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Norwich to Tilbury

Volume 8: Examination Documents

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

Final Issue B

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nationalgrid

Revision History

<u>Version</u>	<u>Date</u>	<u>Submitted at</u>
<u>A</u>	<u>26 February 2026</u>	<u>Deadline 1</u>
<u>B</u>	<u>12 May 2026</u>	<u>Deadline 4</u>

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. Summary of matters under discussion

As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>7.1</u>	<u>The Stakeholder and the Applicant agree the importance of accordance with relevant legislation, national policy and aviation-specific guidance, but differ in interpretation of Applicant requirements and responsibilities in relation to impact assessment, operator consultation and impact mitigation.</u>	<u>Not agreed: jointly considered unlikely to resolve bilaterally. For the Examining Authority to assess.</u>
<u>7.2</u>	<u>The Stakeholder position is that the proximity of General Aviation aerodromes and associated safety impacts was not appropriately considered during the early stages of the Project's design development. The Applicant position is that its approach, considering multiple aviation impact variables on a site-specific basis throughout the</u>	<u>Not agreed – jointly considered unlikely to resolve bilaterally. For the Examining Authority to assess.</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>development of the design, and not to apply a generic separation distance as an initial design constraint, was reasonable and appropriate.</u>	
<u>7.3</u>	<u>The Stakeholder position is that the Applicant's engagement and consultation throughout development of the Project design was inadequate, including in relation to the position of the overhead line, and particularly with regards to the re-location of the Cable Sealing End (CSE) compound in close proximity to the aerodrome. The Applicant position is that consultation undertaken was fully compliant with legislative requirements and the Statement of Community Consultation. The parties differ in their interpretation of consultation requirements with regards to the need for risk-based justification for design changes to be implemented in response to stakeholder feedback.</u>	<u>Not agreed – jointly considered unlikely to resolve bilaterally. For the Examining Authority to assess.</u>
<u>7.4</u>	<u>Following agreement of the principle of safeguarding (see Matter 6.4), the Stakeholder position is that the Applicant has not engaged the Operator and its undertaking of the impact assessment is inappropriate. The Applicant position is that its impact assessment responsibilities in accordance with EN-1 are distinct from but inform operator safeguarding and risk management.</u>	<u>Not agreed – jointly considered unlikely to resolve bilaterally. For the Examining Authority to assess.</u>
<u>7.5</u>	<u>The Stakeholder and the Applicant agree the principles that assessment of aviation impacts on both licensed and unlicensed aerodromes should be considered according to equal parameters, and that the nature of aerodrome-specific flight operations should be specifically considered within the assessment methodology. The Stakeholder does not agree to ASA's undertaking of the assessment on behalf of the Applicant (see also Matter 7.4), nor accept the impact assessment conclusions or Project design (as addressed by 7.6)</u>	<u>Principles agreed – Stakeholder does not agree to the separation of this matter from 7.4. and 7.6. Unlikely to resolve further.</u>
<u>7.6</u>	<u>The Stakeholder objects to the proposed Project alignment on aviation safety grounds and associated limitations to future aerodrome uses, predominantly in relation to the CSE compound</u>	<u>Not agreed – jointly considered unlikely to resolve bilaterally. For the Examining</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>location and, the OHL alignment. The Applicant assesses aerodrome operations can continue safely and has sought clarity on operator risk acceptability in relation to partial Obstacle Limitation Surface (OLS) infringement as well as its commitments in terms of future operational proposals. The Stakeholder does not agree the risk acceptability.</u>	<u>Authority to assess.</u>
<u>7.7</u>	<u>The Stakeholder position is that the Applicant has not t at any point aproperly engaged with the Operator to develop mitigation measures. The Applicant position is that further substantive changes to the Project design are not justified by the assessed aviation impacts but has sought engagement regarding reasonable mitigation measures to address residual impacts associated with the Project's construction and operation.</u>	<u>Jointly recognise opportunity to progress discussion of mitigation of construction impacts during examination period, including to inform Operator position in relation to its future operations</u>

4. ~~3.~~ Background

4.1 ~~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.

5. ~~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. 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.

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. [These were provided to the Applicant in its letter of 16th May 2022 and later during a site visit 25 July 2023.](#)
- 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 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]**
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
 - 25 April meeting between National Grid (with ASA) and the operator. Matters raised included:
 - Discussion of the aerodrome safeguarding plan defining a 4000m outer perimeter
 - 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.
- 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~~[Operator](#)
- 18 March email response sent from ~~Project Team to operator~~[National Grid](#) to ~~Operator~~[Operator](#) feedback received during the Targeted Consultation
- 25 March written response to ~~Project Team~~[National Grid](#) email of 18 March received from the ~~operator~~[Operator](#)
- 4 April email from ~~Project Team~~[National Grid](#) proposing meeting to discuss ~~operator~~[Operator](#) feedback
- 7 April ~~operator~~[Operator](#) email response stating inadequacy of consultation to date and accepting meeting proposal
- 16 April email from ~~Project Team~~[National Grid](#) proposing development of Statement of Common Ground / Stakeholder Agreement
- 16 April email response stating need for ~~operator~~[Operator](#) endorsement, and requesting copy of provision of written aviation advice provided to National Grid
- 25 April email from ~~Project Team~~[National Grid](#) providing draft Stakeholder Agreement and draft technical drawings
- 28 April email from ~~Project Team~~[National Grid](#) 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~~[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 National Grid](#) 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 National Grid](#) with amended version (V.04) of Stakeholder Agreement, referring to 2022 stakeholder engagement
 - 28 May [operator 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 National Grid](#) providing requested link to **Planning Inspectorate Scoping Opinion (December 2022)**
 - 9 June email response from [Project Team National Grid](#) 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 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 National Grid](#) 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 National Grid](#) 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 ([SoCG](#)).
 - The operator's Relevant Representation [[RR-0915](#)] submitted to the Planning Inspectorate on 8 October 2025 was published on 12 December 2025.
- 2026
 - [3 February email from National Grid requesting review of and comments on draft SoCG \(V.07\) responding to Operator Relevant Representation, in advance of Examining Authority \(ExA\) Deadline 1; response from Operator declining to sign SoCG and requesting National Grid engagement regarding CSE compound re-location](#)
 - [27 February email from National Grid advising of draft SoCG submission to the ExA and stating commitment to progression of engagement and resolution of outstanding matters; response from Operator welcoming further engagement but raising concerns limited to mitigation of construction impacts](#)

- The operator’s Written Representation [REP1-268] was published on 5 March 2026
- 31 March email from National Grid notifying of publication of **8.8.1 Applicant’s Comments on Written Representations [REP2-029]** responding to operator Written Representation [REP1-268] and proposing meeting to discuss key outstanding matters in advance of Deadline 4 as follows:
 - Consideration of mitigation measures to minimise, where possible, adverse aerodrome impacts during Project construction
 - Reasonable mitigation of residual aviation operational effects relevant to the Project’s operation
 - Review of planning future activities for the aerodrome to ensure they are given due consideration
- 1 April Operator acceptance of meeting proposal and re-iteration of concerns regarding National Grid consultation regarding CSE compound re-location.
- 7-8 April various correspondence between Operator and National Grid regarding meeting arrangements
- 13 April meeting invitation and proposed agenda from National Grid; email from Operator proposing addition of CSE compound siting decision to meeting agenda
- 16 April online meeting discussing progression of SoCG matters:
 - 7.3 Aerodrome consultation (including in relation to CSE compound siting decision)
 - 7.4 Aerodrome safeguarding
 - 7.5 Impact assessment methodology
 - 7.6 Impact assessment conclusions and operator risk acceptability
 - 7.7 Mitigation measures
- 16 April email from National Grid providing amended version of draft SoCG following meeting (Revision B.1)
- 21 April email from Operator providing ‘red line’ version of draft SoCG (Revision B.2)
- 25 April email from National Grid providing revised draft SOCG (Revision B.3) following feedback
- 29 April email from Operator requesting post Issue Specific Hearing meeting to discuss the overhead line design and CSE compound positioning adjacent to Raydon Wings aerodrome

6. ~~5.~~ Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
5.4 <u>6.1</u>	<u>Aerodrome Safeguarding</u>	<u>The Stakeholder and the Applicant agree the operator's responsibility for safeguarding and the role of safeguarding plans to provide a trigger for consultation rather than an absolute determination of where obstacles can be positioned relative to an aerodrome</u>	<u>16 April 2026</u>	<u>NPS EN-1 (2024)</u>

7. ~~6.~~ Matters Currently Under Discussion

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
6.4 <u>7.1</u>	Legislative, Regulatory, Policy and Guidance Context	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.	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. 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 Planning Policy Framework, last updated February 2025 NPS EN-1 Overarching National Policy Statement for Energy, November 2023

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>The Stakeholder states that judgements on aerodrome safety must be based, in the first instance, on Civil Aviation Authority (CAA) publication CAP 168 ‘Licensing of Aerodromes and its subordinate CAP 738 ‘Safeguarding of Aerodromes’, representing accepted standards for safe aerodrome operations, including in relation to obstacle safeguarding protocols.</p> <p>(June 2024)</p> <p>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.</p> <p>(May 2025)</p>	<p>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 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).</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.</p> <p>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</p>	<p>EN-5 Electricity Networks National Policy Statement, March 2023</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>

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>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>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>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</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>aforementioned policies and guidance to the Project and its determination (June 2025)</p> <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. (January 2026)</p>	
<p>6.27.2</p>	<p>Corridor and Preliminary Routeing and Siting</p>		<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</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</p>

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>undertaking is consistent with the engagement approach taken, as described within ES Appendix 15.2. This is in 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</p>	<p>Impact [APP-267]</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>Design Development Report describes how potential aviation impacts relating to Raydon Wings in particular were duly considered in 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.</p> <p>(January 2026)</p>	
<p>6.3<u>7.3</u></p>	<p>Aerodrome Consultation</p>	<p>The Stakeholder considers that National Grid did not contact Raydon Wings at a sufficiently early stage (prior to early 2023), <u>or at all until contacted by the aerodrome operator</u> 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</p>	<p>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</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>appeared to have largely predetermined the route, primarily upon cost grounds. (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. (February 2025)</p> <p>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</p>	<p>aerodrome operations. National Grid engaged Raydon Wings as the Project design was developed<u>including</u>developed<u>including</u> meeting the operator during the second non statutory consultation (July 2023) and the statutory consultation (April 2024). 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. (May 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. (January 2026)</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
		<p>practice protocols and Gunning Principles which should be expected of any national infrastructure project.</p> <p>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.</p> <p>(April 2025)</p>		
6.47.4	Aerodrome Safeguarding	<p>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.</p> <p>(June 2024)</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 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</p>	Raydon Wings Safeguarding Plan

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>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. (April 2025)</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</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>safeguarding evaluation at aerodromes 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>	
<p>6.57.5</p>	<p>Aviation Impact Assessment Methodology and Key Assumptions</p>	<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 but should not be any less safe than that found at a licensed aerodrome.</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</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>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 via consultation with operators and relevant aviation stakeholders, and may include proposed operations where commitment is demonstrated); 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</p>	

ID	Issue	Stakeholder position (including date)	National Grid response (including date)	Relevant documentation
			<p>operations and no further design changes are considered likely to be necessary. National 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.</p>	

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			<p>ES Appendix 15.2 explains the consideration of cumulative impacts as part of the applicant’s overall impact assessment approach. (January 2026)</p>	
<p>6.6<u>7.6</u></p>	<p>Proposed Project Alignment and Impact Assessment Conclusions</p>	<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 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.</p> <p>The Stakeholder raised the requirement for satisfactory expert assessment of the potential for disruption to aircraft systems that might result from underground</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</p>	<p>Aerodrome Assessment Summary Apr25; Technical Drawings (01_220101_96_ Raydon Wings Airstrip – RevA)</p>

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		<p>cables crossing the runway. (June 2024)</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. (February 2025)</p> <p>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.</p> <p>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</p>	<p>aircraft avionics or other aircraft systems, compromising operational safety. It is 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>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</p>	

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		<p>consequent cessation of operations. (May 2025)</p>	<p>operates at 50 hertz while aviation electrical supply, when not direct current (DC) typically operates at significantly higher frequencies, 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>	

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			<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>	
<p>6.7.7.7</p>	<p>Mitigation Measures</p>	<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.</p> <p>The Stakeholder considers that the aerodrome would be able to work around the temporary disruption caused by works to install underground cables (provided always that National Grid worked constructively with the aerodrome to</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> <p>In view of the assessment conclusions,</p>	

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		<p>minimise disruption), albeit with the expectation of compensation for the period of potential operations disruption. (June 2024)</p> <p>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 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. (May 2025)</p>	<p>further changes to the Project overhead line 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. 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. 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 aviation impacts, balanced with technical</p>	

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			<p>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 Project alignment, as well as to discuss</p>	

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

8. ~~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: _____

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Modified filename: 8.3.35 Draft Statement of Common Ground - Raydon Wings Airfield Revision B Clean Version.docx	
Changes:	
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Delete	56
Move From	0
<u>Move To</u>	0
<u>Table Insert</u>	2
Table Delete	0
<u>Table moves to</u>	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	153