



# Norfolk Gliding Club Ltd

Tibenham Airfield, Diss, Norfolk, NR16 1NT  
www.norfolkglidingclub.com  
admin@norfolkglidingclub.com  
T:01379 677207



## Norwich to Tilbury EN020027

### Response to documents

LIR EN020027-001433

LIR EN020027-001533

Document 8.3.37

### Document 6.15.A2 Environmental Statement Appendix 15.2

Relevant Representation Reference Number [REDACTED]

### Summary

This response submitted by Mr A Griffiths on behalf of Norfolk Gliding Club (NGC) is intended to supplement the Local Impact Reports (LIR) produced by Norfolk County Council (NCC) and South Norfolk Council (SNC) submitted by them under deadline 1

The issues raised in both LIRs that refer to NGC are complemented by reference to our on-going dialogue with National Grid and our offers to host the resumed consultation of August 7<sup>th</sup> 2025 after its adjournment to allow National Grid the time to supply the withheld documents

Some of the issues with the draft SoCG are identified as an example and the offer to host a resumed consultation with National Grid and the two airfields with the prior provision of the withheld documents is reiterated

The response by National Grid to the queries raised on our behalf by the General Aviation Awareness Council (GAAC) that arose from their table A15.2.4 is also reviewed and concludes, in the interests of aviation safety, that the proposed pylon route should be realigned or undergrounded within the vicinity of Tibenham airfield

That position is supported by Dr Mark Eddowes of Eddowes Aviation Safety Ltd in his assessment of the aviation safety impacts posed by the proximity of the proposed pylon route to Tibenham which was submitted with our written representation under deadline 1

### **Norfolk County Council - Local Impact Report EN020027-001433**

From the first consultation in 2023, Norfolk Gliding Club has identified the aviation safety concerns that the proposed route represents. Alongside Norfolk County Council those concerns have been and continue to be supported by many aviation bodies and national planning guidelines.

Since the receipt of the draft Statement of Common Ground and Airfield Assessment Summary from National Grid in July 2025, Norfolk Gliding Club has endeavoured to resolve the aviation safety issues contained in both documents as identified in paragraph 4.4 of the Norfolk County Council's Local Impact Report following the adjourned consultation of August 7<sup>th</sup> 2025

### **South Norfolk Council - Local Impact Report EN020027-001533**

Norfolk Gliding Club have repeatedly advised National Grid since the first consultation of 2023 that the proximity of the proposed pylon route would have an adverse impact on both the safety and financial operations of the airfield as outlined in pages 447, 463 and 495 of the South Norfolk Council's Local Impact Report

Had the agreed documents been supplied by National Grid at the August 7<sup>th</sup> 2025 consultation then it is quite probable that some of these impacts might have been resolved but the decision to withhold them resulted in the meeting being adjourned and as yet they are still outstanding

### **August 7<sup>th</sup> Consultation - adjourned**

Following the adjournment of this consultation to allow National Grid time to provide the withheld documents, Norfolk Gliding Club have repeatedly offered to host a resumed meeting

This meeting would then allow Norfolk Gliding Club, Priory Farm Airfield and National Grid to work together and produce agreed versions of the SoCG and AAS for both airfields but those offers have been declined

Appendices A – C show some of the emails related to this

## National Grid – Draft Statement of Common Ground, Document 8.3.37

Norfolk Gliding Club do not agree to the Draft Statement of Common Ground and Airfield Assessment Summary submitted by National Grid as part of deadline 1.

Extract from the SoCG

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*

*– 13 June written representation from General Aviation Awareness Council (GAAC) on behalf of the Operator raising concerns regarding the proximity of the Project to the aerodrome*

~~*– There was no formal NG/NGC consultation in 2022. The NG team turned up at the Tibenham village hall and I understand talked in general terms to anyone from the village who wished to discuss the project.*~~

~~*– In fact, it is believed that NG ignored all airfields in this initial consultation phase and had they included them in their initial draft alignment would have been different and avoided a lot of the issues we now face*~~

In a previous version of the SoCG these last two sentences were accompanied by a note (referenced LB5) from National Grid suggesting that they should be removed and entered under a section with the title 'matters under discussion'

As pointed out in my email dated February 9<sup>th</sup> 2026 (Appendix A) it is not a matter for discussion, it is a matter of fact

The number of amendments within the current draft SoCG are now such that even the tracked changes have changes making it difficult to determine the relative positions of applicant and stakeholder

Therefore, Norfolk Gliding Club and Priory Farm Airfield continue to offer to host a resumed consultation following receipt of the withheld documents at which an agreed SoCG and AAS can be developed for both airfields

## Document 6.15.A2 Environmental Statement Appendix 15.2

Within the Written Representation submitted on behalf of Norfolk Gliding Club, appendix O reviews the aviation impact assessment contained within appendix 15.2 and uses the paragraph numbers quoted from the original document for ease of cross reference

Referring to paragraph 15.3.8

*In table A15.2.1 there are headings IR04, IR05 and DCO. Whilst DCO is shown to stand for Development Consent Order in the Abbreviations List, there is no mention of the other two. The GAAC has on our behalf written to NG on the advice of the ExA but has yet to receive a reply*

The GAAC has now received a reply which states

*Table A15.2.1 makes reference to distances from the closest point of aerodrome runways to the overhead line alignment (in metres). Three iterations of the alignment are shown to illustrate changes to the design, which are named IR04, IR05 and DCO in the document. The definitions of these are:*

***IR04** – The 2023 preferred draft alignment, subject to non-statutory consultation in 2023*

***IR05** – The 2024 preferred draft alignment, subject to statutory consultation in 2024*

***DCO** – The proposed Development Consent Order overhead line alignment*

*As you rightly recognise, Table A15.2.4 provides incorrect references to paragraphs within the same report. To confirm:*

*Item 5 – Brook Far – para. 4.2.1 should refer to para. 15.4.2*

*Item 6 – Chase Farm – para. 4.2.3 should refer to para. 15.4.4*

*Item 15 – Priory Farm – para. 4.2.7 should refer to para. 15.4.9*

*Item 16 – Raydon Wings – para. 4.2.10 should refer to para. 15.4.12*

*Item 18 – Thurrock – para. 4.2.17 should refer to para. 15.4.19*

*Item 19 – Tibenham (Norfolk Gliding Club) – para. 4.2.20 should refer to para. 15.4.22*

*We recognise the abbreviations within Table A15.2.1 would benefit from definition, and propose to provide this, as well as to undertake the correction of the Table A15.2.4 references.*

*With best wishes.*

*Yours sincerely*

**Community Relations Team**

Norwich to Tilbury

**nationalgrid**

Aviation safety has been at the root of all concerns expressed by Norfolk Gliding Club ever since the first consultation in 2023. The comment that

‘the abbreviations within Table A15.2.1 would benefit from definition’

demonstrates yet again the attitude of National Grid in terms of withholding information and addressing this significant issue

Furthermore, National Grid's aviation consultants are well aware of the Civil Aviation Authority's (CAA) guidelines with respect to Engine Failure After Take-Off (EFATO) and similar emergencies. These guidelines state that in the event of such an emergency, the pilot should land straight ahead within a splay of +/- 30° either side of the runway centreline and that area should extend 3km from the end of the runway

If that emergency were to result in an aborted aerotow then there would be two aircraft (the towing aeroplane and the glider) seeking to make an emergency landing within the same area

Table A15.2.1 shows that for Tibenham that distance is less than 2km

Further CAA guidelines widen that splay from +/- 30° for airfields such as Tibenham where training is taking place. Appendix D is reproduced from the Written Representation to show how the current pylon route proposal would impact a splay of +/- 50°

In addition, the CAA advise that only the airfield operator holds expert opinion as to the operational safety where new obstacles are being proposed.

In terms of mitigation, Norfolk Gliding Club consider that the proximity of the proposed route would make operations from runways 26 and 33 unsafe and National Grid as the 'agent of change' should either realign the proposed route to outside the Tibenham 5km safeguarding zone or underground the route within the zone

## Appendix A

Email to National Grid dated Feb 9<sup>th</sup> 2026

**From:** [REDACTED]

**Sent:** 09 February 2026 17:14

**To:** [REDACTED] [REDACTED]@lstc.co.uk>

**Cc:** Brown, David [REDACTED]@bartaby.org

**Subject:** Re: National Grid's Norwich to Tilbury Project: Draft SoCG for Review and Comment in Advance of Planning Inspectorate Deadline

Good Morning Ms [REDACTED]

On initial reading of this version of the SoCG I see that you have crossed through many of my previous comments

I understand from a senior planner that you have no right to do this therefore how do you want me to proceed and what assurance do we have that whatever we add is not crossed out, deleted or redacted in the version submitted to the inspectorate

As an example, your note LB5 suggests moving my comment with regard to the absence of any consultation with NGC in 2022 to matters under discussion - This is totally wrong, there was no consultation and we do not agree that it is a matter for discussion, it is a matter of fact

This is the very reason we offered to meet at Tibenham, to develop this document jointly and avoid this sort of misrepresentation.

If, as I read it, the rest of the document follows a similar vein then it is going to take some time to resolve these matters before the submission deadline

We are also still waiting for the withheld documents and until they have been delivered, we will not be able to agree any form of this document, the aviation impact assessment or the minutes of the August meeting

Regards  
Tony Griffiths  
Safeguarding Officer  
Norfolk Gliding Club

## Appendix B

### National Grid email dated Feb 27<sup>th</sup> 2026

From: [REDACTED]@lstc.co.uk

To: [REDACTED]

Sent: Friday, February 27th 2026, 19:08

Subject: RE: National Grid's Norwich to Tilbury Project: Draft SoCG for Review and Comment in Advance of Planning Inspectorate Deadline

Dear Mr Griffith

Further to our previous correspondence and noting your position relating to concerns regarding proposed amendments, National Grid yesterday submitted the draft SoCG to the Examining Authority as per our intention to respond to their request. This draft includes unresolved proposed tracked changes and comments between parties. Pdf and Word copies of the SOCG are attached.

National Grid remains eager to progress engagement and resolve outstanding matters. I will be in contact as soon as possible with proposals for next steps.

Kind regards,

[REDACTED]

## Appendix C

### Reply to National Grid dated Mar 3<sup>rd</sup> 2026

Dear Ms [REDACTED]

I can confirm receipt of your draft SoCG submitted by National Grid to the Planning Inspectorate in accordance with deadline 1 and note that it is a 'draft' and not an 'agreed' version contrary to their guidelines

However, whilst Norfolk Gliding Club remains willing to engage constructively during this next phase of the process, for that engagement to be meaningful it needs to focus on resolving the outstanding matters that have consistently prevented agreement.

Prior to the consultation meeting of August 7<sup>th</sup> 2025, you agreed to the agenda which in the first three items stated that National Grid would provide written statements on the following matters

#### **Item 1 – Route Development Rationale**

National Grid to provide a documented statement (with copies to both Norfolk Gliding Club and Priory Farm Airfield) explaining why the expert guidance from the Civil Aviation Authority (CAA), British Gliding Association (BGA), General Aviation Awareness Council (GAAC), and others was disregarded in favour of the less experienced advice of ASA when developing the proposed pylon route near Tibenham.

#### **Item 2 – Aviation Safety: EFATO and Aborted Aerotow Risk Mitigation**

Engine failure after take-off (EFATO) and the danger of aborted aerotows represents the most serious aviation safety risk to our pilots given the proposed alignment's proximity to both airfields. As the airfields cannot be relocated, we require National Grid, as the 'Agent of Change', to present mitigation proposals to address this hazard. As stated previously, our position is that mitigation should take the form of:

- A re-alignment of the route to beyond the Tibenham 5 km safeguarding zone, or
- Undergrounding of the route within the safeguarding zone.

#### **Item 3 – Cost Comparisons**

We request that National Grid provide the following cost information for each of the route configurations:

- The cost of the current proposed route segment through the 5 km safeguarding zone.
- The cost of re-aligning the route outside the 5 km safeguarding zone.
- The cost of undergrounding the route as it passes through the 5 km safeguarding zone.
- The overall cost of the full Norwich to Tilbury project.

At the meeting you announced that National Grid would not be complying with those three agreed items but intended to treat them as items for discussion. Following a discussion around the topics, the meeting was adjourned to allow National Grid time to reconsider and provide the agreed information which as you know has never happened

Subsequent to the adjournment, from September 2025 through to February 2026, as a demonstration of our willingness to attempt to reach agreement, Norfolk Gliding Club and Priory Farm Airfield repeatedly offered you the opportunity to provide the withheld documents and meet at Tibenham to jointly develop the SoCGs. But you declined to take up those offers.

Whilst collecting information to form part of our Written Representation we carried out an extensive review of much of the advice and guidance that has been published by the Department

of Transport, the NPPF, the NPS EN-1, the CAA, the BGA, the GAAC and others. In addition, we commissioned an independent study of the Airfield Impact Assessment and associated safety issues by Dr Mark Eddowes of Eddowes Aviation and considered a second existing study on safeguarding unlicensed aerodromes authored by Stratten CSL

Our conclusion from the review of all this information from multiple sources is that the safety concerns expressed by both our airfields are valid and contrary to those expressed by your aviation consultants, ASA.

In view of this we consider the correct way forward is for National Grid to provide the withheld documents and as the 'agent of change', recommend mitigation on their part by either realigning the route to outside our 5km safeguarding zone or undergrounding for the 11km through the zone

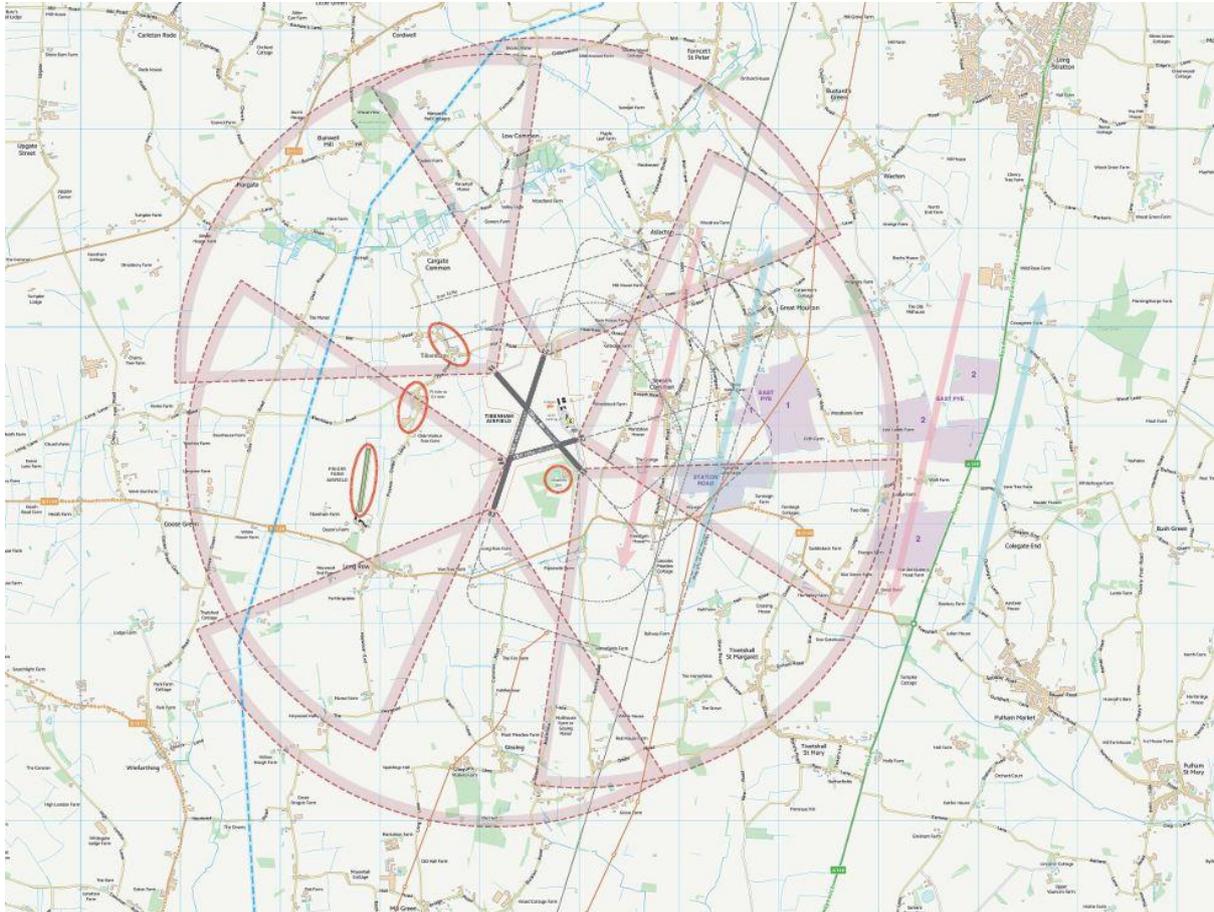
If National Grid is able to provide these documents we would be willing to meet promptly (Tibenham remains available as a venue) to progress the SoCGs on a practical basis

If National Grid is not able to provide these documents, then neither airfield can see any possibility of signing an SoCG that does not include mitigation either by moving or burying the proposed line and we would expect the SoCGs to remain not agreed

Kind Regards  
Tony Griffiths  
Safeguarding Officer  
Norfolk Gliding Club

## Appendix D

### Tibenham airfield overlaid with EFATO splays Splay extends 3km from the end of the runway



#### Note

Tibenham airfield is shown in dark grey in the centre of the picture

To the left the three ellipses identify the locations of Priory Farm Airfield and two villages

Further left again is a blue line representing the proposed alignment of the pylons

Under normal circumstances the emergency landing area (splay) from an EFATO type incident is described as  $30^{\circ}$  either side of the extended centreline for 3km from the end of the runway

However, where an airfield is being used for flight training such as Tibenham, CAP 793 advises that a greater allowance should be made. This map demonstrates the area covered by a  $50^{\circ}$  splay extending 3km from the end of the runway