



# Norfolk Gliding Club Ltd

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**Norwich to Tilbury EN020027**

**IP Reference Number** [REDACTED]

## **Statement of Common Ground – Part 1**

In the absence of an agreed Statement of Common Ground (SoCG) and the apparent reluctance of National Grid (NG) to meet with Norfolk Gliding Club (NGC) as advised in previous submissions this version has been prepared by NGC as the stakeholder

NGC would like to express its thanks to the Planning Inspectors of the Examining Authority at the Open Floor Hearing on Thursday February 12<sup>th</sup> 2025 who provided advice and guidance on the procedural aspects of this matter

The document is based on the original draft as sent to NGC by NG in July 2025 together with many of the additions made by NG from then to December 2025. To this base NGC have added their own comments in addition to responding to some of the NG statements which are shown in red

The links to Design and Development Reports in section 4, engagement, are those supplied by NG and do not infer any agreement by NGC as to their content

Prepared by

[REDACTED]

Safeguarding Officer  
Norfolk Gliding Club

**Norwich to Tilbury Project**  
**Statement of Common Ground with**  
**Norfolk Gliding Club Ltd – Tibenham Aerodrome**

**1 Introduction**

1.1 This Statement of Common Ground (SoCG) has been prepared to outline those areas of common ground between National Grid (NG) and Norfolk Gliding Club (NGC), owners and operators of Tibenham aerodrome regarding the aviation safety impacts in relation to the proposed Norwich to Tilbury Project. (“the Proposed Development”)

1.2 It is being submitted to the Examining Authority (ExA) as NGC’s view of the current issues in respect of the Proposed Development with the aim of providing ExA with a clarification as to the understanding of any issues and facilitate an efficient resolution process.

1.3 This SoCG sets out wherever possible both the matters of agreement between NG and NGC and those matters where agreement has not been achieved

1.4 This document has not been submitted to NG for comment or agreement

**2 The Project**

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

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

**3 Respective Interests**

3.1 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, Section 5.5 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.

3.2 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.

3.3 NG recognises that EN-1 which states

*'It is essential that the safety of UK aerodromes, aircraft and airspace is NOT adversely affected by new energy infrastructure'*

places a requirement on them as the Applicant to consult with any aerodrome likely to be affected by the proposed development in preparing an assessment of the proposal on aviation interests.

3.4 Tibenham aerodrome was identified after the initial route alignment had been developed, with its runway being located only 1,700m west of the Project's proposed overhead line alignment and recognising the potential for the proximity of the infrastructure to impact aviation safety and aerodrome operations.

3.5 In accordance therefore with EN-1, the operator of Tibenham aerodrome NGC was identified as a priority stakeholder for engagement in relation to these aviation impact considerations.

3.6 There was no collaboration or consultation with NGC prior to the design and development of the initial route alignment

#### **4 National Grid's consultation approach, and engagement with Norfolk Gliding Club to date**

4.1 - 2022

National Grid published information on how the project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within the Corridor and Preliminary Routeing and Siting Study Report (April 2022)

4.1.1 April 21 – June 16 2022 National Grid held non-statutory presentations to the general public at various village halls and the like on the preferred route corridor which had been developed without reference to any of the aerodromes and there was no attempt to contact NGC or other airfields that would be affected by the project

4.2 - 2023

Development of the 2023 Preferred Draft Alignment, responding to feedback and other studies, as described within the [Design Development Report \(June 2023\)](#)

4.2.1 June 27 – August 21 2023 National Grid held non-statutory consultations on the 2023 Preferred Draft Alignment

4.2.2 July 24 2023 National Grid held the first consultation with Norfolk Gliding Club at Tibenham aerodrome involving Alan Stratford and Associates

(ASA), Chair of the Norfolk Gliding Club (the Operator) and fellow committee members, together with representatives from the Civil Aviation Authority Airfield Advisory Team (CAA AAT) and neighbouring Priory Farm aerodrome.

#### 4.2.3 Matters raised included:

- A presentation by NGC of the development and extent of their safeguarding zone as approved by the CAA
- Concern expressed by NGC over the proximity of the preferred route which would pass through their 5km safeguarding zone and was developed without collaboration or consultation with NGC contrary to planning guidelines
- Concern expressed by NGC regarding the aviation safety issues that would result from the proposed development which were identified as aerotow take offs from runway 26, all approaches to land on runway 08 and the effective removal of the emergency landing area to the west of runways 26 and 33
- Potential loss of income since the British Gliding Association (BGA) have stated that if the pylon route is not changed, they would not allow Tibenham to remain a viable National Competition site due to safety issues.
- Potential safety risk from circuit pattern changes made by aircraft using Priory Farm airfield
- Concerns expressed by NGC over the effect that the proposed route would have on electronic communication and conspicuity systems: Radio communication range, FLARM, ADSB, Transponders – NG agreed to investigate and report back
- Concerns expressed by both NGC and Priory Farm over the lack of accurate information – NG promised to supply a detailed map of the route and a list of all the airfields affected by the route. Note – The map did not arrive until July 2025 and the list of affected airfields has never been supplied

#### 4.3 - 2024

Development of the 2024 Preferred Draft Alignment, considering feedback and other studies, as described within the [Design Development Report \(June 2024\)](#)

4.3.1 April 10 - July 26 National Grid held statutory consultations on the 2024 Preferred Draft Alignment

4.3.2 May 1 National Grid (with ASA) held a statutory consultation with NGC as the operator but limited their attendees to 3

#### 4.3.3 Matters raised included

- Disbelief expressed by NGC that none of the NG attendees had knowledge of the previous consultation nor answers to any of the queries raised at that meeting

- A re-presentation by NGC of the development and extent of their safeguarding zone as approved by the CAA at the end of 2022
- A confirmation of the concern expressed by NGC regarding the aviation safety issues that would result from the proposed development which were identified as aerotow take offs from runway 26, all approaches to land on runway 08 and the effective removal of the emergency landing area to the west of runways 26 and 33
- A confirmation of the potential loss of income since the British Gliding Association (BGA) have stated that if the pylon route is not changed, they would not allow Tibenham to remain a viable National Competition site due to safety issues
- Discussion of potential mitigation, ranging from offshoring, undergrounding or relocating outside the 5km safeguarded zone or 3.5km west of the nearest runway end
- Discussion of potential mitigation involving the alteration of the design to incorporate low height pylons to which NGC commented that low height pylons do not solve the need for emergency landings in the event of power/climb rate reductions during take-off

4.3.4 July 20 Written representation received from NGC objecting to the Project, matters identified included

- That the proposals are contrary to government, Civil Aviation Authority (CAA) and planning guidelines as well as the Air Navigation Order 2016
- That National Grid's appointed aviation consultants failed to fully understand gliding operations despite the consultation of the previous year
- That the CAA state that only the aerodrome operator can hold expert opinion on safety at their airfield with respect to potential obstacles
- Concerns regarding adverse impacts on the safety of operations, the consequential impacts on aerodrome status as a Community Amateur Sports Club (CASC) and National Significant Area for Sport (SASP) and the longer-term financial viability

4.4 - 2025

Development of the proposed Project Alignment by NG prior to DCO submission, considering feedback and other studies.

4.4.1 National Grid publicised their plan to hold a series of on-line "Targeted Consultations" inviting interested stakeholders and members of the public to register

4.4.2 The targeted consultation was attended by NGC but it turned out to be a glorified presentation of how they had responded to the consultations with

no involvement by the attendees. NG did acknowledge that the proximity of Tibenham and Priory Farm to the proposed route was a problem that needed to be addressed by a meeting with the stakeholders

4.4.3 February 12 Email from NGC to NG regarding the targeted consultations in the Norwich area and NG's acknowledgement that a meeting was required requesting a date for the meeting to discuss the aviation safety impacts - was not responded to by NG

4.4.4 April 29 Invitation from NG's appointed consultant (LSTC) to take part in a further consultation

4.4.5 May 2 Email from NGC requesting clarification of the purpose of meeting given no reaction to the issues raised in 2024

4.4.6 May to August 5 Various emails between LSTC and NGC in relation to meeting arrangements and the draft versions of the SoCG and Aerodrome Impact Assessment Summary

4.4.7 May to August 5 Draft SoCG and Aerodrome Impact Assessment Summary returned to LSTC annotated with comments, errors, queries and omissions

4.4.8 August 5 Email from LSTC confirming their acceptance of the proposed meeting agenda which would include written statements of the route development rationale (why the expertise of the CAA, BGA, GAAC and NGC was ignored in favour of the opinion of ASA), NG's mitigation proposals (since we cannot move the airfield and the proximity represents a risk to life in an emergency) and the detail cost information (of the various options around Tibenham relative to the overall project cost)

4.4.9 August 7 meeting in-person between NG (with ASA) and representatives of Tibenham and Priory Farm aerodromes. Matters discussed included

- NG advised that despite their previous emails they never had any intention of providing the written statements as agreed prior to the meeting
- A brief discussion on the route development rationale but no explanation of why the expert advice and guidance from the CAA, BGA, GAAC and NGC was ignored in favour of the opinion from ASA
- A claim by ASA that the risk of a fatal accident was small and did not justify mitigation on behalf of NG though no evidence could be produced to substantiate that claim
- A discussion of aviation safety risk assessments, including consideration of Engine Failure After Take Off (EFATO), but no acceptance by ASA that this increased the fatal accident risk in this scenario

- A brief discussion of high-level transmission technologies and general cost comparisons, including with reference to the NGC proposed aviation impact mitigation options
- In accordance with the agreed agenda, as NG had failed to provide a satisfactory response to the first three items, the meeting was adjourned to allow them to reconsider

4.4.10 October 23 Email to LSTC with regard to the missing documents advising that

- Their claim that LSTC/NG/ASA did not agree to provide the documents was incorrect
- Kevin Lussi's (LSTC) email of July 29 advised that the full agenda had been agreed which included the presentation of the documents
- Louise Brace's (LSTC) email of August 5 also stated "pleased that Kevin was able to confirm our acceptance of your proposed agenda"

4.4.11 October 27 Email from NGC to LSTC with regard to the Aerodrome Assessment Summary referring to

- AAS received last week seems to be identical to the one sent to LSTC at the beginning of July with no attempt at addressing the comments
- Requesting answers to specific questions relating to the queries and comments previously raised

4.4.12 Engagement next steps

- LSTC to produce the agreed minutes of the August meeting
- LSTC to coordinate with ASA and NGC to produce an agreed version of the Aerodrome Impact Assessment (AIA)
- LSTC to coordinate with NGC to produce an agreed version of the SoCG

4.5 - 2026

No meaningful engagement with NG, LSTC or ASA to resolve the outstanding matters

4.5.1 January 26 Email from LSTC confirming they were the 'principal point of contact representing the National Grid Project in engagement with yourselves' despite previous emails advising that our queries were being reverted to NG. No response was ever received from NG

4.5.2 February 6 Email from LSTC advising of the content of the ExA rule 6 letter and the need to agree the SoCG by February 26<sup>th</sup> but no response to the emails from NGC since the August 2025 consultation in which repeated offers were made to host an in person meeting in order that the SoCG, the AIA and the minutes of that meeting could be agreed

4.5.3 April 16 Email reply to the LSTC request for a meeting to resolve the outstanding issues within the SoCG concluded with

*Without National Grid's input with respect to items 1 - 3 above, which might explain why so little credence is given by them to aviation safety, we see little to be gained in a meeting that has no agenda and just confirms the status quo*

There has been no further communication from either LSTC or NG since then.

## Norwich to Tilbury EN020027

IP Reference Number [REDACTED]

### Statement of Common Ground – Part 2

1. Matters Agreed

Issue	Agreement reached	Date agreed	Relevant documentation
All	No		

2. Matters currently under discussion

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
Legislative, Regulatory, Policy and Guidance Context	<p>The proposal is contrary to government policy on airfield safeguarding and aviation safety.</p> <p>The proposal is contrary to the Civil Aviation Authority's (CAA) policy and guidelines on aerodrome safeguarding and aviation safety.</p> <p>The proposal is contrary to the current planning guidelines as shown in the National Planning Policy Framework (NPPF) and the National Policy Statements where Nationally Significant Infrastructure Projects (NSIP) are in conflict with aviation safety.</p> <p>The proposal is contrary to the Air Navigation Order 2016 which is a statutory instrument.</p> <p>(July 2023, repeated July 2024 and 2025)</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(1) and EN-5, which has involved consulting with and considering the feedback (2) of Tibenham aerodrome as an aerodrome (3) likely to be affected by the Project, as well as relevant aviation stakeholders including the (4) CAA AAT and the British Gliding Association, in preparing and informing impact assessments. Furthermore, the proposal has been designed, where possible, to minimise</p>	<p><a href="#">DfT/OPDM circular 1/2003</a></p> <p><a href="#">CAP 168 Licensing of Aerodromes, January 2022</a></p> <p><a href="#">CAP 738 Safeguarding of Aerodromes, October 2020</a></p> <p><a href="#">CAP 793 Safe Operating Practices at Unlicensed Aerodromes, July 2010;</a></p> <p><a href="#">NPS EN-1 Overarching National Policy Statement for Energy, November 2023</a></p>

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p>1 – EN1 paragraph 5.5.5 is quite specific stating that UK airspace is important and it is essential that the safety of UK aerodromes, aircraft and airspace is NOT adversely affected by new energy infrastructure.</p> <p>There was no collaboration prior to the route development and no meaningful consultation with NGC since and subsequent discussions were always based on the presumption that mitigation had to come from NGC, not National Grid</p> <p>Even NG’s consultants agree that there will be an increased risk to aviation safety with this proposal</p> <p>In ‘<i>considering the feedback</i>’ there has been no change to the scheme and no collaboration. NG has not suggested any means of addressing the acknowledged safety risks or possible mitigation on their part</p> <p>2- At the statutory consultation stage NG representatives claimed to be totally unaware of any feedback from the previous non-statutory consultation. There is no evidence of ‘collaboration’.</p> <p>The initial report published by NG made reference to one aerodrome – Stow Maries for its historical value – not its current activity. No other aerodrome was referred to – so there has never been ‘collaboration’ and if, at an early stage, NG had engaged with</p>	<p>adverse impacts on the operation and safety of aerodromes (5)</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, we have ensured our approach appropriately considers aerodrome licensing and safeguarding requirements and parameters, including as described within CAP 168 (Licensing of Aerodromes), CAP 738 (Safeguarding of Aerodromes) (6) and CAP 793 (Safe Operating Practices at Unlicensed 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>It is recognised that the Air Navigation Order (ANO) 2016 (7) forms the legal basis for almost all areas of civil and general aviation that are regulated at national levels. It is not considered that the Project would breach this order.</p> <p>(March 2025)</p>	<p><a href="#">EN-5 Electricity Networks National Policy Statement, March 2023</a></p> <p><a href="#">National Planning Policy Framework, last updated February 2025</a></p> <p><a href="#">The Air Navigation Order 2016</a></p>

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p>Tibenham, minor route changes could have removed or significantly reduced the threat to aviation safety.</p> <p>3 - There is no “likely” to be affected – Tibenham will be adversely affected both in safety terms and financial loss and the potential loss of a valuable sport, recreation and amenity asset.</p> <p>4 - NG has completely ignored the CAA AAT input (which provides qualified, expert advice) in favour of the less expert and less independent ASA input refuse to provide any explanation of why</p> <p>5 – NGC <b>totally refutes</b> the assertion that the scheme was designed to minimise adverse impacts on aviation safety.</p> <p>The original route published in 2022 was designed without reference to the proximity of airfields There was nothing in the NG project documents at that time that mentioned aviation, let alone aviation safety.</p> <p>Since then, NG having been playing catch up trying to justify their initial failings by trying to persuade airfields to compromise their safety standards to help dig themselves out of the hole they have got into</p> <p>In addition, the CAA states in CAP 738 regulation 2018/1139 that only the aerodrome operator (NGC) is the authority to determine safety with respect to proposed obstacles near the aerodrome.</p>	<p>As referenced within Section 4 of the draft SoCG, National Grid recognises and agrees with the importance of collaboration as described within para, 5.5.5 of EN-1, noting this is qualified by the requirement to balance potential adverse impacts on aviation with the urgent need for nationally significant new energy infrastructure. (8)</p> <p>Further to National Grid’s recognition of aerodrome operator responsibilities for safeguarding as per para. 5.5.16 of EN-1, National Grid recognises its responsibilities as an applicant to consult the aerodrome to inform its own assessment of aviation impacts. (9)</p> <p>National Grid notes that CAP 738 provides detailed guidance on matters including operator accountability for safeguarding, procedures for ensuring involvement in the planning consultation process, and the assessment of OLS infringement and other impacts. We would be grateful for clarification of which aspect of the guidance is considered to have been ignored. (10)</p>	

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p data-bbox="504 268 1048 389">Furthermore, operator accountability does not mean the operator must accept new third-party hazards or carry the burden of mitigating them</p> <p data-bbox="504 424 1021 539">6 – If as NG claims it considered the safeguarding requirements and parameters within CAP 738, why did it choose to ignore them.</p> <p data-bbox="504 574 992 695">There is no evidence to support their appraisal or assessment in any NG documents nor has any been provided to NGC, just rhetoric</p> <p data-bbox="504 730 1039 880">7 - If as stated, NG recognises that the ANO forms the legal basis for almost all areas of civil and general aviation why did ASA say at the statutory consultation in 2024 that this should be ignored?</p> <p data-bbox="504 916 1030 970">Where is the evidence on which NG relies in order to make this assertion?</p> <p data-bbox="504 1005 1010 1094">Furthermore NGC, as the expert on its site and operations, believes the Project would breach this order</p> <p data-bbox="504 1129 1043 1369">8 – Further false claims with regard to collaboration. Despite the limited consultation and emails, NG continue to fail to recognise that the potential adverse impact on aviation will be one or <b>more fatalities</b> and mitigation on their part (say undergrounding) will have no effect on the overall timescale of the project</p>		

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p>9 – But NG failed to engage with NGC and other airfields prior to publishing the pylon route in 2022</p> <p>10 – Since the first non-statutory consultation of 2023 NGC have provided clarification of those aspects of the guidance that have been ignored. In agreeing to the agenda for the August 2025 consultation NG confirmed they would document those aspects and show why they have ignored them. As at May 2026 we are still waiting for that agreed statement</p> <p>(June 2025 following receipt of this draft SoCG).</p>		
Consultation to Date	<p>NGC considers it should have been formally and specially engaged during the 2022 non-statutory consultation, prior to NG's development of the 2023 Preferred Draft Alignment, to avoid issues in relation to aviation impacts currently being discussed.</p> <p>NGC states that information sharing, including provision of route mapping and a list of other aerodromes potentially impacted by the Project has not been completed. The map was eventually received in July 2025 but the list of airfields is still outstanding</p> <p>(August 2025)</p> <p>1 – In an email the CAA AAT advised NG that the Impact Assessment methodology</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). (1)</p> <p>It recognises that, as for Tibenham 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 received and consideration of effects on Tibenham aerodrome. (2)</p>	

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p>was flawed and should not be used – why continue to ignore that advice and guidance?</p> <p>2 - NGC has repeatedly asked why expert advice and guidance from aviation organisations such as the CAA, the GAAC, the BGA and others has been ignored in favour of the opinion of the consultants employed by NG.</p> <p>No evidence has been submitted to support this approach in any documentation, just comments in the form 'has been taken into consideration' yet the consequences of this failure to adequately address aviation safety are likely to be one or more fatalities.</p> <p>3 – Details of the alignments and mapping was not provided until July 2025 along with the verbal comment in the August 2025 consultation that no route changes would be considered and NGC must make operational changes in the interests of aviation safety</p>	<p>Route mapping and a list of potentially impacted aerodromes was shared with the CAA AAT as the agreed central repository for Project information for operators, and was used to inform their cross-project consideration of potential aerodrome impacts. Details of the Project alignments (including mapping) was provided at the various consultation stages. (3)</p> <p>(August 2025)</p>	
<p>Aviation Impact Assessment Methodology and Key Assumptions</p>	<p>Failure to appropriately consider the nature and complexity of operational aspects of a gliding site within aviation impact assessments.</p> <p>(July 2024)</p> <p>According to an email from NG dated 31/1/25, 'The Civil Aviation Authority (CAA) has not directly advised the Norwich to Tilbury Project in relation to the aviation</p>	<p>National Grid's Aviation Impact Assessment methodology (1) has been developed to enable site-specific impact assessments for aerodromes potentially impacted by the Project. (2) 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</p>	<p>CAA AAT 2024 Statutory Consultation Feedback and 2025 Position Statement to be linked</p> <p>In an email from LSTC on behalf of NG, they state that there was no consultation with the CAA AAT</p>

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p><i>impact assessment methodology used. Paras 15.3.23 and 15.3.27 of the ES Appendix describe, however, how the methodology responds to the CAA’s extant guidance including consideration of Obstacle Limitation Surfaces (OLS) infringement for obstacle assessment and treatment purposes, recognising OLS definition relates to manoeuvrability from obstructions’ yet under the column ‘Relevant Documentation’ they state otherwise</i></p> <p>As at June 2025, NGC are not aware of having received a document headed “Aviation Impact Assessment” and therefore find it difficult to understand how we may have responded in July 2024 as shown above by NG</p> <p>1 – This sounds very good but the reality is that none of it appears to have been put into practice following the 2023 and 2024 consultations in developing the route as we understand it</p> <p>2 – As far as NGC are aware there has been no realistic evaluation of take-off, landing or forced landing risks despite all the research data provided in 2024, just some text book values which bear little resemblance to reality</p> <p>3 – From what we have seen only text book information has been used contrary to the CAA recommendation – all the consultation information we provided in 2023 and 2024 has been ignored</p>	<p>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 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,(3) as well as via consultation with operators and relevant aviation stakeholders); and the surrounding context in terms of topography, existing obstacles (including other overhead lines) and neighbouring aerodromes.(4)</p> <p>(5) 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 standard for obstacle assessment and treatment, albeit not a regulatory requirement for unlicensed aerodromes. (6) If CAP168 standards are met, the proposed overhead line alignment is considered to have an acceptable impact (7) on the aerodrome’s operations and no further changes are considered likely to be necessary.</p> <p>With regards to gliding-specific considerations, feedback from the Operator and the British Gliding Association (BGA) has</p>	

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p>4 – Which neighbouring aerodromes? We are still waiting (as at May 2026) for the list of aerodromes promised by NG in 2023</p> <p>5 – Even the CAA do not consider the OLS approach to be a best practice standard.</p> <p>When we contacted them in 2022 whilst developing our own safeguarding plan, they advised that the OLS approach was a one size fits all starting point and was not suitable for Tibenham hence the use of the concentric circle method.</p> <p>In the consultations of 2023 and 2024 we advised NG of this so why do they revert to the OLS approach contrary to the expert advice from the CAA?</p> <p>6 – Since the experts from the CAA tell us that the CAP 168 OLS standards are not applicable, meeting them or not is irrelevant so why is NG applying them? We would also question the claim that they are being met</p> <p>7 – ASA advised in the 2024 consultation that in their opinion there would be an increased safety risk which means probable collision with the OHL. Why do NG consider this to be acceptable? <b>We do not consider any increased safety risk acceptable</b></p> <p>8 – In short NG have decided to ignore the feedback from NGC and BGA. This paragraph does nothing to explain why the expert opinion of both has been ignored</p>	<p>been considered, as well as account taken of current BGA guidance, including in relation to competition requirements. BGA engagement has also focused on the need for guidance on an objective or standardised means of assessing potential gliding impacts in relation to obstacles (especially during take-off and approaches, and for competitions). (8)</p> <p>(May 2025)</p> <p>National Grid considers its methodology to be aligned with the multifaceted approach described by the CAA AAT in relation to its own assessment in its July 2024 response to the Statutory Consultation and its Position Statement of March 2025. Furthermore, consideration of OLS infringement is suggested to accord with EN-1 and extant CAP 168 and CAP 738 guidance.(9)</p> <p>(August 2025)</p> <p>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 relation to Tibenham 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.</p> <p>(September 2025)</p>	

Issue	NGC position (including date)	National Grid response (including date)	Relevant documentation
	<p data-bbox="506 237 1048 328">NGC raised concerns that details of impact assessments have not been shared with the operator or published.</p> <p data-bbox="506 363 1048 512">9 – This does not agree with the NG email (quoted earlier) indicating that there has been no consultation with the CAA AAT who had previously advised that this approach was not appropriate</p> <p data-bbox="506 547 674 576">(August 2025)</p>		
Impact Assessment Conclusions	<p data-bbox="506 580 1048 855">The proposal will adversely impact the safety of aviation operations as a result of the presence of pylons endangering aircraft using the east/west runway. Specific concerns relate to forced landing risks and cable contact occurrences, aborted aerotow launches and aerotow launches with reduced climb rate, and cross country gliders returning from the west.</p> <p data-bbox="506 890 640 919">(July 2024)</p> <p data-bbox="506 954 1014 1007">1 – CAP 168 used again which the CAA experts say is not appropriate at Tibenham</p> <p data-bbox="506 1042 1048 1190">2 – Recent test flights have shown that an aerotow with a two seat glider sometimes has difficulty reaching 200ft by the time it crosses the proposed OHL route so current circuits cannot continue to be used</p> <p data-bbox="506 1225 1048 1374">3 – The BGA have already advised NGC that if changes to the route are not made the Tibenham would not be allowed to hold national gliding competitions with the subsequent loss in income</p>	<p data-bbox="1070 580 1608 1038">National Grid's Aviation Impact Assessment conclusions for Tibenham aerodrome include that, whilst the Project will represent a new obstacle in the vicinity, CAP168 OLS (1) standards are met, with the exception of a minor penetration of the Inner Horizontal Surface (IHS). Overhead line overflight clearance margins for straight ahead take-offs (including for aerotows) and glider or powered aircraft approaches are assessed as adequate (2). It is assessed that current circuits can continue to be used. It is anticipated that further consultation with the operator and the BGA will clarify implications for competition finishes. (3)</p> <p data-bbox="1070 1074 1211 1102">(May 2025)</p> <p data-bbox="1070 1137 1608 1374">In addition to the Operator concerns, National Grid recognises that the CAA AAT has advised that the presence of the Project alignment could impact pilot decision making and outcomes, including in emergency scenarios, potentially impacting operations related to runway 08/26. Their March 2025 Position Statement advises that aircraft</p>	<p data-bbox="1635 580 1928 639">Aerodrome Assessment Summary; Drawings</p> <p data-bbox="1635 675 2022 855">These drawings show a splay of only around +/- 5° ASA are fully aware that at a training airfield the EFATO splay should be 30° for 3km from the airfield</p>

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	<p>4 – I am not aware of any response by the BGA to the targeted consultation of February 2025 since they were not involved.</p> <p>They did respond in November 2025 to express concerns about the lack of open and meaningful consultation with particular reference to reduced aerotow climb rates and EFATO incidents both of which ASA have continued to ignore and could result in fatalities</p> <p>5 – Risk acceptability is not determined by an operator supplying a preferred clearance value. The hazard arises from emergency and abnormal scenarios where clearance is not controllable. Design-led mitigation is therefore required of NG</p> <p>In the absence of the withheld documents, there has been no meaningful engagement since the August 2025 meeting</p>	<p>performance in relation to take-off clearances is variable based on multiple factors. Furthermore, we are aware of BGA concerns in relation to departures from runway 26 as raised within their March 2025 response to the targeted consultation (4), and their associated intention to seek expert opinion to quantify this risk. We would be grateful for Operator clarification of what would be an acceptable clearance, including for gliding and towing aircraft and noting your comments regarding recent test flights, to enable objective assessment. (5)</p> <p>The CAA AAT's July 2024 response to the Statutory Consultation stated that the proposed infrastructure would force gliders returning from the west to remain sufficiently high to clear the overhead line, impacting competition flying. The BGA's March 2025 response stated the presence of the alignment would present a real and perceived risk to glider pilots during competitions, which was stated may prevent competitions being held or reduce the number of competitors. We would be grateful for Operator clarification of acceptable clearances in relation to competition finishes.</p> <p>(August 2025)</p>	
Mitigation Measures	<p>NGC position - The only effective mitigation for the aviation safety issues identified during the limited consultation we had involved design-led changes to remove the hazzard</p> <p>Had National Grid proposed:</p>	<p>NG position – No design change or procedural changes</p> <p>EN-5 makes clear that the Government considers overhead lines to be the strong starting presumption for electricity network</p>	

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	<ul style="list-style-type: none"> <li>- An offshore solution;</li> <li>- An underground solution whilst the Project crossed the NGC 5km safeguarding area;</li> <li>- An overground solution outside the safeguarding area;</li> </ul> <p>There would be no cause to object.</p> <p>(July 2024)</p> <p>1 – EN-5 may well imply overhead lines to be the strong starting presumption but EN-1 states that it should not be at the expense of aviation safety</p> <p>2 - NG chose to withhold the detailed costs from our August 2025 consultation but the NESO report (previously submitted) identifies undergrounding as a lower cost alternative.</p> <p>Why would NG not discuss these costs with us as agreed unless they have something to hide?</p> <p>3 – We do <b>not</b> consider the potential of a fatal accident resulting from a collision with the overhead line to be a minimal adverse impact</p> <p>Furthermore, expert opinion on the adverse impacts of the proposed route is held by NGC, BGA and CAA who disagree totally with the NG conclusions</p> <p>4 – Incorrectly addressed as per the CAA AAT's email to NG</p>	<p>development. (1) 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. (2)</p> <p>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. (3)</p> <p>The operator's defined safeguarding area has been noted, albeit recognising its primary purpose is to ensure aerodrome consultation regarding potential impacts by prospective developers, already in train in the instance of the Project and addressed via the Impact Assessment. (4)</p> <p>The operator may consider operational procedure changes, including to enhance pilot awareness of the overhead line as an obstacle, especially in relation to climb and descent progress. (5)</p> <p>In relation to gliding competition finishes, it is suggested that an acceptable finish could be designed by the operator, taking account of the Project alignment and subject to clarification of BGA guidelines. (6)</p> <p>(May 2025)</p>	

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	<p>5 – Awareness of the overhead lines will do nothing to protect the pilot from a fatal collision with them in the event of an EFATO type incident</p> <p>Past experience has shown that the outcome of any collision by a light aircraft with overhead lines is likely to be fatal</p> <p>In addition, it is the operator of the airfield to whom the CAA delegates that expert opinion when deciding on the safety or otherwise of obstacles near the aerodrome, not NG</p> <p>That operator accountability does not mean the operator must accept new third-party hazards or carry the burden of mitigating them</p> <p>Norfolk Gliding Club believe the proposed pylon route to be a significant aviation safety risk in respect of aerotow take-offs from both runways 26 and 33 under normal circumstances and a very significant risk in the event of any power reduction during the early stages of the flight</p> <p>6 – Suggested by whom? Irrelevant in any case since the BGA have already made it public that construction of the proposed pylons means a ban on national competitions at Tibenham</p>	<p>National Grid is keen to support operator consideration of mitigations, such as changes to operational procedures, as well as subsequent implementation of agreed mitigations, as appropriate.</p> <p>(August 2025)</p>	
Other Impacts of the Project	The proposal will adversely impact Norfolk Gliding Club's ability to continue as a Community Amateur Sports Club (CASC) and as a national Significant Area for Sport	In view of the current assessment conclusions, no effects are anticipated for Norfolk Gliding Club in terms of its business or status. (1)	

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	<p>(SASP), together with our overall financial viability (July 2024)</p> <p>1 – The assessment made by ASA on behalf of NG has been shown to be flawed by a number of professional aviation experts including the CAA AAT, the BGA and Eddowes Aviation. (2024, 2025)</p> <p>The BGA have already stated that there will be a financial impact yet this continues to be ignored</p>	<p>(May 2025)</p>	