

AENC-NG-CNS-REP-0255

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.3.39 Draft Statement of Common Ground - MOD DIO  
(aviation safeguarding) - Clean Version**

**Final Issue B**

**June 2026**

**Planning Inspectorate Reference: EN020027**

**nationalgrid**

# Revision History

Version	Date	Submitted at
A	12 May 2026	Deadline 4
B	10 June 2026	Deadline 5

# Ministry of Defence (MoD) Defence Infrastructure Organisation (DIO) 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 Ministry of Defence (MoD) Defence Infrastructure Organisation (DIO) 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 DIO.

## 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 has drafted multiple requirements for the mitigation of assessed impacts on its assets, including restrictions to the vertical Limits of Deviation (LoD) of the overhead line in the vicinity of Wattisham Station aerodrome, and requirements for new infrastructure to be below specified heights near to the aerodrome as well as at East2WAM interfaces; detailed requirements relating to the mitigation of construction impacts have also been shared for the Applicant's review. The Applicant has advised the requirements are technically feasible, with acceptance subject to consenting and environmental review.	Prior to Deadline 7.

SoCG ID	Summary of matter under discussion	Deadline for resolution
	<p>The Applicant has committed to enabling accurate navigational charting through the provision of detailed Project information to mitigate impacts on military low flying and is currently incorporating the Stakeholder's request for further information to be included in this commitment, as well as confirming the appropriate mechanisms for securing the additional requirements, if accepted. The Stakeholder has confirmed that, subject to the inclusion of the requested requirements, the MoD will be able to remove its current statutory objection to the Project.</p>	

## 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, including military, as well as technical sites can be affected by new energy development and the need, therefore, for NSIPs to be developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected.

EN-1 places a requirement on DCO applicants to consult with the MoD in preparing an assessment of the proposal on military aviation or other defence interests. In accordance with NPS EN-1 requirements, and following prior engagement with MoD representatives of Wattisham Station (details listed in Appendix A), in recognition of the DIO's representation of the MoD as a consultee in UK planning and energy consenting systems, the DIO was identified as a priority stakeholder for engagement in relation to aviation impact considerations.

The chronology of National Grid's engagement with the DIO 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 location 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 Route Corridor graduated swathe
- 2023
  - Development of the 2023 Preferred Draft Alignment, responding to 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 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
  - 16 May DIO letter responding to the consultation. Matters raised included:
    - Confirmation the Project proposals are within the statutory safeguarding zones surrounding Wattisham Station and the East 2 WAM Network;
    - Confirmation the Project proposals are within Low Flying Areas (LFAs), with recognition of potential mitigations
    - Advising of no safeguarding concerns identified regarding aerodrome height and airspace obstruction by Project structures
    - Advising of no safeguarding concerns identified regarding bird strike in the vicinity of the aerodrome
    - Advising of safeguarding concerns in principle regarding potential conflict between the proposed Project alignment and the East 2 WAM Network, with recognition of a future requirement for detailed design information sharing to inform DIO's safeguarding assessment
  - 2-13 August correspondence between National Grid and DIO, involving:
    - National Grid sharing of Project design information including explanation of Limits of Deviation (LoD) parameters
    - DIO provision of further information regarding asset safeguarding parameters and potential Project interfaces
    - National Grid querying of appropriate mitigations to potential East 2 WAM Network impacts
- 2025
  - Development of the proposed Project Alignment, responding to feedback and other studies
  - 4 April – 6 July correspondence between National Grid and DIO, involving:
    - Agreement to develop a SoCG and
    - National Grid's provision of detailed Project design information to enable MoD completion of a revised impact assessment regarding defence assets (28 April 2025)
    - National Grid's request for a meeting to discuss the SoCG and revised impact assessment
  - 3 October DIO notification by National Grid of Planning Inspectorate DCO application acceptance and provision of **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]** as relevant documentation

- 6-27 November correspondence, involving:
  - DIO request for information to enable completion of assessments
  - National Grid’s response, providing detailed Project information as requested
- 12 December DIO submitted Relevant Representation to the Planning Inspectorate published
- 18 December correspondence from the DIO confirming receipt of National Grid information provided on 27 November and advising of its review by relevant Subject Matter Experts (SMEs) and a subsequent response to the Planning Inspectorate and National Grid to provide an updated MoD position.
- 2026
  - 9-28 January correspondence between National Grid and the DIO regarding the Relevant Representation, information sharing and progression of the SoCG.
  - 19 February meeting between National Grid representatives and the DIO, addressing:
    - Inclusion of Wattisham Station-related matters within DIO SoCG
    - Confirmation of Project infringement of aerodrome Obstacle Limitation Surfaces (OLS) as well as aerodrome-based ‘relevant receptor’ technical assets
    - Confirmation of Project infringement of East2WAM technical safeguarding zone and status of ongoing DIO impact assessments
    - Recognition of potential for construction related impacts
  - 20 February National Grid correspondence signposting published submission documents **2.7 Elevation Drawings - Overhead Line Profiles [APP-044]**, **3.1 Draft Development Consent Order [APP-56]** and **2.3 Works Plans - Section B [APP-018]** to further explain LoD, and **7.2 Outline Code of Construction Practice [APP-300]** to recognise need for Low Flying Area charting commitment
  - 23 February DIO correspondence providing updates to positions within draft SoCG
  - 25 February National Grid issue of meeting minutes, signposting of **2.6.2 Design and Layout Plans - Overhead Lines [APP-042]** to illustrate LoD, and request for technical meeting before 6 March
  - 27 February – 4 March National Grid proposals for meetings and request for DIO safeguarding plans and to share written representation
  - 5 March DIO provision of safeguarding map for East2WAM Network, non-acceptance of meeting request, and request for further information regarding LoD, craneage information and well as GIS and CAD formats of Project alignment, with National Grid response providing requested information
  - 6 March DIO correspondence regarding end user licence agreement to enable DIO information sharing, with National Grid response also providing link to **8.5.3 Applicant's Written Summary of Oral Submission and Response to Action Points for Issue Specific Hearing 1 [REP1-139]** providing LoD explanation

- 16 March DIO provision of safeguarding plan for Wattisham Station, with National Grid response requesting impact assessment update and meeting to discuss Project safeguarding infringements as well as mitigation requirements; DIO request for additional GIS information
- 17 March National Grid provision of additional GIS information for remainder of Project alignment
- 23 March DIO provision of GIS information for East2WAM and Wattisham Station safeguarding plans
- 24 March National Grid provision of updated SoCG, request for updates on progression of assessment and clarity on mechanisms for securing mitigation commitments to enable joint response to Examining Authority Written Question SS 1.7
- 27 March National Grid request for DIO updates on SoCG positions
- 31 March National Grid request for DIO updates and proposal of meeting to discuss outstanding matters; DIO response advising assessment ongoing and meeting without conclusions would be premature and counterproductive.
- 7 April National Grid provision of updated draft SoCG and query regarding East2WAM interfaces with existing assets
- 24 April meeting (and proceeding correspondence) between National Grid representatives and DIO, addressing:
  - Conclusions of MoD impact assessments
  - Draft requirements for mitigation of Project impacts
- 28 April meeting to confirm respective representations to Examination Authority Issue-Specific Hearing 2
- 5 May National Grid provision of updated draft SoCG for DIO review
- 7 May DIO provision of draft SOCG updated with tracked change comments
- 12 May National Grid request for further DIO information on draft mitigation requirements to inform design review, and invitation to meeting to present review findings
- 19 May DIO response to National Grid queries raised regarding requirements
- 21 May meeting (and proceeding correspondence) between National Grid representatives and DIO, addressing:
  - Project design review findings
  - Commitment wording and securing mechanisms

## 6. Matters Agreed

ID	Issue	Agreement reached	Date agreed	Relevant documentation
6.1	Military aviation and/or defence interests potentially impacted by the Project	The Stakeholder and the Applicant agree the potential for the Project to impact military aviation and defence assets, namely the East2WAM Network, Wattisham Station, and Low Flying Areas 5 and 10, as a result of its presence within defined statutory safeguarding zones.	24 April 2026	<b>6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation Impact [APP-267]</b>
6.2	Safeguarding and Impact Assessment Approach – Wattisham Station	The Stakeholder and the Applicant agree the need for the MoD to undertake assessment of potential Project impacts on Wattisham Station, encompassing aviation operations and aerodrome-sited technical installations, and considering obstacle heights and positions (including Limits of Deviation - LoD) as well as birdstrike risk and temporal construction effects. The Applicant has provided sufficient Project information to support these assessments.	24 April 2026	NPS EN-1 Overarching National Policy Statement for Energy, November 2023 EN-5 Electricity Networks National Policy Statement
6.3	Safeguarding and Impact Assessment Approach – East2WAM	The Stakeholder and the Applicant agree the need for the MoD to undertake assessment of potential Project impacts on the East2WAM Network, considering obstacle heights and positions (including LoD) as well as potential electro-magnetic field (EMF) effects. The Applicant has provided sufficient Project information to support these assessments.	24 April 2026	<b>5.7 Policy Compliance Document [APP-086]</b> <b>3.1 Draft Development Consent Order [APP-056]</b> <b>2.3 Works Plans - Section B [APP-018]</b>

ID	Issue	Agreement reached	Date agreed	Relevant documentation
				<p><b>2.6.2 Design and Layout Plans - Overhead Lines [APP-042]</b></p> <p><b>2.7 Elevation Drawings – Overhead Line Profiles – Part 1 of 2 [APP-044]</b></p>
6.4	Proposed Project Alignment and Assessment Conclusions – Wattisham Station	The MoD impact assessment has been completed and concluded that the proposed Project alignment can impact upon the safeguarded line of slope of the aerodrome’s Precision Approach Radar (PAR) navigational aid, as well as Obstacle Limitation Surfaces (OLS) to the east of Wattisham Station.	24 April 2026	
6.5	Proposed Project Alignment and Assessment Conclusions – East2WAM	The MoD impact assessment has been completed and identified that the proposed Project alignment interfaces with Network microwave links in four locations. In two locations, the assessment conclusion is that links will not be impacted. In one location (between pylons RG135 and RG136), the conclusion is that the link could be impacted. In the final location (in the vicinity of pylon RG155), the conclusion is that the link would be impacted	24 April 2026	

## 7. Matters Currently Under Discussion

ID	Issue	DIO position (including date)	National Grid position (including date)	Relevant documentation
7.1	Mitigation Measures	<p>Low Flying</p> <p>To address the impact [of the Project as an obstacle within LFA5 and LFA10] the MoD will require that a condition is added to any consent issued requiring that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.</p> <p>(May 2024)</p> <p>The MOD acknowledge National Grid's commitment and engagement with the MOD over the concerns and emerging issues with the proposed development. Following the 19 February 2026 meeting the MOD are carrying out further investigations into the lighting and/or charting requirements to address the potential for the development to introduce a physical obstruction to air traffic movements, along with continuing/completing the assessments into the technical impacts. The MOD welcome the opportunity for continued engagement with National Grid and their</p>	<p>National Grid intends to support the DIO's consideration and implementation of reasonable mitigations to address potential impacts from the Project to low flying, as well as for technical assets following detailed assessment.</p> <p>(April 2025)</p> <p>With regards to mitigation of Project impacts on military low flying, National Grid has signposted its commitment to ensuring Project structures can be accurately charted as per item S06 within Table 6.1 of <b>7.2 Outline Code of Construction Practice [APP-300 superceded by REP3-025]</b>. It is anticipated that ongoing engagement will confirm processes for implementation and monitoring.</p> <p>In relation to WFS aerodrome and technical assets sited therein, National Grid is ready to seek agreement of appropriate mitigation measures once Project impact assessments are confirmed, including (but not necessarily</p>	<p><b>7.2 Outline Code of Construction Practice [APP-300]</b></p>

ID	Issue	DIO position (including date)	National Grid position (including date)	Relevant documentation
		<p>representatives to look for solutions to concerns raised as a result of these assessments. (February 2026)</p> <p>Following the completion of the MOD assessments wording was shared with the Applicant to address the Aviation Charting and Aviation Safety Management requirements on 24 April 2026, along with the requirements for Wattisham Station Aerodrome Cranage/Temporal Structures Deployment Management, East 2 Wide Area Multilateration (WAM) Network Technicals Sites Safeguarding, and proposals for either requirements for Wattisham Station Precision Approach Radar Safeguarding &amp; Wattisham Station Aerodrome Obstacle Limitation Surfaces Safeguarding or proposal for the above to be implemented as an amendment of the text in Part 2, Article 5 of the draft DCO to define exclusions to the vertical limits of variation in relation to 3 sections of the development corridor. These requirements/proposals are currently</p>	<p>limited to) potential obstacle warning lighting, restrictions to LoDs within the vicinity of aerodrome operational activity, and measures to reduce impacts during Project construction.</p> <p>National Grid is concerned to ensure the timely resolution of matters regarding the East2WAM asset, recognising the potential for DIO to seek changes to the Project overhead line design, and the need to determine whether this can be achieved within the DCO alignment LoD or Order Limits. (March 2026)</p> <p>Following the MoD's conclusion of its impact assessments, the DIO has drafted requirements to mitigate Project impacts on the assets affected. The Applicant is currently reviewing these requirements (which include restrictions to the height of Project infrastructure in the vicinity of East2WAM interfaces, and removal of vertical LoD from defined route sections to mitigate impacts on the aerodrome PAR and OLS) to establish whether they are technically feasible and achievable within</p>	

ID	Issue	DIO position (including date)	National Grid position (including date)	Relevant documentation
		<p>being reviewed by the Applicant and DIO await a response. (May 2026)</p>	<p>the Project Order Limits. We also recognise the DIO requirements for the establishment of a crane/temporal structure deployment protocol to ensure operator advance notification of works within the aerodrome safeguarding zone and are considering the appropriate mechanisms for securing the commitments as necessary, in addition to using established Civil Aviation Authority protocols outside the zone. The Applicant notes the DIO request for further details to be included with the Project commitment to ensure permanent structures can be accurately charted to mitigate impacts on military low flying and is seeking to develop the commitment accordingly. (May 2026)</p> <p>The Applicant has undertaken design reviews and has advised that the DIO requirements to mitigate impacts on MoD assets are technically feasible and are now being reviewed internally to consider associated environmental effects, ensure design assurance, and establish any</p>	

ID	Issue	DIO position (including date)	National Grid position (including date)	Relevant documentation
			consenting implications. Furthermore, the Applicant is preparing draft wording in conjunction with the DIO for inclusion within the appropriate mechanisms in readiness for the anticipated confirmation and securing of our commitments to the requirements. (June 2026)	

## 8. Signatures

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

For National Grid

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

For DIO

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

## **Appendix A**

# **List of Engagements with Representatives of Wattisham Station (WS)**

- 2023
  - 17 April in-person meeting at Station between representatives of WS, National Grid and Alan Stratford Associates (ASA), National Grid’s appointed aviation consultants. Key discussion points included:
    - Likelihood of minimal impacts of Project on military helicopter and other light aircraft aerodrome users in terms of obstacle clearances
    - Potential operational impacts relating to radar interference
  - July to December - various email correspondence relating to sharing of Project design information for review by WS
- 2024
  - 2 February – National Grid shared route alignment and pylon heights (GIS format) in advance of Statutory Consultation, providing explanation for LoD also
  - 22 February – National Grid shared pdf version of route alignment and tower schedule
  - 15 March – WFS raised potential technical safeguarding impact associated with STAR NG (surveillance radar)
  - 10 April – report received on RAF Benson investigation into Project highlighting:
    - Infringement by proposed overhead line alignment into safeguarding zone for STAR NG
    - Request for Air Defence and Electronic Warfare Systems (ADEWS) engineering appraisal on acceptability of infringement
- 2025
  - 27 May online meeting between National Grid and consultancy representatives, and the aerodrome operator and the aerodrome manager of WS. Matters discussed included:
    - WFS awaiting update on ADEWS appraisal of potential impacts on STAR NG radar; recognising potential mitigations unlikely to require Project design changes;
    - Confirmation no outstanding safeguarding concerns regarding aerodrome;
    - Confirmation positions on all matters (excepting STAR NG impacts and mitigations) were agreed
  - 6-7 July emails between National Grid and WS seeking an update on ADEWS and DIO appraisals and the signing of the draft SoCG for submission with the DCO application

- 3 October email from National Grid to WS advising of the Planning Inspectorate's acceptance of the DCO application, the publication of relevant document **6.15.A2 Environmental Statement Appendix 15.2 - Review of Aviation [APP-267]**, the non-submission of the signed SoCG due to outstanding confirmation of the DIO position, efforts to engage the DIO regarding aerodrome safeguarding, and seeking an update on the ADEWS assessment
- 9 December 2025 emails between National Grid and WS seeking support in contacting DIO to confirm the aerodrome safeguarding position
- 2026
  - 30 January email from National Grid (also to DIO) seeking confirmation outstanding matters concerning STAR NG asset including conclusions of the ADEWS appraisal will be included within DIO safeguarding response, and clarification of any non-safeguarding matters to be addressed via separate WFS SoCG
  - 2 February email from WS requesting latest route alignment, with National Grid response directing to **2.3 Works Plans - Section B [APP-018]** and seeking confirmation of data format requirements
  - 3 February email from National Grid providing pdf map showing Project infrastructure within 5NM of the aerodrome, and table of heights for pylons within this vicinity
  - 6 February email from WS raising potential lighting requirement within Military Aerodrome Traffic Zone (MATZ)
  - 10 February email from National Grid (also to DIO) seeking confirmation of nature of lighting requirement, with response from WFS referencing the Civil Aviation Authority's CAP168 Licensing of Aerodromes standard.
  - 17 February **8.3.38 Letter – Wattisham Flying Station [REP1-106]** from National Grid (also to DIO) confirming approach to matters concerning Project interactions with WFS and suggesting separate SoCG no longer required

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