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Norwich to Tilbury

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Gliding Association**

Final Issue A

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nationalgrid

British Gliding Association

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 the British Gliding Association regarding potential aviation impacts in relation to the proposed Norwich to Tilbury Project.

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

2. Parties to the SoCG

This SoCG is agreed between National Grid and the British Gliding Association.

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.

SoCG ID	Summary of matter under discussion	Deadline for resolution
7.1	The Stakeholder suggests value may be added to impact assessments and the consideration of appropriate mitigation measures through the provision of further information in relation to aerodrome movements or accident statistics. The Applicant position is that, whilst this information may enhance understanding of risk likelihood, we require and are yet to receive clarity on specific, quantified operational parameters that either the Stakeholder or the operator consider should be met or achieved for operations to be considered safe and acceptable.	Prior to Deadline 7; partial dependencies on Operator engagement to inform site-specific assessments and acceptability thresholds

SoCG ID	Summary of matter under discussion	Deadline for resolution
7.2	The Stakeholder is predominantly concerned regarding Project safety and utility impacts on Tibenham aerodrome presented by the risk of collision with pylons or cables on approach to the airfield and the associated risk of a land out. The Stakeholder position is that the hazard imposed by the Project will require the gliding club to significantly modify or reduce its operation. The Applicant position is gliding operations (and competitions) can continue safely.	Prior to Deadline 7; dependencies on Operator engagement to develop impact assessments and mitigation proposals

4. Background

4.1 Description of the Project/Development

National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales. The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project'). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

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

The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must

apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

National Grid has submitted an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted for the Project.

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

The Planning Act 2008 places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two non-statutory consultations and one statutory consultation to inform its proposals, together with further targeted consultations.

5. Stakeholder Interests

The Overarching National Policy Statement for Energy (NPS 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 states that collaboration and co-existence between aviation, defence and energy industry stakeholders should be strived for to ensure scenarios such that neither is unduly compromised.

The British Gliding Association is the governing body for the sport of gliding in the UK. It provides advice and assistance to gliding clubs on a range of topics including safety and is responsible for facilitating gliding competitions.

The chronology of the development of the Project's design and National Grid's engagement with the British Gliding Association to date is summarised as follows:

- 2022
 - National Grid presented information on how the Project was evolving from the evaluation of strategic options to a preliminary preferred graduated swathe within which new infrastructure (pylons and underground cables) could be located as well as a proposed new substation site on the Tendring Peninsula, as described within [7.18 2022 - Corridor and Preliminary Routeing and Siting Study \[APP-356\]](#)
 - 21 April – 16 June non-statutory consultation on the preferred graduated swathe
- 2023
 - Development of the 2023 Preferred Draft Alignment, responding to consultation feedback and other studies, as described within the [7.20 2023 - Design Development Report \[APP-358\]](#)
 - 27 June – 21 August non-statutory consultation on the 2023 Preferred Draft Alignment

- 2024
 - Development of the 2024 Preferred Draft Alignment, responding to consultation feedback and other studies as described within the [7.21 2024 - Design Development Report \[APP-359\]](#)
 - 10 April – 26 July Statutory Consultation on the 2024 Preferred Draft Alignment
 - 26 July BGA written representation to consultation raising concerns regarding Project impacts on Tibenham aerodrome following consultation with BGA member Norfolk Gliding Club (NGC). Specific concerns summarised as:
 - Launches from runway 26 and potential consequential operational capacity and financial effects
 - Potential impacts on pilot training
 - Potential impacts on gliding competitions and status as a Sport England- designated national Significant Area for Sport (SASP)
- 2025
 - Development of the proposed draft Project Alignment, responding to consultation feedback and other studies as described with the [5.15 Design Development Report \[APP-122\]](#)
 - 2 March BGA written representation to targeted consultations raising concerns regarding Project impacts on Tibenham aerodrome following consultation with BGA member NGC. Specific concerns summarised as per 2024 Statutory Consultation representation, recognising no changes to the proposed Project alignment to the west of the aerodrome have been implemented.
 - 27 May meeting between National Grid and the BGA to discuss the development of general guidance for the consideration of gliding impacts within electricity transmission projects, including:
 - Recognising the importance of early engagement with aerodrome operators to enable relevant information regarding club or site-specific operation activities and constraints to be shared to inform development proposals
 - Discussing the need for an objective or standardised means of assessing potential gliding impact in relation to obstacles
 - 28 May emails between National Grid and the BGA agreeing to update NGC on general guidance engagement, with the BGA reiterating concerns regarding the proximity of the proposed Project alignment and potential safety and economic impacts.
 - 5 December email from National Grid to the BGA sharing [6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact \[APP-267\]](#) and raising the potential provision of a BGA Position Statement

- 2026
 - 1 January email from BGA to National Grid providing copy of [Relevant Representation \[RR-0412\]](#) submitted to the Planning Inspectorate
 - 17 April meeting between the BGA and National Grid representatives regarding proposed Statement of Common Ground and progression of technical matters regarding gliding impact assessment and mitigation, relating to Tibenham aerodrome [Operator invited to meeting but declined to attend], including:
 - Aerotow take-offs
 - Forced landings
 - Approaches and competition finishes

6. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
6.1				

7. Matters Currently Under Discussion

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
7.1	Aviation Impact Assessment Methodology and Key Assumptions	<p>We note the BGA's detailed response to NG dated 25 July 2025. The following comments support the BGA's concerns about the negative impact on safety of the proposed pylons and cables associated with approaching the airfield from the west.</p> <p>Tibenham airfield is the home of the Norfolk GC, which has successfully operated on the site for some 50 years. The club provides sailplane pilot training for people of all ages, provides an operating site for trained sailplane pilots, and is a highly respected and popular gliding competition venue. All three activities collectively provide the income that this not for profit, predominantly volunteer run community sport club needs</p>	<p>The Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267] provides details of the applicant's aviation impact assessment methodology, primarily used to evaluate risks of collision, recognising the Project's proposed overhead line alignment will represent a new obstacle within the vicinity of aerodromes. The methodology description shows regard to multiple site-specific risk factors including the nature of the obstacle (being a line rather than a single isolated object) and whether there is an appropriate clearance margin to overfly or avoid the obstacle on take-off or landing, considering operational</p>	<p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p>

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		<p>to sustain itself. The site has also been designated as a national significant area for sport (SASP) by Sport England and the British Gliding Association.</p> <p>Safeguarding zones/assessments of potential obstacles relating to UK civil licensed aerodromes may extend out to distances greater than 15 kilometres from the runway thresholds. Various factors (including runway lengths/configurations and the types of operation) influence the dimensions of each aerodrome's safeguarding zones (ref CAA). Safeguarding do not apply to unlicensed aerodromes. However, the same approach to the reasonable management of risks, e.g. the need to consider the impact of vertical development close to an airfield, remains. The proposed 55m high vertical development 1.7km from the nearest runway at Tibenham airfield is a hazard to sailplane traffic approaching the airfield from the west.</p> <p>A sailplane is constantly descending through the air which flows across the sailplane wings and tailplane resulting in controlled, descending flight and a gliding angle of, typically, 1 in 40, which means one metre descended for every 40 metres</p>	<p>procedures and aircraft performance classes, including for glider aerotows (paragraphs 15.3.22-15.3.38 refer). The methodology also addresses forced landing risks including those arising as a result of partial or full engine failure, predominantly after take-off (paras. 15.3.39-15.3.42 refer). National Grid's position is that there can be multiple reasons for forced landing (including mechanical causes such as unlocked airbrakes or other aerotow issues), but the key risk assessment factor in terms of the effect of the Project is consideration of whether there is sufficient distance between the runway and the overhead line for the pilots of tug and glider aircraft to manoeuvre and land safely, before or beyond the overhead line in a forced landing event.</p> <p>Paragraph 15.3.28 of Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267] details assumption parameters within the National Grid aviation impact assessment methodology, including minimum</p>	

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		<p>flown horizontally. As a result, sailplanes can fly at a relatively shallow approach angle towards an airfield.</p> <p>The atmosphere is dynamic. Sailplanes circle in air that is rising faster than the sailplane is descending, resulting in a climb. Sailplane pilots try to avoid sinking air, as sinking air significantly steepens a gliding angle. Sinking air can typically and suddenly reduce a sailplane’s glide angle to 1 in 10 or steeper.</p> <p>Essentially, there are two ‘levels’ of sailplane pilot qualification for the pilot in command. There is ‘pilot in command under supervision’, which is where a trainee pilot is flying alone in a sailplane under the supervision and authorisation of an instructor. A routine example is solo soaring flight during pilot training. The second is ‘pilot in command’ as the holder of a Sailplane Pilot Licence (SPL). The former is unlikely to have any experience of landing in fields and will be reliant to some extent on their decision-making being supported in so far as it can be by the supervising instructor’s pre-flight briefing. The latter is fully trained, assessed, and licensed by the CAA. Note that CAP 793 Safe Operating Practises</p>	<p>clearance margins (both vertical and lateral) and maximum gradient angles considered in relation to take-offs and approaches by different aircraft classes. National Grid does not consider the Rules of the Air in relation to low flying to be relevant to assessed overhead line clearances (including for Tibenham, as defined within Table A15.2.11) where these relate to aircraft take-off and landing, exempt from low flying prohibitions (Rules of the Air Regulations 2007 Schedule 1 Section 3 Rule 6 refers). This is notwithstanding that the lateral minimum clearance specified of 150m (500ft) is consistent with the Rule 5 “500 feet rule”.</p> <p>National Grid has sought clarification from aerodrome operators and aviation bodies on what they would consider to be acceptable minimum clearance parameters to enable aviation impacts to be quantified and would welcome the BGA’s input on this matter. More specifically, and further to the National Grid and BGA meeting of 27 May 2025,</p>	

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		<p>for Unlicensed Airfields Chapter 1 Paragraph 4 states "where flying training is taking place additional safety margins (and risk assessment) should be considered"</p> <p>Problem solving, decision making, situation awareness and workload management are all well-known pilot human factors (ref CAA CAP737 Flight crew human factors handbook). A sailplane pilot who is flying towards an airfield for landing is busy and does not have the benefit of propulsion to maintain height and therefore glide angle. The pilot can utilise on-board equipment and knowledge of the airfield and surrounds to help visually judge on an ongoing basis whether it is safe to continue the approach given relevant factors including sinking air, etc. Visually judging the distance above an obstacle, particularly wires, is extremely challenging, particularly if the aircraft is constantly descending, as a sailplane always is. In the case of Tibenham airfield, if a sailplane pilot judges at some distance from the airfield that they cannot safely clear obstacles on a constantly descending approach to the airfield, they</p>	<p>National Grid would be grateful for any updates on the BGA's consideration of objective or standardised means of assessing potential gliding impacts in relation to obstacles, including preferred alternatives or adjustments to the approach described.</p> <p>(March 2026)</p> <p>We are grateful for the Stakeholder's description of the risk environment as well as their suggestion that the quantification of the number of movements potentially impacted (in the absence of statistical accident information) may be helpful. Whilst this information may inform assessment in terms of understanding risk likelihood, in order for the Project to be designed to minimise aviation impacts or for appropriate mitigations to be agreed, we require further information on what parameters should be met/achieved for operations to be considered safe and acceptable in the presence of the overhead line. From our perspective this includes the following:</p>	

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		<p>will decide to land in a field. If they misjudge the situation or the situation changes due to sinking air, that can result in a safe, albeit low arrival on the airfield. There are currently no significant obstacles to the west of Tibbenham airfield that require overflight by sailplanes to avoid them.</p> <p>Consider the sailplane approaching Tibenham from the west (the most likely direction given effects of sea breeze at Tibenham) with the proposed 55-metre-high pylons and associated cables acting as a 'wall' approximately 1700 metres from the end of the nearest runway. Most modern sailplanes can reach the nearest runway from the west from the height of the 'wall'. Some, with better performance, would in theory not need to be as high as the wall. The sailplane pilot approaching the wall at potentially less than 100m high now needs to estimate (there cannot be a guarantee in a sailplane) that the pilot will have enough height in hand to safely fly over the top of the 'wall' that cannot be flown around. If the pilot is unsure and gets it wrong, the outcome, i.e. collision with the pylons and cables, is most likely to result in a fatal accident. If the pilot</p>	<ul style="list-style-type: none"> • Acceptable overhead line clearances (during any phase of flight) • Lowest safe height for turns for aerotow after take-off • Typical glide angles for approach and other phases of flight • Finishing heights for competitions (generally, and specifically for Tibenham) • When gliders are considered to be on approach (and therefore exempt from Rule 5 of Rules of the Air) • Best practice/minimum heights of glider at aerodrome boundary on approach <p>We seek further engagement with the Stakeholder, and ideally the operator of Tibenham aerodrome, to progress these technical matters.</p> <p>(May 2026)</p>	

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
		<p>judges at the last moment the cables cannot be cleared, the pilot will have to make a late decision to land in a field. Late decision out landings in fields are a known significant cause of serious accidents.</p> <p>Put simply, a 55-metre-high 'wall' on the approach to an airfield used predominantly by sailplanes which cannot regain or increase height is an accident waiting to happen unless the gliding club either stops operating or significantly adjusts its operation. Both of those options will negatively impact the Norfolk Gliding Club's utility and sustainability (April 2026).</p>		
7.2	Proposed Project Alignment and Aviation Impact Assessment Conclusions		National Grid's impact assessment conclusions for Tibenham aerodrome are that, whilst the Project will represent a new obstacle in the vicinity of the aerodrome, safe aviation operations can continue. This includes the conclusion that overhead line overflight clearance margins for straight ahead take-offs (including for aerotows) and glider or powered aircraft approaches are assessed as adequate (para. 15.4.24 and	<p>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</p> <p>6.15.A1 Environmental Statement Appendix 15.1 - Built and Other Assets within the 3km Study Area [APP-266]</p>

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
			<p>Table A15.2.11 of Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267] refer). In the event of engine failure of a towing aircraft, it is assessed that there is sufficient distance between the runway and the overhead line for the pilots of tug and glider aircraft to manoeuvre and land safely, before or beyond the overhead line.</p> <p>Environmental Statement Appendix 15.1 – Built and Other Assets within the 3 km Study Area [APP-266] provides a summary of the National Grid conclusion that no restrictions on the number of aircraft movements or the types flown from Tibenham aerodrome will result from the Project, and therefore no significant effects are anticipated during the Project’s construction or operation. Changes to the Project design have not been implemented as are not considered to be appropriately justified by potential adverse impacts to the aerodrome. Further explanation of this consideration is provided within the</p>	<p>5.15 Design Development Report [APP-122]</p> <p>The Rules of the Air Regulations 2007</p> <p>Simplified Rules for Regional and Club Competitions (BGA, 2022)</p> <p>CAP 393: Regulations made under powers in the Civil Aviation Act 1982 and the Air Navigation Order 2016 (CAA, 2021)</p>

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
			<p>Design Development Report [APP-122] (paras. 2.6.9, 4.5.1 and 4.5.2 refer).</p> <p>National Grid acknowledges that Tibenham aerodrome hosts gliding competitions and is recognised as a national Significant Area for Sport (SASP) by Sport England (paragraph 15.4.22 of Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267] refers).</p> <p>National Grid has consulted with and considered the concerns of NGC and the BGA regarding potential aviation impacts, including on competition flying. National Grid is continuing to engage with the operator to seek agreement to the acceptability of the Project and/or develop appropriate mitigation measures, such as potential changes to the operational procedures of the aerodrome (including in relation to gliding competitions, in accordance with relevant BGA guidance). Measures to enhance pilot situational awareness have been suggested and may address residual or perceived risks.</p>	

ID	Issue	British Gliding Association position (including date)	National Grid position (including date)	Relevant documentation
			<p>National Grid has considered the BGA's Simplified Rules for Regional and Club Competitions (2022) which require glider pilots to cross the finish ring or line at or above a defined height, chosen by the host to ensure aircraft can land safely after finishing and adhere to the Rules of the Air in relation to their approach to the airfield and landing pattern as defined within the Civil Aviation Authority's CAP 393 Regulations made under powers in the Civil Aviation Act 1982 and the Air Navigation Order 2016 (2021). As recognised within para. 15.4.25 of the Environmental Statement (ES) Appendix 15.2 - Review of Aviation Impact [APP-267], the applicant would welcome clarity on the specific implications of the Project for Tibenham aerodrome competition finishes, including those hosted at a national level, and the potential for the presence of the Project to be accounted for within the finish design.</p> <p>(March 2026)</p>	

8. Signatures

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

For National Grid

Name: _____

Position: _____

Date: _____

For the British Gliding Association

Name: _____

Position: _____

Date: _____

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