the opportunity to test these using 'real world' data to ensure a robust and objective approach. Notwithstanding National Grid's stated position in relation to CAP 793 parameters, we would be grateful for Operator clarification of what would be an acceptable clearance, and further welcome the sharing of Operator data, including published information to ensure it has been duly considered.</u></p> <p><u>(August 2025)</u></p> <p><u>National Grid has submitted a Review of Aviation Impact as an appendix to the Environmental Statement accompanying the DCO application. This appendix describes National Grid's aviation assessment scope, approach and conclusions, as outlined in</u></p> | |

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|-----|--|--|--|---|
| | | | <p>relation to Priory Farm within this SoCG. Should the DCO application be accepted for examination, the appendix will be published by the Planning Inspectorate, and National Grid will share the document with operators. (September 2025)</p> <p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact explains how relevant CAA guidance, as well as consultation with aviation bodies and operators, has informed the development of the assessment methodology. (January 2026)</p> | |
| 6.4 | Proposed Project Alignment and Impact Assessment Conclusions | <p>Safety concerns regarding the proximity of the overhead line to Priory Farm Airfield, relating to overflight clearances, including in instances of engine failure. Concerns regarding impacts on existing operational procedures including existing circuits. (May 2024)</p> <p>We see little evidence that “Deconfliction of interactions in flight procedures between</p> | <p>National Grid’s Aviation Impact Assessment conclusions for Priory Farm Airfield include that, whilst the Project 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). Distances from the runway ends to the proposed overhead line alignment are assessed as sufficient to enable safe clearance margins during take-off and landing. Whilst current circuits would involve</p> | <p>Technical Overflight Clearance Drawings - 01_220101_92_Priory Airstrip RevA; Airfield Impact Assessment Summary – Priory Farm v3</p> |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|--|---|------------------------|
| | | <p>the aerodrome and Tibenham aerodrome has been considered within the assessment”.</p> <ul style="list-style-type: none"> • There is an admitted penetration of protected airspace (Inner Horizontal Surface),however ”minor” it may be described; • The guidance of CAP 793,which is directly relevant to unlicensed airfields such as ours, is being sidelined; • The operational margins presented are based on idealised circuits and standardised climb-outs/approaches, and do not reflect real-world variability, especially under emergency conditions; • The proposed mitigation - that we consider altering our operational procedures – places the burden of risk mitigation on the airfield, rather than the developer introducing the hazard. <p>Priory Farm Airfield is used by low-performance,light and microlight aircraft</p> | <p>overflight of the overhead line, this is assessed to be from a safe height, in accordance with normal practices.</p> <p>Furthermore, it is assessed that the position of the overhead line would have minimal impact on aircraft returning to the airfield in an emergency. Deconfliction of interactions in flight procedures between the aerodrome and Tibenham aerodrome has been considered within the assessment.</p> <p>(March 2025)</p> <p>National Grid recognises that, as a result of its presence as an obstacle, the Project would increase risk to aerodrome operations. Through the aerodrome-specific impact assessments, National Grid has detailed and quantified the extent of any impacts, and in the case of Priory Farm, has concluded impacts are not significant as clearances are sufficient to enable safe operational margins. National Grid has sought Operator agreement of risk acceptability. As the Operator has not agreed the impact assessment conclusions, National Grid has requested feedback on what risk thresholds would be <u>acceptable</u>.</p> | |

Commented [LB4]: The National Grid SoCG position within the ‘Aviation Impact Assessment Methodology and Key Assumptions’ matter of August 2025 refers, as well as discussions at our 07/08/25 meeting, and the more recent email of 31/10/25 .

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|-----|---------------------|---|---|------------------------|
| | | <p>which operate with far narrower margins than your modelling implies. Emergencies, go arounds, and weather-related deviations are all routine occurrences. Adding tall infrastructure within the CAP 793 safeguarding radius presents an unacceptable elevation in operational risk.</p> <p>We therefore restate our objection to the current alignment and urge a revision that fully avoids CAP 793 breach and eliminates incursion into the IHS.</p> <p>(July 2025)</p> | <p>(January 2026)</p> | |
| 6.5 | Mitigation Measures | <p>NG are introducing a new obstacle and expecting us to mitigate your risk. That is not acceptable.</p> <p>(July 2025)</p> | <p>The Operator may wish to consider operational procedure changes, including to enhance pilot awareness of the overhead line as an obstacle, especially in relation to climb and descent progress.</p> <p>(March 2025)</p> <p><u>As reflected within the 'Legislative, Regulatory, Policy and Guidance Context' position above, National Grid recognises its</u></p> | |

| ID | Issue | Priory Farm Airfield position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|--|---------------------------|
| | | | <p><u>responsibilities as an applicant to include appropriate mitigation measures as an integral part of the proposed development (EN-1 para. 5.5.43 refers), understanding the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes (para. 5.5.50 refers).</u></p> <p><u>EN-5 makes clear that the Government considers overhead lines to be the strong starting presumption for electricity network development. In considering the need for an alternative, National Grid must fulfil its statutory duties and obligations to balance this with the need to be economic, efficient and to keep costs down in the interests of bill-paying consumers.</u></p> <p><u>In view of the assessment conclusions, changes to the Project 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.</u></p> <p><u>National Grid is keen to support Operator consideration of mitigations, such as changes to operational procedures, as well as</u></p> | |

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|----|-------|---|---|---------------------------|
| | | | <p><u>subsequent implementation of agreed mitigations, as appropriate.</u> <u>(August 2025)</u></p> <p>National Grid's position remains that substantial changes to the Project's design as mitigation measures are not justified by the assessed aviation impact.</p> <p>National Grid remains ready to explore alternative mitigations and has previously offered support to the Operator's consideration of reasonable operational measures to address the presence of the Project as an obstacle, such as enhancing pilot situational awareness. In particular, National Grid has raised its willingness to discuss the integration of marker balls to Project infrastructure to address visibility concerns.</p> <p>(January 2026)</p> | |

7. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Priory Farm Airfield

Name: _____

Position: _____

Date: _____

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