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Norwich to Tilbury

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**Document: 8.3.37 Draft Statement of Common Ground - Tibenham
Aerodrome - Tracked Changes Version**

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Revision History

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| <u>A</u> | <u>26 February 2026</u> | <u>Deadline 1</u> |
| <u>B</u> | <u>12 May 2026</u> | <u>Deadline 4</u> |

Tibenham 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~~ disagreement between National Grid and Tibenham ~~airfield~~ aerodrome regarding ~~potential~~ the aviation impacts in relation to the proposed Norwich to Tilbury Project.

The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process.

2. Parties to the SoCG

This SoCG has been prepared by National Grid in seeking the agreement of the Norfolk Gliding Club ([\(NGC\)](#)), the operator of Tibenham aerodrome.

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 position is that the Project is contrary to EN-1 as aviation operations will be adversely impacted. The Stakeholder expects the Applicant to fulfil 'Agent of Change' responsibilities for mitigation in accordance with the NPPF. The Applicant's position is that its approach is consistent with the requirements of EN-1 and EN-5 as the primary determining policies for the application, as well as the NPPF and relevant aviation sector-specific guidance.</u> | <u>Considered unlikely to resolve bilaterally. For the Examining Authority to assess.</u> |
| <u>7.2</u> | <u>The Stakeholder position is that consultation has not been meaningful as concerns raised have not resulted in changes to the Project design, and Project information has been withheld. The Applicant position is that consultation undertaken was fully compliant with legislative requirements and</u> | <u>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>the Statement of Community Consultation. No information has been withheld. 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>7.3</u> | <u>The Stakeholder position is that the Applicant assessment approach is inappropriate as it is not derived from the aerodrome safeguarding zone. The Applicant position is that safeguarding is distinct from impact assessment. Its methodology focuses on obstacle clearance and Obstacle Limitation Surface (OLS) infringement amongst other factors and is in accordance with EN-1 requirements.</u> <u>The Stakeholder position is that gliding operations are not appropriately considered in the impact assessments. The Applicant position is that key assessment parameters and assumptions are appropriate and welcomes continued engagement regarding measures used to inform the Stakeholder position.</u> | <u>[Propose separation of matter of safeguarding from impact assessment. Suggest in agreement in relation to safeguarding. Not agreed by Stakeholder.]</u> <u>[Proposed for further discussion. Not agreed by Stakeholder]</u> |
| <u>7.4</u> | <u>The Stakeholder position is that the Project will adversely impact the safety of gliding operations, specifically for aerotow take-offs, forced landings and competition finishes. The Applicant impact assessment conclusions are that safe operations can continue, including in these circumstances. The Applicant welcomes continued engagement to inform its understanding of Operator risk acceptance thresholds.</u> <u>The Stakeholder and the Applicant agree powered aircraft can take off with a sufficient safety margin.</u> | <u>[Proposed for further discussion. Not agreed by Stakeholder]</u> <u>[Propose separation of impact assessments conclusions for powered aircraft and gliders. Suggest in agreement in relation to powered aircraft. Not agreed by Stakeholder.]</u> |
| <u>7.5</u> | <u>The Stakeholder position is that overhead line re-routing outside the safeguarding zone or undergrounding is required to mitigate adverse aviation impacts. The Applicant position is that substantial changes to the Project design are not justified by the assessed aviation impacts. Measures to mitigate residual impacts have been suggested to the operator for their consideration.</u> | <u>[Proposed for further discussion. Not agreed by Stakeholder]</u> |
| <u>7.6</u> | <u>The Stakeholder position is that the proposal will adversely impact the aerodrome's status as a national Significant Area for Sport (SASP) as well as its financial viability. The Applicant position is that assessed effects,</u> | <u>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>including business impacts, are not significant.</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 an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted for the Project.

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

The Planning Act 2008 places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two non-statutory and one statutory consultation to inform its proposals, together with further 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, 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. Reciprocally, EN-1 states that it is essential for aerodrome operators to work collaboratively with energy infrastructure developers essential for net zero, recognising the need for the important economic and social benefits of aerodromes to be balanced with the urgent need for new energy developments which bring about a wide range of social, economic and environmental benefits.

EN-1 places a requirement on DCO applicants to consult with any aerodrome likely to be affected by the proposed development in preparing an assessment of the proposal on aviation interests. With a number of aerodromes, Tibenham aerodrome was identified and included in the scope for assessment, with its runway ~~end~~ being located ~~only 1.7km from~~ within 5 km of the Project's proposed overhead line alignment, recognising the potential for the proximity of the infrastructure to impact aviation and aerodrome operations. In accordance with EN-1 requirements, the operator of Tibenham aerodrome (Norfolk Gliding Club) was identified as a priority stakeholder for engagement in relation to aviation impact considerations.

~~Norfolk Gliding Club~~

~~Use of runway 08 for aerotows will become unsafe — loss of income due to not being able to fly on those days when the wind is in that direction~~

~~EFATO options for runways 08 & 33 will be severely restricted~~

~~BGA have advised that the pylons represent an unsafe environment and will result in a loss of national competitions at a significant cost to the club~~

~~The proximity will also affect the asset value of the club, the sport and recreational value of the club~~

The chronology of National Grid's consultation approach, including engagement with Tibenham 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
- 13 June written representation from General Aviation Awareness Council (GAAC) on behalf of the Operator raising concerns regarding the proximity of the Project to the aerodrome
- ~~– There was no formal NG/NGC consultation in 2022. The NG team turned up at the Tibenham village hall and I understand talked in general terms to anyone from the village who wished to discuss the project.~~
- ~~– In fact, it is believed that NG ignored all airfields in this initial consultation phase and had they included them in their initial draft alignment would have been different and avoided a lot of the issues we now face~~
- 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
 - 24 July meeting at Tibenham aerodrome between National Grid, its appointed aviation consultants 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. Matters raised included:
 - Concerns regarding the proximity of the preferred alignment to the aerodrome, which passes through their 5km safeguarded area and is considered would endanger take-offs and approaches from the east/west R08/26 runway.
 - Concerns regarding the proximity of the preferred alignment -creating a serious risk to the pilots in the event of any reduction in power/climb rate during take-off and their need for an emergency landing
 - Concerns that 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 with a corresponding loss in income to the club
 - ~~○ Although present at the meeting NGC understand that the Priory Farm operators will be asked to complete their own SoCG~~
 - NG agreed to investigate the effect that the proposed route would have on electronic communication and conspicuity systems: Radio communication range, FLARM, ADSB, Transponders ~~— this has not been provided.~~
- 2024

- Development of the 2024 Preferred Draft Alignment, considering feedback and other studies, as described within the **7.21 2024 - Design Development Report for the Project [APP-359]**
- 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
- 1 May meeting between National Grid (with ASA) and the Operator. Matters raised included:
 - Concern that the preferred alignment was unsafe in terms of aviation impacts, and contrary to [relevant policies and regulations](#)
 - Discussion of the existing safeguarding area of 5km radius from the centre of the aerodrome for obstacles
 - Consideration of gliding-specific operational activities, including in relation to competitions, and associated requirements and confirmation that with the preferred draft alignment the BGA would not allow Tibenham to remain a viable National Competition site with a corresponding loss in income to the club
 - Discussion of potential alternatives, ranging from offshoring or undergrounding the transmission line, relocating outside the safeguarded (5km) area or 3.5km west of the nearest runway end, or altering the design to incorporate low height pylons together with NGC view that low height pylons do not solve the need for emergency landings in the event of power/climb rate reductions during take-off
- 20 July written representation received from the Operator objecting to the Project, summarised as follows:
 - Concerns the proposals are contrary to government, Civil Aviation Authority (CAA) and planning guidelines as well as the Air Navigation Order 2016
 - Concerns regarding National Grid’s appointed aviation consultancy’s understanding of gliding operations, reiterating the need for the Operator’s authority on safety to be recognised
 - Concerns regarding adverse impacts on the safety of operations and consequential impacts on aerodrome status as a Community Amateur Sports Club (CASC) and National Significant Area for Sport (SASP)
- 2025
 - Development of the proposed Project Alignment prior to DCO submission, considering feedback and other studies.
 - 12 February correspondence from the Operator regarding targeted consultations in the Norwich area and requesting a meeting to discuss Tibenham aviation impacts
 - [29 April email from National Grid’s appointed consultant proposing a meeting for 8 to 14 May to discuss the latest Project design and outstanding matters raised within feedback responses](#)

- ~~29 April~~ 2 May to ~~5 August~~ 7 May - correspondence between National ~~Grid's appointed consultant~~ Grid and the Operator in relation to meeting arrangements and ~~subsequently drafted SoCG~~ outstanding matters
- 29 May letter from National Grid to the Operator regarding proposed SoCG and provision of Aerodrome Assessment Summary (May 2025) and technical drawings, and proposing meeting for 6 June
- 30 May correspondence between Operator and National Grid regarding meeting arrangements and outstanding issues
- 1 June email from Operator requesting postponement of meeting pending written responses to questions raised
- 9 June email from National Grid responding in writing to questions raised
- 16 June email from Operator regarding matters of disagreement and questioning purpose of SoCG process
- 20 June email from National Grid responding to matters raised, sharing ~~of~~ revised versions of Aerodrome Assessment Summary (v.4 June 2025) and technical drawings, and proposing new meeting dates of 30 June, 15 July and 30 July
- 6 July email from Operator providing amended versions of SoCG and impact assessment, with response from National Grid responding to matters raised and proposing new meeting date of 7 August with draft agenda
- 14 July email from Operator raising issues with proposed agenda and requesting written mitigation proposals by 24 July
- 24 July email from National Grid responding to Operator, making amendments to agenda and proposing discussion of potential mitigations at 7 August meeting
- 28 July email from Operator and responses from National Grid regarding proposed agenda and meeting arrangements
- 4 August email from Operator, with 5 August response from National Grid regarding acceptance of proposed meeting agenda and meeting arrangements
- 7 August meeting in-person meeting between National Grid (with ASA) and representatives of Tibenham and Priory Farm aerodromes. Decision to adjourn meeting made by operators. Matters discussed (prior to adjournment) included:
 - Route development rationale and consideration of operator, CAA, BGA and GAAC advice therein
 - Aviation safety risk assessments, including consideration of Engine Failure After Take Off (EFATO), information sharing, and cumulative impacts
 - Transmission technologies cost comparisons, including with regards to operator-proposed aviation impact mitigation options
 - Engagement next steps, including sharing of assessment information and further development of SoCG

- 19 August email from the Operator seeking resumption of meeting discussions [following to follow](#) provision of information and documentation by National Grid, and confirmation of mitigation requirements
- 10 September email from National Grid providing draft minutes for 7 August meeting for review and updated draft SoCG to reflect matters discussed; [proposing meeting to progress SoCG](#)
- 11 to 22 September emails between the Operator and National Grid regarding [conditional](#) information requests and commenting on draft ~~documents~~ [minutes and SoCG, and arrangement for next meetings subject to DCO acceptance](#)
- 3 October email from National Grid notifying Operator of Planning Inspectorate acceptance of the Project DCO application, [and](#) publication of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]
- 4 to 26 October emails between the Operator and National Grid regarding information requests, technical questions and comments on airfield assessment summaries, and proposed meeting to progress SoCG
- 31 October email from National Grid responding to technical questions and airfield assessment summary comments and referencing the published 5.15 Design Development Report [APP-122]
- 8 - 25 November emails from the Operator commenting on National Grid responses and raising concerns regarding provision of information, and the progression of consultation and SoCG discussions
- 27 November email from National Grid reiterating position regarding provision of information, and mitigation of aviation impacts via Project design
- 3 December to 15 January 2026 emails between the Operator and National Grid regarding provision of information, mitigation proposals and progression of SoCG

The Operator's Relevant Representation [\[RR-2754\]](#) submitted to the Planning Inspectorate was published on 12 December 2025

• [2026](#)

- [23 January email from National Grid advising of progress in updating SoCGs to reflect Relevant Representations](#)
- [6 February email from National Grid requesting review of and comments on draft SoCG \(V.05\) responding to Operator Relevant Representation, in advance of Examining Authority \(ExA\) Deadline 1](#)
- [9 February response from the Operator raising concerns regarding proposed changes to the draft SoCG and perceived withholding of information](#)
- [27 February email from National Grid advising of submission of draft SoCG to Examining Authority](#)

- 2 March email from the Operator acknowledging receipt of submitted SoCG, reiterating concerns regarding perceived withholding of information, and advising of content of Written Representation
- The Operator's Written Representation [REP1-256] was published on 5 March 2026
- 27 March email from National Grid proposing meeting (with the BGA) to discuss key outstanding matters in relation to gliding operations including aerotow take-offs, forced landings, and competition finishes, as well as associated risk mitigation, in advance of Deadline 4;
- 2 April email from the Operator stating meeting conditional on provision of perceived withheld information. Reaffirming concerns relate to aerodrome as a whole, not limited to gliding activity.
- 7 April email from National Grid sharing draft SoCG (Revision B) with summary table and proposing meeting with BGA on 15-17 April
- 9 April email from the Operator requiring provision of perceived withheld information prior to agreement of meeting dates.
- 14 March email from National Grid reiterating proposal for meeting to focus on matters regarding impact assessment and appropriate mitigation measures, advising of BGA attendance at meeting, and issuing of 17 April meeting invitation to all parties
- 15 April emails between the Operator and National Grid confirming NGC attendance at meeting conditional on provision of perceived withheld information, and National Grid's reiteration of its position that it does not consider materials to have been withheld.
- 16 April email from Operator confirming provision of withheld information is a prerequisite to any meeting and progression of the SoCG
- 17 April meeting held between National Grid and BGA (NGC did not attend). Topics of discussion included gliding-related impact assessment factors and associated mitigation measures.

6. ~~5.~~ Matters Agreed

| ID | Issue | Agreement reached | Date agreed | Relevant documentation |
|---------------------------|-------|-------------------|-------------|------------------------|
| 5.1 <u>6.1</u> | | | | |

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

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|---------------------------|--|---|--|---|
| 6.1 <u>7.1</u> | 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</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. | <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>NPS EN-1 Overarching National Policy Statement for</p> |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|---|---|
| | | <p>statutory instrument. (July 2023, repeated July 2024)</p> <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. Even NG’s consultants agree that there will be an increased risk to aviation safety.</p> <p>In ‘considering the feedback’ 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</p> <p>The proposed development clearly conflicts with the provisions of EN1.</p> <p>2- At the statutory consultation stage NG representatives were totally unaware of any feedback from the previous consultation. There is no evidence of ‘collaboration’. 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</p> | <p>Furthermore, the proposal has been designed, where possible, to minimise 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 should 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</p> | <p>Energy, November 2023</p> <p>EN-5 Electricity Networks National Policy Statement, March 2023</p> <p>National Planning Policy Framework, last updated February 2025</p> <p>The Air Navigation Order 2016</p> <p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p> |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|---|------------------------|
| | | <p>been ‘collaboration’ and if, at an early stage, NG had engaged with 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.</p> <p>5 – NGC totally refutes the assertion that the scheme was designed to minimise adverse impacts on aviation safety. There is nothing in the NG project documents that mentions aviation, let alone aviation safety. In addition, the CAA states in CAP 738 regulation 2018/1139 that only the aerodrome operator (Norfolk Gliding Club) is the authority to determine safety with respect to proposed obstacles near the aerodrome</p> | <p>(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>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.</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.</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</p> | |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|--------|----------------------|---|---|--|
| | | <p>6 – If as NG claims it considered the safeguarding requirements and parameters within CAP 738, why did it choose to ignore them. There is no mention of any such appraisal or assessment in any NG documents.</p> <p>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 that this should be ignored?</p> <p>Where is the evidence on which NG relies in order to make this assertion?</p> <p>Furthermore NGC, as the expert on its site and operations, believes the Project would breach this order</p> <p>(June 2025 following receipt of this draft SoCG).</p> | <p>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.</p> <p>(August 2025)</p> <p>In response the Norfolk Gliding Club Relevant Representation and as previously stated, National Grid considers its approach to be consistent with the instructions and guidance for an applicant as described within the energy NPSs, and particularly Section 5 of EN-1 (relating to civil aviation), which have taken account of the NPPF and PPG, where appropriate. This is set out within Section 15.2 of 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP267] which also describes the aviation-specific regulation and guidance National Grid considers relevant to the assessment of aviation impacts in relation to the Project.</p> <p>(January 2026)</p> | |
| 6.27.2 | Consultation to Date | NGC considers it should have been formally and specially engaged during the 2022 non-statutory consultation, prior to | Route mapping and a list of potentially impacted aerodromes was shared with the CAA AAT as the agreed central repository for | 5.1 Consultation Report - Appendix E: Statement of |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|---|--|
| | | <p>NG's development of the 2023 Preferred Draft Alignment, to avoid issues in relation to aviation impacts currently being discussed.</p> <p>NGC considers that information sharing, including provision of route mapping and a list of other aerodromes potentially impacted by the Project has not been completed.</p> <p>NGC is concerned that feedback previously provided has not been taken into consideration, concerns raised have not resulted in changes to the Project design, and that the consultation process is therefore unsatisfactory.</p> <p>(August 2025)</p> | <p>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.</p> <p>(August 2025)</p> <p>National Grid is confident that the consultation undertaken was fully compliant with the published Statement of Community Consultation and legislative requirements under the Planning Act 2008.</p> <p>Any design changes must be and have been justified by impact assessment, which has also been informed by stakeholder engagement. The Design Development Reports detail how consultation feedback regarding potential impacts on Tibenham aerodrome has been taken into consideration during the evolution of the Project design.</p> <p>An Aerodrome Assessment Summary and technical drawings to inform consultation were shared in May 2025, with updated versions shared in June 2025. The key information within these documents was</p> | <p>Community Consultation (SoCC) and supporting evidence [APP-071]</p> <p>7.20 2023 - Design Development Report for the Project [APP-358]</p> <p>7.21 2024 - Design Development Report for the Project [APP-359]</p> <p>5.15 Design Development Report [APP-122]</p> |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|---------------------------------|---|---|--|--|
| | | | <p>published within 6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] in October 2025. National Grid does not consider any key information to be missing that prevents progression of engagement. (January 2026)</p> | |
| <p>6.3<u>7.3</u></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. (July 2024)</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</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 we (NGC) are aware there has been no realistic evaluation of take-off, landing or forced landing risks despite all the research data provided in</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 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,</p> | <p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p> |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|---|---|------------------------|
| | | <p>2024, just some text book values which bear little resemblance to what happens</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 and therefore to use a popular phrase, it is not worth the paper it is written on</p> <p>4 – Which neighbouring aerodromes? We are still waiting 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. 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. 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</p> | <p>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 been considered, as well as account taken of current BGA guidance, including in relation to competition requirements. BGA engagement</p> | |

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| | | <p>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? We do not consider any increased safety risk acceptable</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 (June 2025)</p> <p>NGC raised concerns that details of impact assessments have not been shared with the operator or published. (August 2025)</p> | <p>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) (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 assessments 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. (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</p> | |

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| | | | <p>Grid will share the document with operators. (September 2025)</p> <p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267] explains how relevant CAA guidance, as well as consultation with aviation bodies and operators, has informed the development of the assessment methodology. (January 2026)</p> | |
| <p>6.47.4 6.47.4</p> | <p>Impact Assessment Conclusions</p> | <p>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>(July 2024)</p> <p>9 – Again reverting to the CAP 168 OLS approach which the CAA experts say is not appropriate at Tibenham</p> <p>10 – Recent test flights have shown that an aerotow with a two seat glider sometimes has difficulty reaching 200ft</p> | <p>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 (9) 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 (10). 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. (11)</p> <p>(May 2025)</p> <p>In addition to the Operator concerns,</p> | <p>Aerodrome Assessment Summary V.4 June 2025; Technical Drawings 01_220101_91 and 01_220101_97 RevB</p> |

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| | | <p>by the time it crosses the proposed OHL route so current circuits cannot continue to be used</p> <p>11 – 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>(June 2025)</p> | <p>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 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, 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.</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</p> | |

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| | | | <p>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. (August 2025)</p> <p>National Grid recognises that, as a result of its presence as an obstacle, the Project would increase risk to aerodrome operations. Through the aerodrome-specific impact assessments, National Grid has detailed and quantified the extent of any impacts, and in the case of Tibenham, has concluded impacts are not significant as clearances are adequate.</p> <p>National Grid has sought Operator agreement of risk acceptability. As the Operator has not agreed the impact conclusions, National Grid has sought feedback on what risk thresholds would be acceptable. (January 2026)</p> | |
| 6.57.5 | Mitigation Measures | Had National Grid proposed: An offshore solution; | EN-5 makes clear that the Government considers overhead lines to be the strong | |

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| | | <p>An underground solution whilst the Project crossed the NGC 5km safeguarding area; An overground solution outside the safeguarding area; There would be no cause to object. (July 2024)</p> <p>12 – Expert opinion on the adverse impacts of the proposed route is held by NGC, BGA and CAA who disagree totally with your conclusions</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>Therefore for the avoidance of doubt, the CAA states in CAP 738 regulation 2018/1139 that only the aerodrome operator (Norfolk Gliding Club) is the authority to determine safety with respect to proposed obstacles near the aerodrome</p> <p>Norfolk Gliding Club believe the proposed pylon route to be a significant aviation safety risk in respect of aerotow take-offs</p> | <p>starting presumption for electricity network development. In considering the need for an alternative, National Grid must fulfil its statutory duties and obligations to balance this with the need to be economic, efficient and to keep costs down in the interests of bill-paying consumers.</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. (12)</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.</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.</p> <p>In relation to gliding competition finishes, it is</p> | |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|----|-------|--|--|------------------------|
| | | <p>from runway 26 under normal circumstances and a very significant risk in the event of any power reduction during the early stages of the flight</p> <p>13 – 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 (June 2024)</p> | <p>suggested that an acceptable finish could be designed by the Operator, taking account of the Project alignment and subject to clarification of BGA guidelines. (13)</p> <p>(May 2025)</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> <p>National Grid’s position remains that substantial changes to the Project’s design as mitigation measures are not justified by the assessed aviation impact.</p> <p>National Grid remains ready to explore alternative mitigations and has previously offered support to the Operator’s consideration of reasonable operational measures to address the presence of the Project as an obstacle, such as enhancing pilot awareness.. In particular, National Grid wishes to discuss the potential for the Operator to design gliding competition finishes that respond to the presence of the overhead line and remain in accordance with</p> | |

| ID | Issue | NGC position (including date) | National Grid response (including date) | Relevant documentation |
|---------------------------|------------------------------|--|--|---|
| | | | BGA guidelines. (January 2026) | |
| 6.6 <u>7.6</u> | Other Impacts of the Project | <p>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 (SASP), together with our overall financial viability (July 2024)</p> <p>14 – The BGA have already stated that there will be a financial impact yet this continues to be ignored (June 2025)</p> | <p>In view of the current assessment conclusions, no effects are anticipated for Norfolk Gliding Club in terms of its business or status. (14) (May 2025)</p> <p>6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within 3km Study Area [APP-266] outlines the nature of assessed effects of the Project (during construction and operation) for Tibenham aerodrome, including business impacts, concluding these are neutral and not significant. (January 2026)</p> | <p>6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within 3km Study Area [APP-266]</p> |

8. ~~7.~~ Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For Tibenham Aerodrome

Name: _____

Position: _____

Date: _____

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

Registered in England and Wales
No. 4031152
nationalgrid.com

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| <u>Add</u> | 86 |
| Delete | 55 |
| 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: | 143 |